City of London School Accessibility Policy

0. Review of policy

0.1 This policy will be reviewed where required (no more than every three years) prior to approval by governors.

Last reviewed by:	Andrea DiStefano (Head of Learning Support) Jane Elliott-Waine (Head of Facilities, Operations and Compliance)
Date last reviewed:	June 2024 (changes as shown)
Approved for Governors:	Board of Governors
Date approved:	7 October 2024

1. Introduction

1.1 City of London School ('the School') aims to ensure that all pupils, regardless of disabilities or learning needs, have equal access to the School. We have high expectations of all of our pupils and we strive to ensure that each and every pupil can take part in the whole school curriculum. We value the diversity of our school community and celebrate inclusion for all.

1.2 **Definition of 'disability'**

The Equality Act defines a 'disability' as when a person has 'a physical or mental impairment which has a substantial and long-term adverse impact on a person's ability to carry out normal everyday activities'. This has some overlap with the definition of 'Special Educational Needs' (SEN) in the Children and Families Act, but not all pupils are disabled by their SEN and vice versa. 'Disabled pupils', for the purpose of this policy, refers not only to those pupils with physical disabilities but could include, for example, those with health issues, including mental health, or learning disabilities if they meet the legal definition of 'disability'.

1.3 **Expectations of staff**

Staff have a responsibility to:

- Ensure that they do not treat a disabled person less favourably than someone else for a reason relating to the person's disability
- Not indirectly discriminate against a pupil with a disability by failing to make a reasonable adjustment when a disabled pupil is placed, or is likely to be placed, at a substantial disadvantage in comparison with a person who is not disabled (also see the School's Equal Opportunities Policy and the *Reasonable Adjustments* section below)
- Implement reasonable adjustments

- Ensure that if a pupil discloses a disability, the member of staff should request their permission, where appropriate, to share this information with relevant colleagues

1.4 This policy covers three aspects:

1.4.1 **Increasing the extent to which disabled pupils (including those with special educational needs) can participate in the School's curriculum**
This covers teaching and learning and the wider curriculum of the school such as participation in after-school clubs, leisure and cultural activities or school visits. It also covers entry into the school.

1.4.2 **Improving the provision of written information to disabled pupils, in particular that which has already been produced for pupils who are not disabled**
This will include planning approaches by which the school will make written information (e.g. handouts, timetables, textbooks and information about School events) more accessible to pupils with special educational needs and disabilities (SEND). The delivery of such information should be in ways which are determined after taking into account the pupils' disabilities and any preferences expressed by them or their parents, and be within a reasonable timeframe.

1.4.3 **Improving the physical environment of the School in order to increase the extent to which disabled pupils are able to take advantage of education and associated services offered by the School**
This covers improvements to the physical environment of the school and physical aids to access education.

1.5 The School is committed to meeting legislative requirements, providing access as defined above and nurturing a culture of inclusion, support and awareness. The School will not treat disabled pupils less favourably and will take reasonable steps (the 'reasonable adjustment' duty) to avoid putting disabled pupils at a disadvantage in matters of admission and education. As a result, the School has regard to the need to allocate adequate resources for the implementation of this policy.

1.6 This policy is written under the requirements of the SEND Code of Practice ('the Code') and Schedule 10 of the Equality Act ('the Act') (as outlined in the Independent School Standards Regulations), and sets out the School's strategy relating to improving access for disabled pupils, including those with learning difficulties. It draws upon the DfE guidance The Equality Act and schools .

1.7 This policy is closely linked to the School's Learning Support and Disability Policy and should be read in conjunction with that policy.

This policy should also be read in conjunction with:

- The Equal Opportunities (Pupils) Policy
- The Admissions Policy
- The Curriculum and Teaching and Learning Policy
- The Health and Safety, Fire Safety, and Security Policies

2. Reasonable Adjustments

2.1 **The 'Reasonable Adjustments' duty**
The duty to make 'reasonable adjustments' does not include a duty to change physical features. It does include a duty 'to take such steps as it is reasonable to have to take to provide auxiliary aids … where a disabled person would, but for the provision of the auxiliary aids, be put at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled'.

2.2 The term "auxiliary aids" found in the Act cover both auxiliary aids and services but there is no legal definition for what constitutes auxiliary aids and services. Examples of what may be considered an auxiliary aid could be hearing loops, adaptive keyboards and special software. There is no generic definition of what constitutes a 'reasonable adjustment'; the key test is reasonableness, which will always be specific to the pupil and context[1].

2.3 For further information about reasonable adjustments, please also see the School's Learning Support and Disability Policy and the School's Equal Opportunities (Pupils) Policy.

3. Increasing the extent to which disabled pupils (including those with special educational needs) can participate in the School's curriculum

3.1 When planning, teachers will need to set high expectations and provide opportunities for all pupils to succeed, including pupils with disabilities. They should plan their approaches to teaching and learning so that all pupils can take part in lessons fully and effectively. To create effective learning environments this will include:

- valuing all contributions
- ensuring pupils feel secure and able to contribute appropriately
- ensuring that all forms of bullying will be challenged

3.2 Many pupils with disabilities learn alongside their peers with little need for additional resources beyond the aids which they use as part of their daily life (e.g. a wheelchair, a hearing aid or equipment to aid vision). However, teachers must take account of potential barriers to learning and, where necessary, ensure in their planning that they make provision to support individuals or groups of pupils to enable them to participate as fully and effectively as possible in the curriculum and assessment activities. This may include adapting / modifying resources and / or making them more accessible, e.g. providing soft copies / printed copies of teaching material, ensuring font sizes and reproduced materials are fully accessible, etc. Potential areas of difficulty should be identified and addressed at the outset of work. Also, during assessments, teachers should bear in mind that reasonable adjustments may need to be made to support individual pupils.

[1] The Equality and Human Rights commission offers the Technical Guidance for Schools in England Reasonable Adjustments for Disabled Pupils.

3.3 Curriculum planning and assessment for pupils with SEND must take account of the type and extent of the difficulty experienced by the pupil. Disabled pupils may need access to specialist equipment and approaches or to alternative or adapted activities, consistent with school-based intervention augmented by advice and support from external specialists. Teachers should work closely with the Learning Support Department and, where appropriate, representatives of other agencies who may be supporting the pupil.

3.4 Teachers will need to plan for pupils' full participation in learning and in physical and practical activities through:

- using specialist aids and equipment
- providing support from adults or peers when needed
- adapting tasks or environments
- providing alternative activities, where necessary

3.5 Teachers should also take specific action to enable the effective participation of pupils with disabilities, for example by:

- planning appropriate amounts of time to allow for the satisfactory completion of tasks, for example by:
    - taking account of the very slow pace at which some pupils will be able to record work, either manually or with specialist equipment, and of the physical effort required
    - being aware of the high levels of concentration necessary for some pupils when following or interpreting text or graphics, particularly when using vision aids or tactile methods, and of the tiredness which may result
    - allocating sufficient time, opportunity and access to equipment for pupils to gain information through experimental work and detailed observation
    - being aware of the effort required by some pupils to follow oral work, whether through use of residual hearing, lip reading or a signer, and of the tiredness or loss of concentration which may occur.
- planning opportunities, where necessary, for the development of skills in practical aspects of the curriculum, for example by:
    - providing adapted, modified or alternative activities or approaches to learning in physical education and ensuring that these have integrity and equivalence to the curriculum and enable pupils to make appropriate progress
    - providing alternative or adapted activities in science, art and design and design and technology for pupils who are unable to manipulate tools, equipment or materials or who may be allergic to certain types of materials
    - ensuring that all pupils can be included and participate safely in geography fieldwork, local studies and visits to museums, historic buildings and sites, etc.
- identifying aspects of the curriculum that may present specific difficulties for individuals.

3.6 **Sports**

The Physical Education Department will need to make plans to consider provision for disabled pupils. Specifically, for disabled pupils who cannot access an activity, teachers will need to provide one or all of the following:

- adapted, modified or alternative activities that have integrity and equivalence to the activities followed by other pupils and that enable the pupils to make progress

- specific support to enable the pupils to participate in certain activities or types of movement
- careful management of the pupils' physical regime to allow for specific medical conditions

3.7 **Drama**
The Winterflood Theatre and Coulson Studio, where drama lessons and other activities often take place, have access difficulties (the Winterflood theatres has an access lift however, the Coulson Studio does not have step-free access). Reasonable adjustments will be made for disabled pupils to enable them to access drama activities.

3.8 **Recreational activities and School clubs and societies**
Most recreational areas for break and lunchtimes are accessible (although the Top Playground does not have step-free access). Most after-school clubs will be accessible (except possibly the CCF, where an alternative activity is already available). Access to school trips may require alternative forms of transport (e.g. a taxi instead of use of the Underground).

3.9 For further information about the School's curriculum, co-curricular provision and approaches to teaching, please see the School's Curriculum and Teaching and Learning Policy and the School's Learning Support and Disability Policy.

4. Improving the provision of written information to disabled pupils, in particular that which has already been produced for pupils who are not disabled

4.1 Written information provided to pupils in School covers a wide range of areas. Most obviously there is the curriculum material provided through visual presentations (including, for example, textbooks and worksheets). This can be complemented by written information on white boards, flip charts or interactive technologies. Accessibility issues are considered when new equipment is acquired by the School to ensure that the current and future needs of all pupils are met as far as is reasonable.

4.2 In addition to curriculum information there is the wide variety of other information provided by the School to its pupils (e.g. the class timetable, homework diary, a letter about a class excursion, the School's weekly newspaper, etc.). Where reasonable, this information will be provided in an accessible way to pupils with disabilities, recognising that different pupils are likely to require different arrangements in different situations.

4.3 Accessibility for all learners is considered when introducing and setting up new ICT hardware (e.g. interactive whiteboards / display screens), peripherals and software.

4.4 The City of London Corporation's Access Advisor can offer advice of support provided by external agencies for neurodivergences, support with braille, induction hearing loops or British Sign Language support.

5. Improving the physical environment of the School in order to increase the extent to which disabled pupils are able to take advantage of education and associated services offered by the School

5.1 Although the duty to make 'reasonable adjustments' does not include a duty to change physical features, the School has a planning duty which includes physical improvements to increase access to education and associated services. The School will continue to work towards improving access for the disabled and intends to make alterations to the physical features of the School as part of its long-term planning process. As a result, an Access Audit of the School was commissioned from external consultancy who are registered members of NRAC (National Register of Access Consultants)that report should be read alongside this policy. Actions arising from that Access Audit will be reviewed as part of the schools annual building improvements planning process.

5.2 **Wheelchair users**

The majority of the main school building is accessible to wheelchair users by way of the two lifts (on the South and North sides of the building). Portable ramps are available to enable access to some additional areas (including some external terraces).

6. Support for Specific Areas of Need

6.1 **Examples of implications of the reasonable adjustment duty for specific subjects**

It is important for teachers to make adjustments to help disabled pupils overcome difficulties presented by particular aspects of the teaching and learning programme, for instance by:

- using approaches to enable hearing-impaired pupils to learn about sound in science and music
- helping visually impaired pupils to learn about light in science, to access maps and visual resources in geography and to evaluate different products in design and technology and images in art and design
- providing opportunities for pupils to develop strength in depth where they cannot meet the particular requirements of a subject, such as the visual requirements in art and design and the singing requirements in music
- adjusting or discounting these aspects in appropriate individual cases when required to make a judgement or academic attainment.

6.2 **Access Arrangements**

The School's policy and procedures with regard to Access Arrangements in Entrance Examinations and Public Examinations are outlined in the following policies:

- Admissions Policy
- Learning Support and Disability Policy
- Exams Policy

6.3 **Working with external advisors**

The Learning Support Department, School Nurse and / or Pastoral and Wellbeing Advisor can be contacted by parents in relation to assessment of and on-going work with pupils.

Where appropriate, the School will make use of external advisors (e.g. medical practitioners and Educational Psychologists) and has access to a range of services through the City of London Corporation.

6.4 **Health and Safety**
There is a School Nurse on site daily during normal school hours who would oversee the administration of any medicines required for a disabled pupil. The School's health and safety procedures, including the procedures for evacuation of disabled pupils in the event of an emergency (Personal Emergency Evacuation Plans (PEEPs)), are described in the relevant policies, which are reviewed and revised where appropriate to incorporate the needs of disabled pupils.

6.5 For further information about provision for pupils with SEND, please see the School's Learning Support and Disability Policy.

7. Staff Training

7.1 It is recognised that there is a need to ensure that skills are more specifically developed to enable teachers to provide effectively for pupils with a range of disabilities. Staff training and development will take place to ensure that curriculum access is further enhanced.

7.2 Examples of training which may be sought by and provided to teachers include:

- ensuring access to text and supporting delivery of information in the three main areas of impairment (physical, hearing and visual), including through the use of different media
- differentiation and / or scaffolding
- developing ICT-based resources / templates which can provide a basis for effective information delivery (in both the curriculum and organisational/administrative aspects). Training will be provided on new ICT equipment to allow teachers to use special features to make teaching / resources more accessible to pupils with SEND.
- specialised areas (e.g. Brailing and BSL to ensure that effective communication can take place)

Appendix 1: Accessibility Plan July 2024 August 2027

1.1 The School's Accessibility Plan has been reviewed following the Access Audit conducted by an external access consultant during summer Term 2024.

1.2 Objectives are categorised according to the three aspects:

A. Increasing the extent to which disabled pupils (including those with special educational needs) can participate in the School's curriculum. (See below)
B. Improving the provision to disabled pupils of information which is already in writing for pupils who are not disabled. (See below)
C. Improving the physical environment of the School in order to increase the extent to which disabled pupils are able to take advantage of education and associated services offered by the School. (See below, we can also provide a copy of the Access Audit Action Plan, 2024 – 2027, on request to the Head of Facilities and Operations)

Table 1: Actions with regard to aspects A and B

Aspect	Target(s)	Strategies	Outcomes	Timeframe(s)	Goals achieved
A	As required for implementation of the Code, to ensure appropriate accommodations are in place for pupils with SEND (and other barriers to learning) attending the school, informed (in planning and review procedures) by the information retained on the Learning Support register, including: • Identifying pupils with SEND	Information about individual pupils' SEND has been available to staff online since 2014, with increased accessibility from 2015 with the introduction of a new database. The publication and use of this information will be subject to ongoing review. Further develop communication between Learning Support staff, School Counsellors and the Pastoral & Wellbeing	The Learning Support staff to have: • Identified and categorised pupils with SEND (including through screening of new pupils, and the use of internal and external assessors) • Put in place appropriate accommodations • Put in place appropriate	Ongoing from Summer 2024	Robust staff aware of pupils' SEND and appropriate classroom support measures.

	• Raising awareness amongst staff (see below) • Introducing appropriate reasonable adjustments, as required (see below) • Introducing appropriate access arrangements, as required (see below)	Advisor, Heads of Section the School Nurse, and Admissions Staff. To ensure effective communication between the HoLS (as SENCo) and Local Authority advisors where required.	ongoing 'assess, plan, do review' processes for these pupils The Head of Learning Support to have: • Contributed to the development of pupil tracking approaches (developed with Director of Studies), and analysis of performance of pupils with SEND relative to all pupils. • Reviewed (on an ongoing basis) the School's practices to ensure it is operating in line with the Code		
A	Head of Learning Support to play a greater role in the identification of and support for candidates with SEND during the Admissions' Process	Improve accessibility for pupils with SEND for the examination assessments - previously been enhanced; HoLS (and Director of Admissions) to review arrangements for Interview assessments.	Guidance to applicants and their parents enhanced. Interview tasks reviewed to ensure appropriate accessibility measures in place for pupils with SEND. HoLS and LS to join admissions interviewer(s) and participate in all appropriate interviews of applicants with SEND.	During 2018 admissions round, with further refinement during 2019 admissions round and ongoing refinements through 2023.	

A	Continue to raise staff awareness, through the provision of professional development, of their and the School's duties towards pupils with SEND	To provide staff training on SEND legislation and the School's provision, focussing on one (or more) specific areas of SEND each year.	Increased staff awareness of the roles and responsibilities of the Learning Support department and of all staff, and the school's approaches to identifying and supporting individual pupils with SEND	Staff INSET to be provided in Spring Term 2019. All new staff to receive LS induction. Thereafter ongoing.	All teaching staff attended INSET. All new staff (since Sept 2014) have received LS induction.
A	Improve provision of information to staff leading activities, trips and visits regarding pupils with SEND.	This information is readily available to staff through ISAMs, but the school aims to enhance liaison between the Learning Support Department and Visiting Music Teachers and staff leading activities (e.g. CCF), trips and visits.	Processes for the provision of SEND information to achieve parity with the equivalent process for the provision of medical information.	Provision of information to CCF staff by Spring 2018. Procedures for the provision of information for trips and visits to be reviewed (and improved, as required) by end of 2019.	Increased staff awareness of the application of reasonable adjustments for pupils in activities and on trips and visits.
A	Improve curriculum planning in light of feedback from staff and pupils' needs.	HoLS to liaise with HoDs and attend departmental meetings regularly to discuss pupils with SEND and approaches for supporting them in lessons. HoLS and LS staff to conduct Lesson Observations to inform development of teachers' skills.	Staff more fully able to recognise, anticipate and meet (through the provision of reasonable adjustments) pupils' needs. Staff to continue to provide differentiated teaching to maximise learning opportunities for all pupils.	HoLS to attend at least one departmental meeting for each department during 2018-19; thereafter visits to take place (at least) annually. HoLS and a designated member of the SMTto conduct SEND-focussed 'Learning Walks' during 2019-20.	Visits completed for 2018-19. Subsequently to be embedded as 'routine'.
B	Following the introduction[2] of new Application Forms, to continue to enhance access to Admissions' information	Produce a guidance booklet to raise awareness of the School's SEND provision (for current and prospective parents) and its application	Parents (and prospective pupils) to be able to access this information more readily.	By end of 2019-20 academic year; thereafter, ongoing review.	

[2] In 2017, following consultation between the Head of Learning Support and the SENCos of feeder schools.

	for prospective pupils and parents.	to the Admissions' processes (for prospective parents).			
B	To research (through an Action Research project in conjunction with the IoE) approaches to improve the availability of written / visual information in alternative formats.	*To be informed by outcome of Action Research project.* Teachers to be aware of pupils needs, and modifying (e.g. enlarging, printing in colours, etc., as appropriate) the written resources used in lessons, tests and exams.	When required, the School (in conjunction with the City of London Corporation) is able to provide written information in alternative formats. All pupils' reasonable adjustments and provided appropriately.	Research project to be completed during 2018. Application of learning from that project during 2018-19 and 2019-20 academic years. Provision of resources immediately and ongoing.	Improved dissemination of information, where required, through a range of approaches. Provision of resources achieved and regularly updated (and ongoing).
B	To ensure exam scripts are accessible to all pupils	HoDs, HoLS and Exams Officer to liaise with Exam Boards to ensure provision of appropriately modified scripts in public exams. HoDs to ensure access arrangements are provided (in line with JCQ guidelines) in internal tests and exams.	Tests and Exams are presented in a format which all pupils can access, including those with SEND. Individual access arrangements to be in place for individual pupils, where required, including: • Word processors • Touch typing software • 'Reading' pens • Colour overlays • Ear plugs • White noise machines • Foreign language keyboards • Individual rooms / invigilators for pupils requiring rest breaks	Provision of exams immediately and ongoing.	Provision of exams achieved (and ongoing).

Table 2: Potential actions with regard to aspect C

Aspect	Target(s)	Strategies	Outcomes	Timeframe(s)	Goals achieved
C	Improve access for pupils with reduced mobility to Grove Park and School Trips	Upgrade School minibus fleet to include a vehicle with the ability to transport wheelchair-bound pupils, where the need is identified	School able to transport wheelchair-bound pupils.	Ongoing with review in 2025- 2026	
C	Over time, improve access for pupils with reduced mobility to areas of the school as identified in the 2024 Access Audit (e.g. the Courtyard) and to other areas where access is restricted	To incorporate disability awareness within the planning process for refurbishment and new building work.	Areas of the school with restricted access to be made more accessible to pupils (and staff and visitors) with restricted mobility.	Ongoing	
C	Improve fire safety systems	Review visual alarms systems in areas where individuals may be alone, assess communication systems at refuge points	Pupils safety improved during emergency situations	Ongoing	
C	Improve access to hearing loops	To undertake a review of locations to install hearing loops in the building	Improved experiences of pupils, staff and visitors with hearing aids.	Ongoing	