

**Salford City Council
Accessibility Strategy**

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Our vision...

Every child and young person aged 0-25 with SEND will have the fullest opportunity to be happy, healthy and achieve their full potential.

It is recognised that a sense of belonging to your local school and community is an essential part of this vision.

Commitment to Inclusion

City of Salford strives to provide all children with the opportunity to maximise their potential and be included in their community. The Local Authority (LA) recognises that to do so means providing a wide range of individual and often complex services to meet their needs. Avoiding discrimination and promoting equality supports the agenda of improving attainment and progression for children and young adults with Special Needs and Disabilities (SEND Learners 0-25)

The Authority will keep in mind a range of key principles, including:

- Inclusion is a process by which education providers, Local Authorities and others develop their cultures, policies and practices to include SEND learners 0-25.
- an inclusive education service offers excellence and choice and incorporates the views of parents and SEND Learners 0-25.
- the interests of all SEND Learners 0-25 must be safeguarded; and education providers, Local Authorities and others should actively seek to remove barriers to learning and participation.

The Authority believes that education inclusion is about equal opportunities for all whatever their age, disability, gender, ethnicity, attainment or background. It subscribes to Ofsted's view that:

An inclusive education establishment is one in which the teaching and learning, achievements, attitudes and wellbeing of every young person matter. Effective (education establishments) are educationally inclusive. This shows not only in their performance, but also in their ethos and their willingness to offer new opportunities to pupils (and students) who may have experienced previous difficulties. This does not mean treating all in the same way. Rather it involves taking account of (each individual's) varied life experiences and needs.

What is an Accessibility Strategy? The Legal Framework

An accessibility strategy sets out the Local Authority's support children and young adults, aged up to 25, who are disabled to enable them to enjoy a good education and not be disadvantaged, therefore meeting the Equality Act 2010.

The overarching principle of The Equality Act is to:

- Eliminate discrimination and other conduct that is prohibited by the Act;
- advance equality of opportunity between people who share a protected characteristic and people who do not share it;
- foster good relations across all characteristics, between people who share a protected characteristic and people who do not share it.
- The purpose of the strategy is to:
- increase the extent to which disabled children and young adults can participate in academic and vocational learning;
- improve the physical environment of education establishments, thereby increasing the extent to which disabled pupils and students are able to take advantage of teaching and learning opportunities and benefits, facilities or services provided or offered;
- improve the delivery of information to disabled pupils and students which is also readily accessible to those who are not disabled.

All education establishments are required to keep under review and publish an Accessibility Plan and related information on their website.

Published plans must have regard to the need to provide adequate resources for implementing plans and must be regularly reviewed.

Local Authorities must, for the schools and other education establishments for which they are responsible, prepare an accessibility strategy based on the same principle as the accessibility plans for schools.

This does not apply to academies, PFI funded schools or private nursery providers on school sites. Owners/governing bodies of these provisions must produce their own accessibility strategy in accordance with the Equality Act. 5

Principles

The City of Salford will seek to ensure that all maintained schools and other education establishments for which it is responsible do not disadvantage or discriminate against a disabled pupil because of their disability.

The Equality Act 2010 defines a disability as “when a person has a physical or mental impairment which has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities”.

This broad description covers physical disabilities, sensory impairments, such as those affecting sight or hearing, and learning disabilities. Some specified medical conditions such as HIV, multiple sclerosis and cancer are all considered as disabilities, regardless of their effect.

The Act sets out details of matters that may be relevant when determining whether a person meets the definition of disability. **Long term** is defined as lasting, or likely to last, for at least 12 months.

A public body (in this case, a school) must not disadvantage a disabled pupil because of something that is a consequence of their disability, such as preventing a wheelchair user from working with their normal class group because a lesson is scheduled in an upstairs classroom which has no access by lift. The interpretation of “**discrimination**” in relation to disability in this accessibility strategy reflects changes specified in the Equality Act 2010.

There can no longer be justification for **direct discrimination** in any circumstances (under the previous Disability Discrimination Act, schools could justify some direct discrimination – if it was a proportionate means of meeting a legitimate aim).

This accessibility strategy also seeks to protect disabled children and young adults against **indirect discrimination** – to ensure that an education establishment does not do something which applies to all but which is more likely to have an adverse effect on disabled pupils and students only.

The local authority will offer advice and guidance to managers and governors of education establishments on reasonable adjustments which will allow disabled pupils and students full access to facilities and activities. Responsibility for making reasonable adjustments rests with the setting concerned. If the adjustment is documented in an Education Health and Care Plan (EHCP), the Local Authority has ultimate responsibility to ensure it is made. In the Equality Duty 2011, the duty to make **reasonable adjustments** applies only to disabled people. For education establishments, this duty is summarised as follows and this accessibility strategy recognises and promotes these principles:

Where an action by an education establishment places a disabled pupil at a disadvantage compared to other pupils, then the establishment must take reasonable steps to try and avoid that disadvantage.

In addition to having a duty to consider reasonable adjustments for particular disabled pupils, establishments will also have to consider potential adjustments which may be needed for disabled pupils or students generally, as it is likely that any establishment will have a disabled pupil or student at some point.

It is important to note that the duty on establishments to make reasonable adjustments is anticipatory. Establishments should not wait until a disabled pupil or student arrives before making or planning to make adjustments. This may be too late and could lead to a pupil or student being substantially disadvantaged. It is important therefore for establishments to

plan a broad range of accessibility improvements over time. In accessibility planning, education establishments are not obliged to anticipate and make adjustments for every conceivable disability and need only consider general reasonable adjustments, for example, being equipped to produce large font papers for pupils with a visual impairment even if there are none currently admitted to the school.

It will be for establishments to consider the reasonableness of adjustments based on the circumstances of each case, as the Equality Act does not set out what would be a reasonable adjustment or a list of factors to consider in determining what is reasonable. However, factors that may be considered when assessing the reasonableness of an adjustment may include the financial or other resources required for the adjustment, its effectiveness, its effect on other pupils, health and safety requirements and whether aids should be made available from other agencies through the Education Health & Care Assessment process introduced in 2014.

What would be a reasonable “adjustment” is often a matter of judgement and, wherever possible, should be decided by agreement between the local authority, the education provider and parents/carers or, in the case of over 16s, the student themselves. For example, the right of a pupil or student to attend an establishment of their choice (within the context of City of Salford’s admissions procedures) should be balanced with the responsibility of the council to make the most efficient use of its resources – see Annex A for further clarification.

Implementing the Principles

All maintained schools and other education establishments will be required to have an accessibility plan, informed by City of Salford Council’s Accessibility Strategy, which is regularly reviewed. This is the responsibility of the governing body. As part of this regular review, establishments will also need to have regard to the need to provide adequate resources for implementing plans and must regularly review them.

An accessibility plan may be a freestanding document but may also be published as part of another document such as the school development plan. It must be freely available and easily accessible to parents/carers.

Hard copies should be available on request. Also on request, the establishment should be prepared to make available versions of the plan which would be accessible to parents with different communication needs (including alternative languages). Similarly, written information for disabled pupils needs to be given in formats that take account of their specific disabilities and the views expressed by the pupils and their parents about their preferred means of communication.

Resourcing the Strategy

Additional provision to enable pupils and students with learning difficulties to access the curriculum is already delivered through the SEN framework and this will cover the needs of many disabled children and young people into adulthood.

To deliver the outcomes in this Strategy, appropriate national and local funding streams should be directed toward the priorities identified. The LA will continue to explore and review both the efficiency and effectiveness of services it commissions and would expect educational settings to do the same. Wherever possible, the LA will seek to develop or enhance services in conjunction with relevant key partners.

Monitoring and Review Arrangements

The Accessibility Strategy will be kept under review and amended as necessary to reflect newly published legislation and statutory guidance, developments in local resources and service delivery, and progress against the action plans.

A. Increasing Participation in the School Curriculum

Schools are responsible for providing a broad and balanced curriculum for all pupils and have a key role in planning to increase access to the curriculum for disabled pupils. The curriculum covers not only teaching and learning but the wider curriculum of the school such as participation in after school clubs, leisure, sporting and cultural activities or school visits. The curriculum should provide relevant and challenging learning to all children. It should follow the three principles set out in the National Curriculum inclusion statement:

- setting suitable learning challenges
- responding to pupils' diverse learning needs
- overcoming potential barriers to learning and assessment for individuals and groups of pupils.

Schools should consider the needs of a range of disabled pupils and prospective pupils, but they are not obliged to anticipate every imaginable disability and need only consider general reasonable adjustments for pupils that might attend in the future - e.g. being prepared to produce large font papers for pupils with a visual impairment even though there are no such pupils currently admitted to the school.

Additional provision to enable pupils with learning difficulties to access the curriculum is already delivered through the SEN framework and this will cover the needs of many disabled children and young people into adulthood. The LA recognises that establishments are likely to require advice and guidance to help ensure they maximise their ability to respond to diverse needs.

Schools are expected under the Code of Practice (2015) to communicate regularly with parents and pupils about individual targets in all areas of the curriculum that are impacted by the pupil's disability and consider their views.

External Resources Available to Schools

Through various specialist teams and services, the LA promotes the inclusion and attainment of children and young people with special education needs (SEN), helping schools and settings develop their capacity and expertise through the implementation of effective policies and practices, so that children and young people with additional needs are included in all aspects of school/setting life and make good progress.

The Local Authority expects schools to draw upon the knowledge and guidance of the Educational Psychology Service and other targeted and specialist services to advise on meeting the needs of pupils with learning, social, emotional and communication difficulties. Similarly, they are expected to draw upon the knowledge and guidance of health professionals to enhance their provision for specific needs such as diabetes, epilepsy, children requiring emergency medication or enteral feeding (gastrostomy tubes & naso-gastric tubes), tracheostomy care, use of inhalers and nebulisers, and administering and storing medication. Necessary guidance and training in relation to significant medical needs would be part of a pupil's individual care plan.

The LA works closely with partners to ensure timely identification of those children and young people with the most complex and long-term SEND. Where appropriate and necessary this includes completion of statutory assessment and subsequent appropriate

review and monitoring as required by the Education Act 1996, Children and Families Act 2014 and related SEND Codes of Practice.

The LA, with partners, continues to review the range of specialist provision available to City of Salford children and young people to ensure development and change that corresponds with increasing or changing patterns of demand for services.

Funding for special educational needs is available to mainstream schools through their notional SEN budget. This can be further topped up by the LA from the high needs budget via Education, Health and Care Plans where the necessary criteria are met.

In line with the School Organisation Plan 2019-2025 the LA will use the information for individual needs to make reasonable adjustments to premises and review the offer of Enhanced Resource Provision across the mainstream setting. SEND capital fund will be used for larger projects to help meet the broader strategic aims for the commissioning of places.

B. Improving the Physical Environment of Schools

This strand of the planning duty includes improvements to the physical environment of the school and physical aids to access education. The physical environment includes steps, stairways, kerbs, exterior surfaces and paving, parking areas, building entrances and exits (including emergency escape routes), internal and external doors, gates, toilets and washing facilities, lighting, heating, ventilation, lifts, signs, interior surfaces, floor coverings, room décor and furniture. Improvements to physical access might include - ramps, handrails, lifts, widened doorways, electromagnetic doors, adapted toilets and washing facilities, adjustable lighting, blinds, induction loops, well designed room acoustics and way-finding systems. All new school buildings have to comply with the Building Regulations and The Education (School Premises) Regulations 1999 and should be physically accessible to disabled pupils. However, much of the work in this area will involve improving access to existing buildings. Improved access to the physical environment can be achieved by rearranging room space, removing obstructions from walkways, changing the layout of classrooms and designated storage space or by reallocating rooms for specific and/or specialist use.

When planning to improve the physical environment, schools should consider the needs of individual pupils or groups of pupils including:

- Pupils with complex physical impairments who may use a wheelchair to move around school.
- Pupils with less complex physical impairments, who are ambulant, but still require some adaptations, special considerations or adjustments to the school environment.
- Pupils with a sensory impairment or other difficulty requiring adaptations to the school environment or the presentation of information in appropriate formats.
- Pupils who, for a variety of reasons, require specialist toilet and changing facilities.

In addition to having a duty to consider reasonable adjustments for particular disabled pupils, schools also have to consider potential adjustments which may be needed for disabled pupils generally as it is likely that any school will have a disabled pupil at some point

However, schools are not obliged to anticipate and make adjustments for every imaginable disability and need only consider general reasonable adjustments. The LA is committed to developing the range of provision available across the borough with the aim that children are able to access an adapted school within their local area, and recognises that schools are likely to require external support when looking to make improvements of this nature.

The LA facilitates specialist advice and guidance for schools from specialist key partners such as occupational therapists, physiotherapists, speech and language therapists and the pan-Dorset Hearing and Vision Support Services.

The LA also manages a variety of capital projects across the borough including the rebuilding, remodelling and refurbishing of primary, secondary and special schools. Accessibility is built into all capital projects taken forward by the local authority and is expected of any school managed project.

External Resources Available to Schools

Through various specialist teams and services, the LA provides advice to schools about, for example, improving the acoustic environment for pupils with hearing impairment, the reduction of glare and the improvement of signage for pupils with visual impairment, and reasonable adjustments to the physical environment for pupils with mobility difficulties. 11

Physiotherapists can advise a school about an individual pupil's mobility and physical development. This might include things like co-ordination and ability to sit, stand and walk. They can advise the school on how best to help the child develop physically, to keep the child as mobile as possible and on any appropriate specialist equipment or adaptations to the environment.

Occupational Therapists can advise a school about using activity-based therapies to help raise an individual pupil's self-esteem and to encourage them to be as independent as possible. They will also advise on any appropriate specialist equipment or adaptations to the school environment if required.

The LA also manages a variety of capital projects across the borough including the rebuilding, remodelling and refurbishing of primary, secondary and special schools. Additional funding is available to schools for:

- minor adaptations to the physical environment such as ramps for wheelchair users.
- items of specialist equipment such as hoists and changing tables for pupils with toileting and other personal care needs.

Adaptations to Buildings

The Equality Act 2010 places a duty on schools and local authorities to make "reasonable adjustments" to facilitate access to education provision for disabled pupils. This can mean that the school and/or the local authority is required to invest in making physical adaptations to the site and buildings, in order to ensure that pupils can access the curriculum as fully as practicably feasible.

In each case, it is for the school to determine whether they would envisage an issue with pupils accessing the education offer in advance of the issue materialising. The school should make an initial assessment of the situation and, if it is evident that the need can be met via minor adjustments that would typically be paid from a school's budget (e.g. painting, signage etc.), it would be expected that such adjustments would be deemed to be "reasonable" and therefore implemented and paid for by the school.

If, however, significant capital works are required, the school should discuss with the local authority whether there are any capital maintenance funds available to support a project at that time. Although Salford has a high level of delegated funding for buildings the LA will work closely with the school to support a solution.

Typically, works in this category would involve an alteration to the structural fabric of the building and/or site and could include, for example, the installation of a lift, ramps, canopies, changing facilities etc.

In such cases, the local authority will typically send out its designated officer, with a surveyor, to assess the scale of the works required and the cost entailed. This assessment will enable the local authority to determine what form of adjustments would be deemed "reasonable" in any given instance, on the basis of a cost-benefit analysis, in which the financial implications will be considered against the perceived education benefit that would be derived from the adaptations in question.

Whilst the local authority is committed to ensuring equal access to education for all, it does also have a duty to utilise its resources in the most effective manner, so adjustments will not automatically be funded, especially if they entail significant expenditure. Should funding for a package of works be granted by the local authority, it would be expected that such works would be undertaken and paid for by the council directly. In this respect, early notification of potential access issues by schools is especially important, so as to ensure that the local

authority can provide a timely response that meets the needs of both the school and pupil(s) in question.

C. Improving the Delivery of Information

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

The information might include handouts, timetables, and information about school events. Schools might consider providing the information in alternative formats (such as large print and audio tape) using ICT, or providing the information orally.

The School Information (England) (Amendment) Regulations 2017 specifies the minimum requirements for information which must be provided on school websites and reproduced as a paper copy without charge for any parent who asks for it. School websites must be reviewed annually and include:

- The name, postal address and telephone number of the school, and the name of a person to whom enquiries should be addressed;
- The admission arrangements for the school, including any selection or oversubscription criteria, or guidance on how to access such information on the LA's website;
- Information as to where and by what means parents may access the most recent report about the school published by her Majesty's Chief Inspector of Education, Children's Services and Skills.
- The school's most recent key stage 2 and key stage 4 results as published by the Secretary of State in the School Performance Tables published on the Department for Education's website
- Information as to where and by what means parents may access the School Performance Tables published by the Secretary of State on the Department for Education's website.
- Information about the school curriculum including the content of the curriculum followed by the school for each subject and details as to how additional information relating to the curriculum may be obtained; the names of any phonics or reading schemes in operation; a list of the courses offered at key stage 4 which lead to a GCSE qualification; and a list of other courses offered at key stage 4 and the qualifications that may be acquired.
- The School's Behaviour Policy
- The amount of the school's allocation from the Pupil Premium grant in respect of the current academic year; details of how it is intended that the allocation will be spent; details of how the previous academic year's allocation was spent, and the effect of this expenditure on the education attainment of those pupils at the school in respect of whom grant funding was allocated.
- The School's policy for pupils with special education needs

The LA aims to provide a comprehensive on-line information resource about the Council and its services, providing web pages that meet the World Wide Web Consortium (W3C) 'Web Accessibility Initiative's Double-A' standard, and encourages schools to follow the same standards and guidelines to ensure that their sites can be used as easily as possible by everyone.

Where appropriate the LA facilitates specialist advice and guidance to schools from specialist key partners to improve the delivery of information to children and young people with SEN and disabilities and their families in a range of ways including:

- Advice on appropriate communication strategies, for example the use of British Sign Language and Visual Aids;
- Advice on other strategies and resources;
- Training on the presentation of written materials and differentiated information
- Support groups for families

SEND Information Advice and Support Service (SENDIASS).

This dedicated service is for children and young people with special education needs and disabilities and their families. Young people can also access the service independently from their parents. The service is impartial, confidential, and free. It is built on the existing support from the Parent Partnership Service, parent/carer liaison officers, City of Salford Parent Carer Forum and other local services for young people.

They can provide support around:

- Local policy and practice
- The local offer
- Personalisation and personal budgets
- Education law on SEN and related law on disability, health and social care

Parent Carer Forum

City of Salford Parent Carer Forum provides a central voice for all parents and carers of children/adults with SEN/ complex learning/ medical needs and disabilities that live in City of Salford. The Forum monitors and helps shape participation and awareness with parents. It works to influence and shape current and future service provision for City of Salford families.

<http://www.parentcarerforum.co.uk/>

The 'Local Offer'

The SEND reforms require every authority to produce a web based 'Local Offer'. The **local offer** brings together information for children and young people with special education needs and disabilities and their families. In City of Salford, we have worked with parents, carers, colleagues in other services, voluntary sector partners and other stakeholders to develop our local offer which is a growing body of information.

<https://www.salford.gov.uk/children-and-families/local-offer-for-children-and-young-people-with-sen-or-disabilities/>

Other useful information that can be found within the local offer includes:

- • City of Salford Children's Trust

- • Children's Centres

- • Short Breaks

- • Direct Payments

- • Health Visitors

- • Grants and Funding

- • Benefits Advice

- • Community Transport Services

- • Moving into Further Education

- • School and Post 16 Transport

- • Preparing for Adulthood

- • Council for Disabled Children

- • Pupil Premium

- • Equipment to help at home

- • Children with a disability

Glossary

Protected characteristic – age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, pregnancy and maternity.

Special Educational Needs - The term 'special educational needs' has a legal definition, referring to children who have learning problems or disabilities that make it harder for them to learn than most children of the same age.

Academies - Academy schools are state-funded schools in England which are directly funded by the Department for Education and independent of local authority control.

Code of Practice – Special Educational Needs and Disability Code of Practice (0-25 years) explains the duties of local authorities, health bodies, schools and colleges to provide for those with special educational needs under part 3 of the Children and Families Act 2014.