

# **Gloucestershire Accessibility Strategy 2020-22**

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## Gloucestershire Accessibility Strategy 2019-22

The Gloucestershire County Council (GCC) has set out its ambitions for Education Services in Gloucestershire in its Council Strategy 2019-22. The priorities outline the commitment to:

- Make sure children have access to a good quality education
- Help children and young people with additional needs to learn and succeed
- Develop skills for the future

The strategy can be viewed here: [Council's Strategy 2019-2022](#)

The Council has a legal duty to prepare an accessibility strategy for the schools and settings for which it is responsible under the Equality Act (2010). ([Equality Act 2010](#))

The strategy sets out how the Council (GCC) as the Local Authority (LA) will support schools and settings, for which it is the responsible body, to comply with these duties and other educational settings; including those for Early Years and Post 16.

All schools, including academies and free schools, should have an accessibility plan which is based upon the same principles as the accessibility strategy. Multi-Academy accessibility plans may take into account cross county differences (where they cover more than one local authority area) but should work within the framework set out by Gloucestershire's Accessibility Strategy. Further work is being undertaken nationally to ensure that expectations on Multi-Academy Trusts have increased clarity. This Strategy works in tandem with the national guidelines for accessibility and will periodically be reviewed and amended to ensure that it reflects changes in national policy and guidelines.

### **Public Sector Equality Duty**

In addition to meeting the specific requirement set out in Schedule 10 of the Equality Act, the accessibility strategy will also help the Council meet the Public Sector Equality Duty (PSED) with regard to disabled pupils.

The PSED applies to all protected characteristics:

- Race
- Disability
- sex
- age
- religion or belief
- sexual orientation
- pregnancy and maternity
- marriage and civil partnership
- gender reassignment

The PSED requires public bodies to understand the need 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

Promoting equality and addressing health inequalities are at the heart of Gloucestershire County Council's values. Throughout the development of the accessibility strategy for 2020-2022 we have:

- Given due regard to the need to eliminate discrimination, harassment and victimisation, to advance equality of opportunity, and to foster good relations between people who share a relevant protected characteristic (as cited under the Equality Act 2010) and those who do not share it; and
- Give regard to the need to reduce inequalities between children and young people in access to, and outcomes from, schools and educational settings and to ensure services are provided in an integrated way to ensure equal opportunities and fair access.

## 1. Introduction

Improving access to education and educational achievement by disabled Children and Young People (CYP) is essential to the Government's policy of ensuring equality of opportunity, full participation in society and the economy. (*Reference: Children & Families Act 2014* ).

GCC is committed to ensuring that all CYP with special educational needs and disabilities (SEND) experience a high quality of life and education and achieve the best possible outcomes.

This document explains GCC's strategic approach to ensuring equality of access to education provision for CYP including young people with SEND and should be read in conjunction with:

- Gloucestershire's Joint Strategy for Children & Young People with Additional Needs, including SEND 2018-2021
- Gloucestershire's SEND Local Offer - which sets out information about the provision available for CYP with SEND Gloucestershire; the Local Offer is delivered through glofamilies directory
- Gloucestershire County Council's SEND Commissioning Strategy 2019-2024
- Gloucestershire County Council's Post 16 Education Vision (Preparing for Adulthood) 2019-2022

- Building Better Lives Policy 2014 - 2024
- Gloucestershire's Graduated Pathway of Early Help & Support
- Guidance Booklet for Practitioners Working with CYP with Additional Needs, including SEND
- Joint Engagement & Participation Strategy 2019-2021

## **2. Gloucestershire's Vision**

Gloucestershire has high aspirations for the achievement of all our CYP and is committed to ensuring our students thrive, access their full educational entitlement and have the right support to meet their potential. The Council's Strategy 2019-2022 outlines its ambitions and commitment to accessibility and opportunity for all Children and Young People (CYP).

### **2.1 Guiding Principles**

- The Council aims to support all CYP to learn within or close to their local community wherever possible.
- All CYP are entitled to have their educational needs met in local mainstream provision. CYP with SEND will have their needs met in mainstream settings, schools and colleges whenever possible.
- GCC is committed to the Person Centred Principles on which the SEND reforms are based:
  - the views, wishes and feelings of the CYP must be taken into account
  - their parents/carers views must be taken into account
  - the CYP and their parents/carers must be able to participate as fully as possible in decision making, and be provided with the necessary information and support to achieve that decision
  - the CYP and their parents/carers must be supported to help the CYP to effectively prepare for adulthood
- The preferences of parents/carers and CYP for naming a particular educational setting or school, college or other institution will be very carefully considered in the context of suitability, efficient education of others and efficient use of resources and in accordance with the statutory guidance within SEND Code of Practice 0 to 25 years (January 2015).
- GCC will commission a wide range of provision across the authority and actively support families, settings, schools and colleges so that the majority of CYP's special educational needs can be met within mainstream settings.
- Special School or Specialist College provision will be considered when a CYP's outcomes cannot be achieved in a mainstream setting. This decision

will be supported by evidence that mainstream options have been fully explored and evidence from professionals indicating that a specialist education placement is required to meet the CYP's outcomes and needs.

- If provision in a specialist setting is necessary, it should be as local as possible, and regularly reviewed with a view to a possible transfer to a mainstream option, if appropriate, as outcomes are achieved.
- Residential special educational placements will be considered if the following criteria is met in line with our commissioning strategy:
  - CYP have medical or care needs that cannot be supported in mainstream day provision;
  - CYP live beyond reasonable travelling distance to the nearest appropriate education setting; for Young People (YP) over 16, reasonable travelling distance is where the journey time would be over 75 minutes travelling time;

For young people aged 16 – 25, their assessment needs to demonstrate an essential element of their education can only be provided in a residential setting. Separate guidance for Post 16 Education for High Needs Students sets out the criteria for decisions on requests for independent educational placements in schools and colleges

- GCC strongly endorses the view that all CYP, including those with disabilities, should be able to access after-school clubs/homework clubs etc. including independent child care clubs in schools and settings, and encourage all settings to demonstrate due regard to accessibility for all as part of the their planning.
- GCC strongly endorses the view that all CYP must have access to other learning activities, such as field trips or school camps, where issues regarding accessibility and availability of resources to support the CYP for long periods of the day needs consideration and resolution.
- GCC strongly supports effective multiagency working to enable disabled CYP to be able to thrive, access their educational entitlement and to fulfil their potential. We work with our local National Health Services (NHS) which includes Gloucestershire's Clinical Commissioning Group; Gloucestershire Health and Care NHS Foundation Trust; and Gloucestershire Hospitals NHS Foundation Trust, to ensure that CYP support is holistic.

## **2.2 Current Context**

A wide spectrum of educational provision is commissioned in response to the needs of CYP in Gloucestershire. GCC has developed and published its Local Offer which sets out information about the provision available and additionally in the Intervention Guidance. The educational provision comprises of universal and specialist provision

## Universal Provision

<b>Early Years settings</b>	
There are a range of Early Years Education Providers; offering Early Years education and childcare	376 childminders 371 day care settings 74 home child carers
<b>Primary Schools</b>	
Infant	13
Junior	14
Primary (Infant and Junior)	162
<b>Total Maintained</b>	<b>189</b>
<b>Primary Academies &amp; Free Schools</b>	
Infant	45
Junior	4
Primary (Infant and Junior)	48
<b>Total Academies &amp; Free Schools</b>	<b>57</b>
<b>Total Primary</b>	<b>246</b>
<b>Secondary Schools</b>	
11-16	3
11-18	2
<b>Total Maintained</b>	<b>5</b>
<b>Secondary Academies</b>	
11-16	10
11-18	24
<b>Total Academies</b>	<b>34</b>
<b>Free schools</b>	<b>1</b>
<b>Total Free schools</b>	<b>1</b>
<b>Total Secondary</b>	<b>40</b>

## Specialist Provision

Special Schools		Provision
<b>Maintained</b>	6	For Children and Young People (CYP) with moderate, severe and additional learning needs or profound and multiple learning difficulties including complex difficulties
<b>Academies &amp; Free Schools</b>	6	For CYP aged 5 - 16 with severe behavioural, emotional and social difficulties comprising 1 primary and 2 secondary special academies. 1 Alternative provision school for CYP aged 11-18
<b>Specialist Post 16 Provision attached to special schools</b>	3	For students (aged 16-19) with severe or profound learning difficulties including complex difficulties from across the county
<b>Alternative Provision Schools</b>	3	For CYP who have been excluded from their mainstream schools either on a permanent or fixed time basis

		The APS also support pupils on a short time basis who are at risk of being excluded.
<b>Hospital Education Service</b>	1	For CYP who are within the compulsory school age (5 – 18) aged with short and long term medical needs in addition to support for pregnant teenagers and young mothers
<b>Specialist centres for communication and interaction needs including autism</b>	6	For CYP with communication and interaction difficulty that has a severe/profound impact on the student's ability to access the social and academic curriculum but who benefit academically and socially from a mainstream setting comprising 5 Primary Centres 1 Secondary Centre

### 3. The Legal Position - Statutory Responsibility

- 3.1 GCC has a legal duty to prepare a countywide accessibility strategy for the schools and settings for which it is responsible under the Act and sets out how the LA will support schools, for which it is the responsible body, to comply with these duties. It has elected to extend this duty to other educational settings including those for Early Years and Post 16 within the context of suitability and efficient use of resources.
- 3.2 Academies and free schools, maintained schools, Early Years settings, Post 16 settings, independent schools and non-maintained special schools must produce their own accessibility plan.
- 3.3 This accessibility strategy builds on previous Gloucestershire Accessibility Strategies from 2009 onwards (see Appendix 1) and aims to:
- increase the extent to which disabled CYP can participate in the school curriculum;
  - improve the physical environment to increase the extent to which disabled CYP can take advantage of education and associated services;
  - improve the access to disabled CYP of written information which is provided to CYP who are not disabled and where necessary alternative communication to written information
- 3.4 Through their Governing Board, schools and settings are required to have an accessibility plan, provide adequate resources for implementing it and must regularly review it every three years. An accessibility plan may be published as part of another document such as the school development plan but it must be freely available to parents/carers.

### 4. Definitions and Legal Framework

- 4.1 The Equality Act 2010 and related Equality Duty 2011, replace the duties upon schools and settings as laid out in the previous Disability Discrimination Act 1995 (DDA).



- 4.2 The Equality Act 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 in addition to impairments with fluctuating or recurring effects such as rheumatoid arthritis, myalgic encephalitis, chronic fatigue or depression. It will also include some specified medical conditions such as HIV, multiple sclerosis and cancer and mental health conditions with symptoms such as - anxiety, panic attacks, phobias and eating disorders, bipolar affective disorders, obsessive compulsive disorders, personality disorders, post traumatic stress disorder, and some self-harming behaviour and mental illnesses, such as depression and schizophrenia.

The effect must be:

- substantial (defined as more than minor or trivial)
- adverse (unfavourable or injurious)
- long-term (lasting or liable to last for at least a year or as long as a person lives)

## 5. The Planning Duty

There are three strands to the planning duty. The following sections provide details of the Gloucestershire strategy for each of the three strands.

- 5.1 The Gloucestershire strategy focuses on helping schools and settings to increase the accessibility of the curriculum to disabled CYP by securing appropriate staff training and encouraging schools and settings to work together and share good practice. We want:

- every disabled CYP to access a high quality educational experience and achieve the best possible outcomes;
- every CYP with SEND to be assessed and needs met via Early Help/Gloucestershire Graduated Pathway as early as possible;
- robust and accessible Information available through Early Help , the Local Offer via Gloucestershire Families Directory, Information for Practitioners and Help line: [SEND Local Offer](#);
- to actively support schools and settings so the majority of CYP’s SEND needs can be met within mainstream settings

Setting capacity to meet need and increase the extent to which disabled CYP participate in the school curriculum are supported by the following activity:

Activity to build capacity	Provision
<p>Training and CPD opportunities to increase the participation of disabled CYP in all aspects of the curriculum</p> <p>Developing specific accredited and evidenced interventions/approaches, e.g. Nurture Groups, Therapeutic Story Writing, Instrumental Enrichment, Numicon &amp; Talkboost</p> <p>Developing whole school approaches to increase participation for CYP with complex learning needs, e.g. Total Communication approach</p> <p>Accredited courses for staff working with CYP with autistic spectrum disorders or language, learning or emotional needs: Autism Education Trust Tiers 1,2,3 for school age and early years staff</p> <p>Work with CYP, parents/carers and setting staff to increase the quality and consistency of the learning experience for disabled CYP, e.g. Early Years Sensory Group for parents/carers and Parent Information sessions for parents of children newly diagnosed with autism</p>	<p>Advice on teaching and learning strategies, classroom management and curriculum material is available from the local authority's Education Inclusion Specialist Support Service, and includes advice from the:</p> <p><u>Advisory Teaching Service</u></p> <p><u>Educational Psychology Service</u></p> <p><u>Early Years Service</u></p> <p>Further specialist sources of support can be accessed through:</p> <p><u>Glos Education Leaders for SEN and specific curriculum areas</u></p> <p><u>Gloucestershire Hospital Education Outpatient Service</u></p>
<p><b>Monitoring provision and progress of CYP with SEND</b> to ensure quality, effectiveness and value for money</p>	<p>Use of National Benchmarking data (e.g. through the National Sensory Impairment Partnership, Consortium for Research Into Deaf Education, British Association of Teacher's of the Deaf) to monitor participation and educational progress for specific cohorts of CYP need within Gloucestershire against national data.</p>

<p><b>Support for Head teachers, school/setting leaders, Governing Boards and SEN Governors</b> to develop SEND policy, practice and procedure and embed Early Help /Gloucestershire Graduated pathway for SEND</p>	<p>Annual SEND conferences</p> <p>GCC's Local Offer website details local, regional and some national training</p> <p>Education and Inclusion Team</p> <p>Governor Support</p> <p>Education, Performance and Intervention team</p> <p><u>Guidance Booklet for Practitioners Working with CYP with Additional Needs, including SEND</u></p>
<p><b>Support for SENCO's</b> to share best practice, network locally and increase the extent that disabled CYP take part in school curriculum and embed Early Help &amp; Gloucestershire's Graduated Pathway for SEND</p>	<p>Mature SENCO clusters for primary and secondary schools/colleges providing national and local updates and enabling a Gloucestershire platform to raise awareness of disability and specific training about SEND.</p> <p>Conferences for SENCOs to improve outcomes for CYP with SEND.</p>
<p><b>Support to develop disabled CYP participation in the wider curriculum</b> such as mainstream clubs, leisure, sporting and cultural activities as well as access to special school sports and physical activity facilities for disabled CYP who attend local mainstream schools.</p>	<p>Well established links with local organisations such as <u>Active Gloucestershire</u>, <u>GDance</u>, and <u>Gloucestershire Deaf Association</u></p> <p>Gloucestershire Active Inclusion Network increase disabled CYP participation in activities and new opportunities Current information and opportunities for CYP, their families and professionals is housed on the <u>Local Offer</u></p>
<p><b>Support to develop</b> better partnership working which will really make a difference to the outcomes for our vulnerable children and young people.</p> <p>Our plan identifies what organisations are going to do to deliver services to improve outcomes for the most vulnerable, and how they are going to do it.</p>	<p><u>Health and Social Care for Children, Young People &amp; Families</u></p> <p><u>Gloucestershire's Joint Strategy for Children and Young People with Additional Needs, Including Special Educational Needs &amp; Disabilities (SEND)</u></p>

## **5.2 Improving the physical environment of schools and settings**

5.2.1 To improve physical access we expect schools and setting to take reasonable steps to undertake work as required. This may include:

- changes to the physical environment of the settings to make it more accessible including steps, stairways, kerbs, exterior surfaces, parking areas, building entrances and exits, as well as sensory considerations including lighting and the acoustic environment;
- improvements to physical access including the provision of ramps, handrails, lifts, widened doorways, adapted toilets etc. and physical aids to education;
- changes to the physical environment to improve classroom acoustics and resulting in improved listening conditions for all CYP, for example, installing carpets or acoustic ceiling tiles or undertaking sensory audit to identify changes to the physical environment benefit CYP with sensory needs or processing difficulties;
- provision of physical aids to improve access such as adapted ICT equipment, for example, enlarged computer screens, specialist mouse controls or adapted keyboards or individual equipment including specialist chairs

5.2.2 There may be some areas within a school or setting which are legitimately defined as inaccessible, as it would not be reasonable to carry out adaptations to gain access to them. This could be because of the type of room it is, because it is replicated on the ground floor, or because the building is listed and adaptations would be very difficult or very costly. In these cases, and also in other situations where appropriate, reasonable adjustments made by schools could include steps such as re-timetabling lessons or activities. In some instances it has been necessary for a CYP at a primary school to remain in the same classroom for more than one year because other rooms could not be made accessible. In these cases the CYP's peers have also remained in that classroom. No CYP should be disadvantaged by such decisions.

5.2.3 All new buildings have to comply with the Building Regulations and the Education (School Premises) Regulations 1999 and should be physically accessible to disabled CYP. The Equality Act 2010 means that the British Building Standards Guidance has been changed to incorporate its requirements; guidance in BS8300 deals with new buildings; BS993 sets performance standards for reverberation in teaching and study spaces and defines good acoustic standards for schools and settings.

5.2.4 Schools and settings will need to bear in mind equality issues when they undertake to let their premises to ensure access is available for the disabled user. GCC general letting guidance will be updated to reflect the requirements of the Equality Act (2010).

5.2.5 GCC plays a vital role in making community, voluntary controlled and voluntary aided schools (both special schools and mainstream schools) and settings physically accessible to disabled CYP. We want:

- our disabled CYP to thrive and access their full educational entitlement;

- our disabled CYP and their family's needs to be met in their local communities and that our families and disabled CYP are well informed to help themselves;
- 100% all our schools to publish their Local Offer on the Family Information Service website

Activity	Provision
GCC audits every school regarding the provisions of the Disability Discrimination Act	All schools have had audit reports to support the DDA set National Standards and the reports deal with all disabilities including auditory impairment, visual impairment and physical disabilities
GCC seeks to plan ahead in an anticipatory way, through discussions with schools/settings and regular meetings with Health, Early Years Partners and SEND teams to obtain early indications of the needs of CYP moving into primary schools or transferring from primary to secondary schools	<p>Access meetings take place 3 times a year to identify disabled CYP starting schools, in transition between Key Stage 1 and 2, Key Stage 2 and 3, i.e. primary to secondary transition and Post 16</p> <p>Access needs of all disabled CYP with significant needs in mainstream settings are regularly reviewed through these meetings</p>
All disabled access works undertaken at schools, other than those undertaken under Building Regulations, or new school builds, have been based on the needs of individual CYP	<p>GCC will continue to focus on the needs of individual CYP to ensure the best use and prioritisation of the available funding.</p> <p>Funding is currently targeted towards the needs of CYP requiring adaptations.</p> <p>GCC plans to continue upgrading premises as and when required to suit individual need. This ensures that the needs of particular CYP are met and that the overall building stock is improved for disabled access in a sensible and effective way.</p> <p>Academies have responsibility for ensuring that they can meet a diverse range on needs and should apply principles of this accessibility strategy.</p>
GCC will inform schools and parents/carers of this Accessibility Strategy via Gloucestershire Local Offer, Information for Practitioners on the <a href="#">Glofamiliesdirectory</a> and a range of consultation/participation activity	Gloucestershire's schools Local Offer can be found on <a href="#">SEND Local Offer</a> detailing how an individual setting/school will respond to meeting the needs of CYP with SEND and includes information about the settings provision, policy and practice so that CYP and their

	parents/carers can make informed choices.
GCC will support schools as they formulate their plans to ensure that they are setting achievable goals and targets for making their premises more accessible. The accessibility report for each school will show what action can be taken towards implementing works either for a CYP who is to attend, or for a member of the general public who might wish to gain access, but who is prevented or restricted from doing so	<p>Schools must include accessibility issues in their asset management and access plans.</p> <p>Plans, goals and targets should be reviewed and reported on annually by governors to parents/carers.</p> <p>Accessibility issues including consideration of the acoustic environment as published in the guidance within <u>Building Bulletin 93</u> should be considered within any development schemes being undertaken.</p>

### 5.3 Improving the delivery of information to disabled CYP

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

5.3.1 GCC has effective specialist support services for individual CYP with SEND including hearing, visual impairment and physical disability who work to build school/setting capacity to meet individual needs in addition to individual work with some CYP (Education and Learning: SEND). Their role also includes supporting settings to make written material available in alternative formats for individual CYP in a timely manner.

There are three GCC specialist support service area bases (Gloucester and Forest, Cheltenham and Tewkesbury [including parts of North Cotswolds] and Stroud & Cotswolds) and each provides support, resource loans, adaption/modification of resources and materials, in addition to direct teaching. These focus on the primary area of specialist need and the most appropriate provision to meet those, as detailed below. A specialist resource base to produce modified and adapted resources and materials for CYP with Visual Impairment across Gloucestershire is housed in the Stroud & Cotswolds Base.

Need	Provision
Communication & interaction needs	<p>Support to deliver and produce accessible information and visual timetables, e.g. use of Communicate in Print, developing a Total Communication environment.</p> <p>Use of Alternative and Augmented</p>

	<p>communication methods.</p> <p>Parent programs support the delivery of this information.</p>
Cognition and learning needs	Support to deliver and produce differentiated learning resources and written information using symbols and photographs.
Sensory/physical needs	<p>Support to deliver and produce information including graphs in a range of media including Braille, enlarged print and Moon, as well as support to develop usage of scanners and technology to deliver information.</p> <p>Support for CYP to take notes in British Sign Language and using tactile methods.</p>
Emotional, social, mental health and behavioural needs	Support to provide visual information and schedules to enable consistency of information delivery approach.

There are effective quality assurance systems in place to monitor the quality of service delivery. These include self evaluation, feedback from training activities, targeted interviews with parents/carers and self review activities alongside systematic analysis of specific cases.

## **6. Access audit and review of accessibility in schools and settings**

- 6.1 All schools and settings should regularly review their accessibility plans, ensuring that these comply with the Local Authority's Accessibility Strategy.
- 6.2 Resources will be made available to implement this accessibility strategy using capital funding and other funding sources where available. Specific actions will be agreed when settings raise access issues in relation to their access plans and information on individual CYP has been obtained. These goals and targets will be measurable and appropriate review and evaluation procedures will be established; including an annual report to the Education Senior Leadership team.
- 6.3 The Council's commitment to Engagement and Participation means that every CYP with SEND and their family will be invited to tell us about how they found our services and feedback used to help us improve: Feedback Survey

## **7. Consultation**

This accessibility strategy will be kept under regular annual review by:

- SENCO Clusters
- Parent/Carer Forum
- GAPH/GASH/GASSH
- Student voice platforms
- Children with Additional Needs & Education SLT's
- Annual review scheduled by the Access Project Team



**Reviewed by and contributions:**

<b>Name</b>	<b>Role</b>
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Gareth Vine	Universal Commissioning Manager
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Advisory Teaching Service	Specialists in: <ul style="list-style-type: none"><li>• Communication Interaction</li><li>• Cognition and Learning</li><li>• Hearing Impairment</li><li>• Visual Impairment</li><li>• Multisensory impairment</li><li>• Physical Disability</li></ul>

**Previous versions:**

[Accessibility Strategy 2015-2018](#)