# Herefordshire Council

# Herefordshire Accessibility Strategy & Plan 2023









### **Accessibility Strategy & Plan**

This strategy and plan has been written in conjunction with Herefordshire Council's SEND Strategy which is available on the council website.

The priority for the Herefordshire Children and Young People's Partnership is to keep children and young people safe, and to give them the best start in life. We want them to have the best health and education, and to have opportunities to enable them to reach their full potential.

This accessibility strategy sets out the approach that Herefordshire Council is taking to increase access to education for disabled children and young people, so that they can benefit from educational provision to the same extent which children without disabilities can. (DfE advice, 4.2)

An accessibility strategy is required under the planning duty in the Equality Act 2010, Part 6, Section 88 (Schedule 10):

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

This strategy applies only to schools: the Equality Act requires ALL providers to make *reasonable adjustments* to avoid disadvantaging pupils with disabilities, but schools have an additional duty to plan for better access for disabled pupils, as detailed below. The reasonable adjustments duty and a wider and more strategic planning approach for schools are intended to complement each other. (DfE advice, 4.22, 4.27)

These planning duties therefore do NOT apply to Further Education, Higher Education or Early Years settings (unless constituted as a school). For them, the requirement to remove physical barriers is contained within the **reasonable adjustments** duty.

The council has provided guidance to schools on their duties under the Equality Act, including clarification of how the reasonable adjustments duty is shared between schools and the council here:

https://www.herefordshire.gov.uk/info/200144/schools\_and\_education/359/accessibility\_in\_schools

Every local area is required to have a joint strategic needs assessment (JSNA), which provides an understanding of the health and well-being needs of the local population. As part of our JSNA (known as Understanding Herefordshire), we updated our children's integrated needs assessment during 2018. It included an analysis of children with special educational needs and disabilities. The most recent JSNA information was published in 2021, and is available on the Understanding Herefordshire site: https://understanding.herefordshire.gov.uk/growing-up/childrens-integrated-needs-assessment/

#### The Equality Act 2010 requires an accessibility strategy for:

- 1. Increasing the extent to which disabled pupils can participate in the school curriculum
- 2. Improving the physical environment of schools 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 schools
- 3. Improving the delivery to disabled pupils of information that is readily accessible to pupils who are not disabled.

## 1: Increasing the extent to which disabled pupils can participate in the curriculum

All schools must "use their best endeavours" to provide "high quality teaching that is differentiated and personalised" and which should "meet the individual needs of the majority of children and young people." (SEN Code of Practice 1.24).

The council and its partners provide a range of services to support schools in making inclusive and accessible provision. Details are available in the Local Offer at:

https://www.herefordshire.gov.uk/localoffer

Services offered to schools by the council include:

- Support for:
  - Hearing Impairment
  - Visual Impairment
  - Physical Disabilities
  - Social, Emotional and Mental Health needs (Behaviour Support Team)
  - Autism Spectrum Condition (coordinated by Hampton Dene Primary School - see below)
- Hub, Home and Hospital Teaching Team (H3)
- Educational Psychology (including non-statutory work available for purchase by schools)

Specialist provision is also available through:

1. Resourced provision in mainstream schools for:

Autism Spectrum Condition and Speech, Language and Communication Needs

Hampton Dene Primary School

More details available at:

http://www.hamptondeneschool.co.uk/information/

**Autism Spectrum Condition** 

The Bishop of Hereford's Bluecoat School

More details available at:

https://www.bhbs.hereford.sch.uk/

2. Three special schools for Severe and Complex Learning Difficulties (SLD/PMLD)

Blackmarston School

Age 2 -11 years

More details available at:

https://www.blackmarstonschool.co.uk/

Barrs Court Special School and College Age 11-19 years

More details available at:

https://www.barrscourtschool.co.uk/

Westfield School

Age 2-19 years

More details available:

https://www.westfield.hereford.sch.uk/

1. One Post-16 specialist college for SpLD/PMLD including with Autism:

The Beacon College

More details available at:

https://www.barrscourtschool.co.uk/the-beacon-college/

2. One special school for Social, Emotional and Mental Health (SEMH) needs:

The Brookfield School

Age 7- 16 years

More details available at:

http://www.brookfield.hereford.sch.uk/

3. One Pupil Referral Unit:

Herefordshire Pupil Referral Services

Age 11-16 years

More details available at:

http://www.hprs.hereford.sch.uk/

Support for pupils with Severe Learning Difficulties (SLD) that attend
mainstream schools is available through contact with county SLD special
schools

In certain exceptional circumstances, Herefordshire Council may commission specialist independent and non-maintained provision where needs cannot be met or places are not available within local state-funded provision. Herefordshire Council continues to review the sufficiency of specialist provision in response to local demand.

#### Equipment

Some disabled children will require individualised equipment to enable access to the curriculum: smaller items such as pencil grips and writing slopes, and more specialist equipment such as height adjustable furniture, toilet seats and supportive seating. Such equipment will be provided as part of the reasonable adjustments duty (auxiliary aids). Currently the council expects schools to fund individual items up to £750 – (please see link below).

https://www.herefordshire.gov.uk/schools-education/accessibility-schools

For disabled children in Early Years settings, the council would expect providers to fund individual items up to £300. However, since April 2017, additional funding has become available through the Disability Access Fund (DAF). DAF was introduced for 3-4 years olds only, and assuming the child meets the criteria, Early Years providers can receive further funding of £800. For eligibility and more information please use the link below:

https://www.gov.uk/government/publications/early-years-funding-2022-to-2023/early-years-entitlements-local-authority-funding-of-providers-operational-guide-2022-to-2023

For more information on DAF please follow the link below:

https://www.herefordshire.gov.uk/support-schools-settings/teaching-children-sen-disability/5

For Post 16 settings, the council would expect providers to follow the guidance published by the Equalities and Human Rights Commission with regard to the Equality Act 2010:

https://www.equalityhumanrights.com/sites/default/files/equalityact2010-technicalguidance-feandhe-2015.pdf

In some circumstances, NHS services also support access to the curriculum for individual pupils, including Speech and Language Therapy, Occupational Therapy (e.g. specialist seating assessment) and Physiotherapy.

https://www.talkcommunitydirectory.org/local-offer-special-educational-needs-and-disabilities-send/health/healthcare-services-for-children/

For the Child and Adolescent Mental Health Service (CAMHS), further details are available on their website: https://camhs.hacw.nhs.uk/parents-and-carers

Services are also available which are not directly council managed – schools are able to use their SEN budget to purchase as required. Advice on sources of learning support is available here:

https://www.herefordshire.gov.uk/local-offer-professionals-sencos

# 2: Improving the physical environment of schools to enable disabled pupils to take better advantage of education, benefits, facilities and services provided

The council has a planning duty to improve the physical accessibility of school buildings over time. The council strategy has been i) improvement of physical access for known pupils in the system, ii) investment to create a geographical spread of accessible schools.

A system of physical accessibility ratings has been devised, based on our expected standards of accessibility which are published here:

https://www.herefordshire.gov.uk/info/200144/schools and education/359/accessibil ity in schools/2

The accessibility of our schools was audited in 2015 using these criteria, and 78% of county schools were found to be fully or mainly accessible. The descriptors for accessibility are intended as a guide for parents and carers. Parents and carers are advised to contact individual schools to find out more information and check the suitability of the facilities. Detailed information is published in our web-based directory of schools:

#### https://www.herefordshire.gov.uk/directory/18/a to z

A capital investment strategy for the school estates was published in 2016 (a new strategy will be published in 2023). One of the aims of this will be to improve the standard of physical accessibility alongside planned capital investment.

Where there is a new build, extension or refurbishment, it is expected that the school will incorporate any access facilities needed for existing pupils, as well as, in accordance with its statutory responsibilities, anticipate the needs of future pupils (e.g. level access, height adjustable work stations). The Specialist Teacher for Physical Disabilities and the Capital Investment Team will be happy to assist with this planning.

Councils do not receive any dedicated funding from central government for adaptation, improvement or alteration at any schools. Bids have to be made on each individual case as it arises. Where adaptations are required, a request is made for capital funding, to the full council each year, as and when individual learners' needs cannot be met by the existing school accommodation. Ideally, for any school that needs adaptation/alteration there is a requirement for schools to notify the council of access needs up to 2 years in advance. Parents/carers need to have discussions with schools/professionals regarding their desired school placement as far in advance as possible. This would be at pre-school/Early Years setting and in Year 5 at Primary school. Parents/Carer application to school admissions must state clearly that their child has physical access requirements and state those needs.

#### **PROCESS**

- 1. The Specialist Teacher for Physical Disability (STPD) will:
  - Gather information about any pupils starting or changing school, who will require adaptations.
  - Ascertain the views of the child and the family, and clarify future options.
  - Ask the Admissions Team (when appropriate) for their best guess destination to aid early planning (2 years if optimum).
  - Gather information on the child's individual needs, including from other professionals involved.
  - Provide written recommendations to the Capital Investment Team.
- 2. There will be a presumption against agreeing a school place until discussions (or formal consultation if an EHC Plan is in place) have taken place with that establishment about its capacity to accommodate the needs of the relevant pupil.
- 3. Where complex adaptations are required, planning must begin at 24 months ahead of transition. Schools need to give adequate notice, obtain landlord consent, and obtain agreement for any central funding, before incurring any costs.
- 4. Consideration should be given to whether adaptations at the school provide the best value for money as well as meeting the pupils' needs. There may be another school that is already accessible and can better suit the needs of the child. A cost analysis of potential transportation of the child for the duration of their term in school should be made in comparison to the cost of undertaking the required adaptations at the school.
- 5. The 'de minimis' for capital expenditure is set at £2,000. Any adaptations below this level will need to be funded from a school's own revenue budget. Examples of school funded schemes include but are not restricted to:
  - level access to the main entrance and public/pupil areas of the site
  - allocated accessible parking (and ongoing enforcement)
  - Ongoing improvements to signage and the sensory environment (appropriate contrasting colour schemes, floor coverings, curtains, blinds, lighting etc), highlighting of steps and changes of level
  - ICT and other equipment such as height adjustable furniture
- 6. For more complex and costly works there will need to be a minuted meeting on site with all parties present e.g. STPD, OT, Physio, School representatives, Capital Investment team, relevant Project Manager.
- 7. Once the LA has funded an adaptation, its upkeep and maintenance is then the school's responsibility. If a pupil moves and the school no longer needs a particular facility (e.g. a hygiene or physiotherapy room) the Governing Body must consult the

council about any change; if subsequently the facility is needed again, this reinstatement will then be the financial responsibility of the Governing Body.

#### **Adaptations in Voluntary Aided Schools:**

The Locally Co-ordinated Voluntary Aided Programme (LCVAP) system that historically provided capital funding to schools was ceased at the end of the financial year 2020-2021. Voluntary Aided schools must now use the same capital funding system used by other types of schools – the School Condition Allocations (SCA) and Condition Improvement Fund (CIF). Like LCVAP, both SCA and CIF grants will continue to be capped by statute at 90% of incurred expenditure, and Voluntary-Aided schools will need to be able to demonstrate they have made or sourced a 10% contribution to the costs of any resulting works.

#### **Adaptations in Academies:**

Academy Schools are independent of the council and are funded directly by Central Government.

Advice from the Education and Skills Funding Agency (ESFA) is that councils should discuss the placement of a pupil with additional needs with an Academy prior to the issue of an EHC Plan and that the issue of costs and funding should form part of that discussion. The Academy may decline a placement where it cannot afford to make the necessary adaptations.

It follows that the council must either:

- (i) Co-fund the cost of adaptations
- (ii) Fund the works required or offer the pupil an alternative non-Academy place.

## 3: Improving the availability of accessible information to disabled pupils

This covers planning to make information (normally provided by the school to its pupils) accessible to disabled pupils. This should take account of pupils' disabilities, pupils' and parents' preferred formats and be made available within a reasonable time frame

Herefordshire council has a long-established support service for pupils with physical and sensory impairments (PASS). The specialist teaching teams for visually impaired (VI) and hearing impaired (HI) pupils offer specialist advice, training and support to schools on making information more accessible by using methods such as Braille, large print, tactile diagrams and signing.

The council will ensure that a trained specialist teaching assistant will be provided for pupils with significant sensory impairment who need Braille or British Sign Language. Schools will be expected to contribute the first £6000 towards this cost from their notional SEN budget.

Children and young people with a visual impairment can also be trained in the use of specialist ICT and other equipment, such as low vision aids, so that they can access printed material independently. We encourage and support the use and modification of electronic texts.

- Support for SEN and disability: https://www.herefordshire.gov.uk/support-schools-settings/teaching-children-sen-disability?documentId=467&categoryId=200227
- Physical And Sensory Support Service: https://www.herefordshire.gov.uk/support-schools-settings/teaching-children-sen-disability/12
- Support for children with Autism Spectrum Condition and Speech, Language and Communication Needs: http://www.hamptondeneschool.co.uk/information/
- Assistive ICT for SEN in schools: https://www.herefordshire.gov.uk/support-schools-settings/teaching-children-sen-disability/13

#### References:

The Equality Act 2010 and schools (DfE advice: May 2014):

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

#### **SEN Code of Practice:**

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

## Accessibility Strategy & Plan 2022-2025

Lead		Timescale	Success Criteria	Resource / Support
Developmen	t of the Strategy	<u> </u>	<u> </u>	1
Head of Additional Needs	To consult on the Accessibility Strategy and Action Plan	<ul> <li>Jan 2023 out for consultation to schools and Parent Carers</li> <li>April 2023 consultation completed</li> <li>June 2023 - Council Governance process through to Cabinet</li> <li>July/August 2023 - Completed Accessibility Strategy Plan and on Local offer website</li> </ul>	Completed Accessibility Strategy Plan and on Local Offer website	Manager of PASS Team Sufficiency, Planning & Capital Investment Manager
Manager of PASS Team	To provide schools with information, advice and template to support schools to develop their own Access Plans	Included in consultation     Jan 2023 as an appendix     to strategy	Schools/settings have a suitable template to review their access plans	Head of Additional Needs and EY SEND Manager

Sufficiency, Planning and Capital Investment Manager	To establish common areas of concern from analysis of the access plans and through discussions with schools	<ul> <li>Audit March 2023 of plans completed</li> <li>Summary of audit produced April 2023</li> </ul>	Summary of audit produced	SEND Engagement & Market Development Officer
SEND Engagement & Market Development Officer	To disseminate     Accessibility Plan     template for schools and     other educational     establishments	Share templates via     Spotlight, face to face     meetings and virtual     meetings (Governors,     SENCOs, Headteachers,     Leaders and Managers)		SEND Engagement & Market Development Officer
Improvemen	t to the Physical Environment	of Schools		
Sufficiency, Planning and Capital Investment Manager	<ul> <li>Overview of schools' accessibility updated</li> </ul>	<ul> <li>Inventory of schools with ratings updated</li> </ul>	Inventory of schools with ratings accurate for admission in Sept 2023	Manager of PASS Team
Sufficiency, Planning and Capital Investment Manager	<ul> <li>Schools Directory search function updated so that parents/carers can search by accessibility rating.</li> </ul>	Information submitted to Web Team by September 2022	On Local Offer website and available Sept 2022	SEND Engagement and Market Development Officer
Manager of PASS Team	To ask for feedback from students/pupils using current provision/facilities	VI team/pupils survey 2022- 23	Summary of feedback published	PASS Team Support

Head of	To distance that governing							
Additional Needs	statutory duties v governor meetin	ria input at session	delivered by July	Body knowledge	Team			
EY SEND Manager	Improve the ability settings staff to mange of special eneeds and disability and disability are the settings.  Improve the ability settings are the settings staff to many are the settings	eet a wider ducational ities respons accessi  Update Gradua docume  Targetti all staff Gradua	dshire EY Graduated se document is ble October 2022 and review EY ted Response ent – July 2023 ng settings to ensure understand ted Response and y Accessibility ments	Published & circulated on Local Offer page  Additional EY staff trained	Comms Team			
		SENCos (f - Feb 2021	ourse to train up EY irst cohort Sept 2020 ) 2 x cohorts training Feb 22. 3rd cohort to Feb 2023	EY Settings are more confident in meeting a full range of needs	EY Manager			
		Inclusio	I Lottery funded EY n Project 'Dingley's e' April 2022	Event held	SEN Team HC Procurement Team			

Head of Additional Needs		•	Evaluate impact of Dingley's Promise project  SENCO / Inclusion conference to be delivered in November 2022  AET Autism L2 Training to be delivered to schools and across the county. From Sept 2020 to July 2024	By Sept 2023 80% of Herefordshire's EY settings and schools have a representative trained and all FE settings trained. Progress Mar 2022 – 38 schools	All Herefordshire Schools Post-16 learning and Skills Advisor EY SEND Manager
Manager		•	School / Child Readiness		
iviariagei			project – Dec 22		
Service		•	Inclusion Conference for		
Director,			CYP with SEMH -		
Education,			relationships / EBSA		
Skills and					
Learning					
Improving the	Provision to Disabled of Written	ı Info	ormation		
SEND Engagement and Market Development Officer	Local offer continues to be updated and includes easy read materials, uses video and other media to improve the accessibility of the information in conjunction with the parent carer forum		<ul> <li>Full review of Local Offer April 2022</li> <li>New Local Offer coproduced with parents/carers, children and young people and all appropriate partners March 2023</li> </ul>	New Local Offer accessible Improved feedback on Local Offer from parents / carers.	Comms Team

		Marketing and communication strategy for launching new Local Offer March 2023 including use of Social Media platform	Increased usage of Local Offer	
SEND Engagement and Market Development Officer	School SEND Information Report Pages are compliant	<ul> <li>Review of school Information Reports April 2022</li> <li>Schools informed of non- compliance May 2022</li> </ul>	Parents and others have compliant up-to-date information regarding the school SEND offer	All schools

#### **Appendix 1**

#### **Guidance for Schools Regarding Accessibility Plans**

Schools are required to have an **accessibility plan**. This is a statutory requirement (see DFE's guidance on statutory policies for schools).

The Equality Act 2010 came into force on 1 October 2010 and replaced all existing equality legislation, including the Disability Discrimination Act (DDA). The effect of the law is the same as the previous legislation, in that "schools cannot unlawfully discriminate against pupils because of their sex, race, disability, religion or belief and sexual orientation".

Advice from the Department for Education (DfE) on the Equality Act 2010 explains that schools must have an accessibility plan to comply with the Act, just as they did under the DDA. Schools must ensure that they are meeting their duties under the public sector equality duty (PSED), which replaced previous statutory duties for schools on race, gender and disability.

An accessibility plan is listed as a statutory document in the DfE's guidance on statutory policies for schools. The guidance also requires that the policy is:

- Reviewed and reported on annually and drawn up/updated every three years
- Approved by the governing body, who are free to delegate this to a committee of the governing body, an individual governor or the head teacher

Additionally, where disabled pupils are placed at a substantial disadvantage, schools must consider whether any reasonable adjustment can be made to overcome that disadvantage. This must be done within a reasonable time and in ways which are determined after taking account of the pupil's disabilities and any preferences expressed by them or their parents.

#### How should an accessibility plan be published?

An accessibility plan may be a freestanding document but may also be published as part of another document such as the school development plan.

For instance, a school may wish to publish its accessibility plan within an equality and diversity policy. A school's accessibility policy should be available on a school's website.

#### What should be included in an accessibility plan?

The DFE's advice (2014) makes it very clear that **schools continue to have a duty to produce an Accessibility Plan** which must be implemented. Schools' plans should reflect their intentions in three areas to:

- 1. Increase the extent to which disabled pupils can participate in the curriculum
- 2. Improve the **physical environment** of schools to enable disabled pupils to take better advantage of education, benefits, facilities and services provided, and
- 3. Improve the availability of accessible information to disabled pupils.

(paragraph 4.29-30)

- For each aspect there should be short, medium and long term targets
- Success criteria should be included
- The plan should identify who is responsible for each target
- Timescales for completion must be indicated
- Resource implications should be costed and source of funding identified.
- Systems of evaluation and monitoring must be included
- Training needs should be identified (related to targets)

#### **Appendix 2**

#### Accessibility Plan 2022 -2023

An accessibility plan must show how school access is to be improved for pupils/students, staff and visitors with disabilities in a given timeframe. It must anticipate the need to make reasonable adjustments wherever practicable. An Accessibility Plan must be reviewed at least every 3 years.

#### **Purpose of Plan**

The purpose of this plan is to show how our educational setting intends, over time, to increase accessibility to the physical environment, the curriculum and written information so that all pupils/students with a disability can take full advantage of their education and associated opportunities.

#### **Definition of disability**

'A person has a disability if he or she has a physical or mental impairment that has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities'. (Equality Act 2010)

#### **Key Aims**

To increase and eventually ensure for pupils/students with a disability that they have:

- total access to our setting's environment, curriculum and information and
- full participation in the school community.

#### **Principles**

- Compliance with the Equality Act is consistent with our setting's aims and equal opportunities policy and SEN information report.
- Our staff recognise their duty under the Equality Act:
  - Not to discriminate against disabled pupils in their admissions and exclusions, and provision of education and associated services
  - Not to treat disabled pupils less favourably
  - To take reasonable steps to avoid putting disabled pupils at a substantial disadvantage
  - To publish an accessibility plan
- In performing their duties governors have regard to the Equality Act 2010
- Our setting
  - recognises and values the young person's knowledge/parents' knowledge of their child's disability
  - recognises the effect their disability has on his/her ability to carry out activities,

- o respects the parents' and child's right to confidentiality
- The setting provides all pupils with a broad and balanced curriculum that is differentiated, personalised and age appropriate.

#### Increasing Access for disabled pupils to the school curriculum

This includes teaching and learning and the wider curriculum of the school such as participation in after school clubs, leisure and cultural activities or school visits

#### Improving access to the physical environment of the school

This includes improvements to the physical environment of the school and physical aids to access education.

#### Improving the delivery of written information to disabled pupils

This will include planning to make written information that is normally provided by the school to its pupils available to disabled pupils. Examples might include handouts, timetables, textbooks and information about school events. The information should take account of pupils' disabilities and pupils' and parents preferred formats and be made available within a reasonable time frame.

#### **Financial Planning and control**

The head teacher, SLT and the finance committee will review the financial implications of the accessibility plan as part of the normal budget review process.

### Appendix 3

Accessibility Action Plan Template - add rows as necessary

Compliance with the Equality Act						
Accessibility Outcome	Action to ensure Outcome	Who responsible	Long, medium or short-term	Time Frame	Notes	

Access to the physical environment - statutory						
Accessibility Outcome	Action to ensure Outcome	Who responsible	Long, medium or short-term	Time Frame	Notes	

Ensuring inclusion in the school community						
Accessibility Outcome	Action to ensure Outcome	Who responsible	Long, medium or short-term	Time Frame	Notes	

Access to the curriculum - statutory						
Accessibility Outcome	Action to ensure Outcome	Who responsible	Long, medium or short-term	Time Frame	Notes	

Access to information adv	ice and guidance - statutory				
Accessibility Outcome	Action to ensure Outcome	Who responsible	Long, medium or short-term	Time Frame	Notes

#### **Appendix 4 – Glossary**

CAMHS: Child and adolescent mental health service.

DAF: Disability Access Fund

DfE: Department for Education

Disability: Disability is a protected characteristic under the Equality Act 2010. Disability is a physical or mental impairment which has a

long-term and substantial adverse effect on their ability to carry out normal day-to-day activities.

ESFA: Education and Skills Funding Agency

HI: Hearing Impairment

ICT: Information Communication Technology

JSNA: Joint Strategic Needs Analysis

LA: Local Authority

NHS: National Health Service

OT: Occupational Therapist

PASS: Physical and Sensory Support

PMLD: Profound and Multiple Learning Difficulties

SEMH: Social, Emotional and Mental Health

SEN:

Special Educational Needs - The definition of Special Educational Needs (SEN) contained in the Children and families act is: 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 him or her. A child of compulsory school age or a young person has a learning difficulty or disability if he or she:

- has a significantly greater difficulty in learning than the majority of others of the same age, or
- has a disability which prevents or hinders him or her from making use of facilities of a kind generally provided for others of the same age.

SLD: Severe Learning Difficulty

SpLD: Specific Learning Difficulty

STPD: Specialist Teacher for Physical Disability

VI: Visual Impairment