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# **Accessibility plans and the Equality Act 2010: a handbook for schools**

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# Introduction

The Equality Act 2010 (the Equality Act) is designed to address the disadvantage and discrimination experienced by particular groups of people and to provide a legal framework for addressing these inequalities. Schools have a range of responsibilities under the Equality Act; these include responsibilities to pupils, to employees and to other users of the school.

The focus in this guide is on disabled pupils and the school accessibility planning duties. These duties require a planned approach to increasing accessibility so that, over time, disabled pupils are more comprehensively included in the whole life of the school and fewer adjustments are needed for individual disabled pupils.

These duties sit alongside other duties that are directly relevant to assessing accessibility and identifying and removing barriers for disabled pupils:

- schools' duties not to discriminate against, *harass* or *victimise* disabled pupils and to anticipate and make *reasonable adjustments*<sup>1</sup>;
- schools' duties to pupils with special educational needs (SEN) under the Children and Families Act 2014 (CFA)<sup>2</sup>; and
- for publicly-funded schools, duties under the *Public Sector Equality Duty (PSED)*.

In 2019, research by the Alliance for Inclusive Education<sup>3</sup> (ALLFIE) found low levels of awareness of the accessibility planning duties:

**ALLFIE research** found that of the parents responding to online questions, only 21.3% had ever heard of accessibility plans. For most of them, the first time they had heard of accessibility plans was through ALLFIE's publicity for the research.

Awareness among professionals in schools and local authorities (LAs) was higher, 36.5%, but varied significantly with their role<sup>4</sup>.

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<sup>1</sup> We use italics to indicate that a term has a particular meaning in the Equality Act or CFA. Many of these terms are explained in this guide. For more detail and for the explanation of more terms, refer to the Council for Disabled Children (CDC) booklet, *Disabled Children and the Equality Act 2010: What teachers need to know and what schools need to do*. To note: we also use italics for direct quotes.

<sup>2</sup> To note: not all schools are subject to the SEN duties but for ease of use we don't spell that out each time.

<sup>3</sup> The Alliance for Inclusive Education is an organisation campaigning for the right of all disabled learners (including those labelled as having SEN) to be in mainstream education.

<sup>4</sup> Sooreanian, A (2019) *Accessibility Plans as Effective Tools for Inclusion in Schools: Are They Working? A Project Report for 'Disability Research on Independent Living and Learning (DRILL)'* ALLFIE

pdnet<sup>5</sup> wanted to explore these findings further, to gain insight into school practices in the writing and use of accessibility plans. In 2020:

**pdnet** found that: *Data collected indicated just 36% of plans link to the School Improvement Plan, only 40% of responding schools involve stakeholders, including parents, in the information collected process, only 21% consult with students and just 67% of Accessibility Plans are published on the school website<sup>6</sup>.*

The ALLFIE research used a range of methods. Findings from the 12 focus groups indicated that *no disabled young person was involved in the development of a plan in their school or consulted with during the process.*

**Both research teams** recognised the importance of accessibility planning in enabling more disabled children and young people to feel welcome in school, and they concluded that:

- *when used effectively, Accessibility Plans can be a driver for positive change (ALLFIE)*
- *a well-written and reviewed Accessibility Plan is a powerful tool to drive inclusion in schools (pdnet).*

There are significant benefits for schools in having an effective accessibility plan:

- a good plan can promote inclusion, increase the engagement in and enjoyment of school life for disabled pupils and improve the 'welcome' for all pupils;
- one-off adjustments can be incorporated into school policies in a planned way; and
- many developments arising from the plan can be piggy-backed on other developments and can help to distribute responsibilities across the school; and with an increasing focus on inclusion, a plan can enable schools to be both more welcoming and more responsive to disabled pupils in a planned way that doesn't stretch the resources of the school, either human or financial.

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<sup>5</sup> pdnet is a network for those supporting learners with physical disability.

<sup>6</sup> pdnet (2020) *Accessibility Planning: A Toolkit for Schools*

An effective accessibility plan can help to meet Ofsted expectations of:

- *a clear and ambitious vision for providing high-quality, inclusive education and training to all. This is realised through strong, shared values, policies and practice*<sup>7</sup>;
- *a curriculum that is ambitious and designed to give all learners, particularly the most disadvantaged and those with special educational needs and/or disabilities (SEND) or high needs, the knowledge and cultural capital they need to succeed in life*<sup>8</sup>;
- *[a curriculum that] remains as broad as possible for as long as possible, including when delivered remotely. The school does not offer disadvantaged pupils (including pupils with SEND) a reduced curriculum*<sup>9</sup>; and
- *strong take-up by pupils of the opportunities provided by the school. Disadvantaged pupils (including those with SEND), consistently benefit from this excellent work*<sup>10</sup>.

This guide is designed to support schools in:

- meeting the accessibility planning duties;
- developing their plan in a way that will lead to the best possible plan for their school; and
- adopting a whole school approach.

## **Embedding the duties: a whole school approach**

This guide summarises the accessibility planning duties to disabled pupils. The duties are designed to improve access to the life of the school for disabled pupils. An effective accessibility plan can make a difference and is an efficient way of removing barriers for disabled pupils. Despite finding low levels of awareness of the duties, the research teams we quoted, above, were confident that accessibility plans have an important contribution to make to a more inclusive future:

**ALLFIE** hoped their 2019 research would *re-energise current national debates around inclusive education and how to make the curriculum and physical environment more accessible within the English education and training system*.<sup>11</sup>

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<sup>7</sup> Ofsted (2024) *School Inspection Handbook*, Grade descriptors for leadership and management

<sup>8</sup> Ofsted (2024) *School Inspection Handbook*, Evaluating the quality of education, curriculum

<sup>9</sup> Ofsted (2024) *School Inspection Handbook*, Evaluating the quality of education, curriculum

<sup>10</sup> Ofsted (2024) *School Inspection Handbook*, Grade descriptors for personal development

<sup>11</sup> Soorenian, A (2019) *Accessibility Plans as Effective Tools for Inclusion in Schools: Are They Working? A Project Report for 'Disability Research on Independent Living and Learning (DRILL)' ALLFIE*

Those with overall responsibility for the school set its vision, ethos and strategic direction; they hold executive leaders to account for the performance of the school; they oversee the financial performance of the school and ensure the voices of school stakeholders are heard. They hold responsibility for the statutory duties under which schools operate, including the Equality Act duties<sup>12</sup>.

Schools are more likely to experience improvements for the whole school community where:

- the vision, ethos and strategic direction of the school focus on addressing inequalities and improving outcomes for all pupils;
- meeting the Equality Act duties is embedded in everyone's responsibilities, as part of a whole-school approach, rather than seen as a separate exercise; and
- the arrangements are kept under review as part of wider school improvement.

### **The SEN and disability code of practice**

*School leaders should regularly review how expertise and resources used to address SEN can be used to build the quality of whole-school provision as part of their approach to school improvement<sup>13</sup>.*

A whole school approach is one that embeds equality considerations in the culture and ethos of the school, in policies and in everyday decisions. Where schools adopt a whole school approach, they will find it easier to improve equality of opportunity:

*... so that all pupils can thrive together, understanding that difference is a positive, not a negative, and that individual characteristics make people unique (Ofsted)<sup>14</sup>.*

The impact of this should be that, over time, the culture and attitudes of the school community become more welcoming, outcomes for disabled pupils improve, and the school does not have to make so many individual adjustments for individual pupils because, in the widest sense, the school is more accessible for all pupils. In general, schools find that improving the school for disabled pupils has the effect of improving the school for everyone: other pupils, staff and parents<sup>15</sup> too.

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<sup>12</sup> We explain responsibility for the Equality Act duties in section 1.2, *Who has responsibility?*

<sup>13</sup> DfE and DH (2015) *Special educational needs and disability code of practice: 0 to 25 years*

<sup>14</sup> Ofsted (2024) *School Inspection Handbook*

<sup>15</sup> Throughout this Guide, when we refer to 'parents', we include parents, carers and those with parental responsibility.



## What's in this handbook? And who is it for?

This handbook sets out a process for developing a school accessibility plan. The same process can be used for reviewing and revising an accessibility plan during the three-year period to which the plan relates:



**This guide is for *responsible bodies*<sup>16</sup>, school leaders, teachers and all staff working in schools. It is designed to support the *responsible body* in:**

- meeting the accessibility planning duties;
- ensuring that everyone working in the school is aware of, understands and is working in a way that meets the duties; and
- securing the best possible plan for the school by working with staff, parents, pupils and services supporting the school.

## Using the handbook

The handbook can be used to steer the development of your school's accessibility plan from beginning to end, but there is no assumption that it will be used in this way. Those leading the work on accessibility planning may, for example:

- look for a way into the planning process, so look at section 3, *Taking stock*;
- be uncertain about what is meant by information for disabled pupils, so look in section 4.3, *Improving information for disabled pupils*;
- have already identified some priorities for their plan, so look at section 5, *Making it happen*;
- want to consider the review and revision of their accessibility plan, so go to section 5.4, *Reviewing and revising as necessary*; or
- want to use the checkpoints in Appendix 1 to check that their accessibility plan meets the statutory requirements.

If you are using the process from beginning to end you may find there is some repetition of key points, such as the importance of understanding the disabled pupil population of your school.

**Sections 1-5** outline a five-stage process, see navigation diagram, above, for developing your school accessibility plan or for reviewing and revising it during the three-year period that it covers. The stages are colour-coded to facilitate navigation.

**The appendices** provide some additional tools that may be useful to schools:

Appendix 1: A set of checkpoints that support *responsible bodies* in checking whether they are meeting the statutory requirements for an accessibility plan.

Appendix 2: A template for an accessibility plan. This is framed by the process we recommend for developing an accessibility plan tailored to your school.

Appendix 3: A template action plan to support you in turning your accessibility objectives into actions.

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<sup>16</sup> We explain the term *responsible body* in section 1.2, *Who has responsibility?*



Appendix 4: Excerpts from school accessibility plans: these are not complete plans; they are excerpts from five plans cited in Appendix 2 showing the linkage between the different sections.

Throughout the guide there are boxes with quotes from relevant documents, findings from research, examples, and 'checkpoints' that draw attention to key points.

### **A family of Equality Act guides**

This guide is one of a family of guides for schools on the Equality Act published by the Council for Disabled Children (CDC), the two others being:

- *Disabled Children and the Equality Act 2010: What teachers need to know and what schools need to do*<sup>17</sup>
- *The Equality Act 2010 and disabled pupils: a guide for governors and trustees*<sup>18</sup>.

There is also a guide for early years settings:

- *Disabled Children and the Equality Act 2010: What Early Years providers need to know and do*<sup>19</sup>

And two guides for FE colleges and 16-19 academies:

- *Disabled students and the Equality Act 2010: What colleges need to know and do*<sup>20</sup>
- *Equality Act 2010 and disabled students: A guide for FE governors and trustees*<sup>21</sup>

Neither this nor the companion guides should be used as a guide to any individual situation or as a substitute for legal advice.

### **Examples**

The examples in this guide are drawn from schools and have been used to illustrate how accessibility planning can improve access to the life of the school for disabled pupils.

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<sup>17</sup> CDC (updated 2025) *Disabled Children and the Equality Act 2010: What teachers need to know and what schools need to do*

<sup>18</sup> CDC (2025) *Equality Act 2010 and disabled pupils: a guide for governors and trustees*

<sup>19</sup> CDC (updated 2025) *Disabled Children and the Equality Act 2010: What Early Years providers need to know and do*

<sup>20</sup> CDC (2025) *Disabled students and the Equality Act 2010: What colleges need to know and do*

<sup>21</sup> CDC (2025) *Equality Act 2010 and disabled students: A guide for FE governors and trustees*

# 1. Accessibility planning

## 1.1. What are the accessibility planning duties?

The accessibility planning duties are set out in section 88 of and Schedule 10 to the Equality Act. The duties require schools to have an accessibility plan to improve access to education for disabled pupils over time.

An accessibility plan is a plan that, over time, increases access for disabled pupils. There are three key strands that must be addressed in an accessibility plan:

- increased access to the curriculum for disabled pupils;
- improvements to the physical environment of the school to increase access to education and associated services at the school; and
- improvements in the provision of information for disabled pupils where it is provided in writing for pupils who are not disabled.

The accessibility planning duties apply to disabled pupils at the school and to disabled children and young people who might be admitted to the school as a pupil. This means that schools need to think ahead: consider patterns of admission, whether and, if so, how these patterns are changing; and be alert to early information about pupils coming through the admissions or transition processes. This can help schools to plan ahead, be ready to welcome disabled pupils and reduce concerns that they may feel 'unable to meet need'.

The school's accessibility plan must be:

- a plan for a three-year period, running from 1 April of specific years, see below;
- in writing;
- implemented; and
- reviewed during the three-year period to which it relates and revised as necessary.

When they prepare an accessibility plan, *the responsible body*<sup>22</sup> must have regard to the need to allocate adequate resources for implementing the plan<sup>23</sup>.

The *governing body* of a maintained school or maintained nursery school, and the *proprietor*, that is, the academy trust, of an academy school must ensure that *information as to the plan* is set out in the school's *SEN Information Report*.

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<sup>22</sup> We explain the term *responsible body* in section 1.2, *Who has responsibility?*

<sup>23</sup> The Equality Act 2010 Schedule 10, paragraph 4(1)

The publication of an *SEN Information Report* is a requirement of the CFA<sup>24</sup> and Regulations made under it<sup>25</sup>. A school's *SEN Information Report* must include *information as to* a number of aspects of schools' duties to disabled pupils, including the school's accessibility plan.

Schools not covered by the duty to publish an *SEN Information Report* will nonetheless want to consider whether to publish information about their accessibility plan or the plan itself.

In practice, most schools publish information such as their accessibility plan on their school website, along with other plans and policies, though the pdnet research found that only 67% did so<sup>26</sup>.

In addition, accessibility plans are relevant to school inspection:

### **The Equality Act**

*A relevant inspection may extend to the performance by the responsible body of its functions in relation to the preparation, publication, review, revision and implementation of its accessibility plan<sup>27</sup>.*

The timescales for accessibility plans are quite specific and a new plan must be prepared every three years, counting from 2006, when the first 'new' plans were required<sup>28</sup>. A new plan needs to be prepared on 1 March 2027, 2030, and so on and runs for the three-year period starting on 1 April in the same years<sup>29</sup>.

### **Accessibility planning duties and other schools' duties in the Equality Act**

The accessibility planning duties sit alongside other schools' duties in the Equality Act<sup>30</sup>. These include:

- duties to disabled pupils not to discriminate, *harass* or *victimise*;

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<sup>24</sup> The CFA, section 69(3)

<sup>25</sup> The Special Educational Needs and Disability Regulations 2014 (SI 2014/1530)

<sup>26</sup> pdnet (2020) *Accessibility Planning: A Toolkit for Schools*

<sup>27</sup> The Equality Act 2010 Schedule 10 paragraph 3(7)

<sup>28</sup> The Disability Discrimination (Prescribed Times and Periods for Accessibility Strategies and Plans for Schools) (England) Regulations 2005 (SI 2005/3221)

<sup>29</sup> For new schools, plans run from a month after opening to the next three-year period that applies to existing schools. Thereafter, plans follow the same three-year cycle as other schools, see Regulations above.

<sup>30</sup> For more information on schools' disability duties in the Equality Act, see CDC (updated 2025) *Disabled Children and the Equality Act 2010: What teachers need to know and what schools need to do*.

- the duty to anticipate and make *reasonable adjustments* so that disabled pupils are not placed at a disadvantage compared with their peers;
- the *PSED*, which places a general duty on public bodies and also requires maintained schools, academies and pupil referral units (PRUs) to publish *equality information* and *objectives*; and
- duties to disabled employees, parents and others using the school.

In meeting accessibility planning duties, there may be efficiencies to be achieved by taking actions that take account of other duties at the same time.

The accessibility planning duties also sit alongside schools' duties under the CFA. We summarise some of these duties in section 1.3, *Accessibility planning and the Children and Families Act 2014*.

There are also related accessibility requirements<sup>31</sup>: accessibility standards in respect of websites and apps. These duties apply to public sector bodies<sup>32,33</sup>.

LAs also have responsibilities for increasing accessibility and must put in writing an *accessibility strategy* in relation to the schools for which they are the *responsible body*. This must address the same three key aspects of accessibility: the curriculum, the physical environment and information for disabled pupils. Where schools are able to consult the LA on their accessibility plan or co-ordinate their plan with the LA's strategy, there may be efficiencies to be gained.

## 1.2. Who has responsibility for the accessibility planning duties?

The accessibility planning duties apply to all schools whether they are constituted as: academies or maintained schools; nursery, primary, secondary or all-through schools; mainstream, special or non-maintained special schools; publicly-funded or independent schools; and they apply to PRUs and alternative

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<sup>31</sup> Public Sector Bodies (Websites and Mobile Applications) (No. 2) Accessibility Regulations 2018 (SI 2018/952)

<sup>32</sup> Gov.uk (2018) *Understanding accessibility requirements for public sector bodies*

<sup>33</sup> Publicly funded primary and secondary or nursery schools are partially exempt, but must publish an accessibility statement and need to review and update the statement regularly.

provision academies. The duties apply to early years provision and sixth form provision where the provision is made in a school.

**The *responsible body*:** it is the *responsible body* for the school that has responsibility for the accessibility planning duties in the Equality Act:

- For a school maintained by the local authority (LA) the *responsible body* is the governing body or the LA<sup>34</sup>. Responsibility for most school functions sits with the governing body but the LA also has functions in relation to some areas, such as some admissions functions. The *responsible body* is whichever of the governing body or the LA is responsible for the particular function.
- For an academy, the *responsible body* is the *proprietor*, which is the academy trust.
- For an independent school, the *responsible body* is the *proprietor*.
- For a PRU, the *responsible body* is the LA.

Because different bodies have the responsibility for different types of school, throughout the handbook, we refer to the *responsible body* for the Equality Act duties.

As an employer, the school is responsible for the actions of employees working for the school, and for others, *agents*, working on their behalf<sup>35</sup>. In respect of most *protected characteristics*, employees and *agents* are also individually liable for discrimination. However, for disability discrimination in schools this individual liability does not apply. Because the Equality Act duties affect day-to-day interactions with disabled pupils, schools need to be able to show that they have taken *all reasonable steps* to make sure that employees and *agents* understand the duties and act in the light of this understanding.

Staff interactions with individual pupils and staff experiences and observations make an important contribution to the development of the school's accessibility plan. It is important to think of all of the staff of your school because of the interactions between pupils and, for example, office staff, those serving meals or maintaining the building, as well as teachers and teaching support staff.

Ofsted consider how well those with responsibility for the governance of the school ensure that the school is fulfilling its statutory duties, including those under the Equality Act<sup>36</sup> and they may ask to see the school's accessibility plan during a school inspection<sup>37</sup>.

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<sup>34</sup> For a PRU, it is always the LA.

<sup>35</sup> This might include, for example, a sports coach working at a school but not employed by the school.

<sup>36</sup> Ofsted (2024) *School Inspection Handbook*

<sup>37</sup> Equality Act 2010 Schedule 10: paragraph 3(7) and (8)

Alongside these institutional responsibilities, teachers have individual professional responsibilities under the Teachers' Standards. They:

*...must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities<sup>38</sup>.*

The Standards explicitly include duties:

*to promote equal opportunities and to provide reasonable adjustments for those with disabilities, as provided for in the Equality Act 2010*

From the very first steps in their career, teachers are expected to be aware of the impact of high-quality teaching on pupils' life chances, to adapt their teaching in a responsive way without lowering their expectations and to ensure all pupils have the opportunity to experience meaningful success. Since 2025, the combined *Initial Teacher Training and Early Career Framework* (ITTECF) has applied to all teachers in England. There is a stronger focus on SEN and disability and significantly more content related to adaptive teaching.

**The ITTECF** *has been designed in the knowledge that high quality teaching is the most important way to improve outcomes for pupils – particularly those with SEND. The framework is designed to enable trainees and [Early Career Teachers] to take their first steps towards becoming expert teachers who can transform the lives [sic] all pupils<sup>39</sup>.*

There are differences in the governance arrangements for different schools, for example, between different state schools, between different independent schools and between schools in the state and independent sectors. To include all the different forms of governance, where we refer to the broader responsibilities of schools, or to duties under legislation other than the Equality Act, we refer to governing boards and to governors and trustees. For any of the duties we refer to, we make it clear where the duties apply differently to different types of school.

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<sup>38</sup> DfE (July 2011 (introduction updated June 2013, latest terminology update December 2021)) *Teachers' Standards: Guidance for school leaders, school staff and governing bodies*

<sup>39</sup> DfE (2024) *Initial Teacher Training and Early Career Framework*

## 1.3. Accessibility planning and the Children and Families Act 2014

The school accessibility planning duties sit alongside other schools' duties relevant to increasing access and inclusion and improving outcomes for disabled pupils. This section focuses on how accessibility planning duties sit alongside the duties of relevant schools to pupils with SEN under the CFA. It highlights some key duties relevant to disabled pupils and, in particular, duties that apply to disabled children and to children with SEN.

**The definition:** the definition of disability used in the SEN framework is that used in the Equality Act. Disabled children and young people are covered by the SEN framework<sup>40</sup> where their learning difficulty or disability calls for *special educational provision*, that is, something additional to or different from provision made generally for others of the same age in mainstream education settings.

### The SEN and disability code of practice

*Where a child or young person is covered by SEN and disability legislation, reasonable adjustments and access arrangements should be considered as part of SEN planning and review<sup>41</sup>.*

**Best endeavours duty:** mainstream maintained schools and academies, maintained nursery schools, alternative provision academies and PRUs must use their *best endeavours* to:

*secure that the special educational provision called for by the pupil's [...] special educational needs is made<sup>42</sup>*

### The SEN and disability code of practice

*High quality teaching that is differentiated and personalised will meet the individual needs of the majority of children and young people. Some*

<sup>40</sup> The SEN framework is set out in the CFA, associated regulations and the *Special educational needs and disability code of practice: 0 to 25 years* (DfE and DH, 2015)

<sup>41</sup> DfE and DH (2015) *Special educational needs and disability code of practice: 0 to 25 years*, paragraph xxii

<sup>42</sup> CFA section 66(2)



*children and young people need educational provision that is additional to or different from this. This is special educational provision under Section 21 of the Children and Families Act 2014. Schools and colleges must use their best endeavours to ensure that such provision is made for those who need it. Special educational provision is underpinned by high quality teaching and is compromised by anything less<sup>43</sup>.*

**Have regard to the SEN and disability code of practice:** maintained schools, academies, PRUs, non-maintained special schools and independent special schools approved under section 41 of the CFA are among the bodies that must have regard to the Code in exercising their SEN and disability functions under the CFA:

#### **The SEN and disability code of practice**

*This means that whenever they are taking decisions they must give consideration to what the Code says. They cannot ignore it. They must fulfil their statutory duties towards children and young people with SEN or disabilities in the light of the guidance set out in it. They must be able to demonstrate in their arrangements for children and young people with SEN or disabilities that they are fulfilling their statutory duty to have regard to the Code.*

**Engage in activities with children who do not have SEN:** state mainstream schools and maintained nursery schools must (with limited exceptions) make sure that children with SEN engage in the activities of the school together with children who do not have SEN.

**School SEN Information Reports:** the CFA requires maintained schools, academy schools and maintained nursery schools to publish information, their *SEN Information Report*, about the implementation of their SEN policies. The detail of the SEN requirements is specified in regulations<sup>44</sup>. The CFA also requires the *SEN Information Report* to include *information as to particular aspects of schools' duties to disabled pupils*<sup>45</sup>:

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<sup>43</sup> DfE and DH (2015) *Special educational needs and disability code of practice: 0 to 25 years*, paragraph 1.24

<sup>44</sup> The Special Educational Needs and Disability Regulations 2014 (SI 2014/1530)

<sup>45</sup> The CFA, section 69(3)(b)

- the arrangements for the admission of disabled pupils;
- the steps taken to prevent disabled pupils from being treated less favourably than other pupils;
- the facilities provided to assist access to the school by disabled pupils; and
- the school's accessibility plan.

This information must be published on the school's website.

### **The SEN and disability code of practice**

*Where school governors are publishing information about their arrangements for disabled children and young people, this should be brought together with the information required under the Children and Families Act 2014.*

**Pupils with medical conditions:** under the CFA, maintained schools (excluding maintained nursery schools), PRUs, academy schools and alternative provision academies also have responsibilities for pupils with medical conditions, many of whom may count as disabled under the Equality Act. Schools must make arrangements to support them and in doing so must have regard to statutory guidance<sup>46</sup>, see also section 1.4, *Who counts as disabled?*

**LA duties under Part 3 of the CFA:** in Part 3 of the CFA, there are general duties on LAs that apply to disabled children and young people as well as to those with SEN. The key principles, in section 19, apply to LAs' duties under Part 3 and include the importance of: taking account of the views, wishes and feelings of children, their parents and of young people; their full participation in decision-making; information and support to enable them to participate in decision-making; and of support to achieve the best possible educational and other outcomes.

LAs must identify disabled children and young people in their area as well as those who have or may have SEN; must commission services jointly with other agencies; must integrate services where this will promote well-being or improve quality of services; must publish an *SEN and disability local offer* of services; must provide information and advice; and must keep educational, training and social care provision under review.

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<sup>46</sup> The CFA, section 100

All of the duties above apply equally to disabled children, their parents, and to disabled young people as well as to those with SEN.

These duties apply to LAs but *local partners* are under a *duty to co-operate*:

**Local partners and the duty to co-operate:** maintained schools, academies, PRUs, non-maintained special schools and schools approved under section 41 of the CFA, all count as *local partners*<sup>47</sup>. As *local partners*, these schools should anticipate the need to co-operate with the LA in the fulfilment of LAs' duties under this Part of the CFA, including, for example, to identify children and young people who have or may have SEN and those who have a disability<sup>48</sup>; to *keep education and care provision under review*<sup>49</sup>; and to publish and keep under review an *SEN and disability local offer*<sup>50</sup>.

The same schools should therefore apply the section 19 principles to their responsibilities.

**SEN and disability information, advice and support services:** duties in the CFA require LAs to make information, advice and support available to disabled children, their parents and to disabled young people, as well as to those with SEN. The duty covers the provision of information, advice and support on health and social care provision, as well as education and training. LAs must draw these services to the attention of parents, children and young people, schools and colleges, and must provide contact details of support services, including details of the local impartial SEN and Disability Information, Advice and Support (SENDIAS) service. Schools will want to make sure that parents, children and young people know about these services and have access to the information, advice and support that they provide.

## 1.4. Who counts as disabled?

The Equality Act definition of disability is broad. Your accessibility plan needs to be based on a sound understanding of the definition and which children and young people may count as disabled. This will enable you to tailor your accessibility plan appropriately to the disabled pupils in your school, and to children and young people who may be coming to your school as pupils.

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<sup>47</sup> The CFA, section 28

<sup>48</sup> The CFA, section 22

<sup>49</sup> The CFA, section 27

<sup>50</sup> The CFA, section 30

**The definition** covers mental or physical impairments that have a *long-term* and *substantial* adverse effect on a person's ability to carry out normal day-to-day activities.

**A physical or mental impairment** includes learning difficulties, sensory impairments, mental health conditions, medical conditions and hidden impairments such as specific learning difficulties, autism, and speech, language and communication impairments.

**The effect of the impairment:** in considering whether someone is disabled, it is the effect of an impairment that has to be taken into account. If the impairment has a *substantial* and *long-term* effect on a person's ability to carry out normal day-to-day activities it may amount to a disability. The terms are defined as follows:

- *substantial* is defined as being more than minor or trivial; and
- *long-term* is defined as lasting, or being likely to last, a year or more.

The meaning of *substantial* in the Equality Act is slightly at odds with what it means in everyday use, where we tend to think of it as being quite big, for example, a substantial meal. It may be helpful to think of *substantial* in the Equality Act as being big enough to 'have substance', hence *more than minor or trivial*.

In combination, the terms *substantial* and *long-term* set a relatively low threshold and cover more children than many imagine. The Family Resources Survey carried out in 2022-2023 estimates that 11% of children may count as disabled<sup>51</sup>.

### **Checkpoint: young children**

A child *under the age of six* who has an impairment which does not have a *substantial* and *long-term* adverse effect on their ability to carry out normal day-to-day activities is included in the definition of disability where their impairment would have a *substantial* and *long-term* adverse effect on the ability of a child *over six* to carry out normal day-to-day activities<sup>52</sup>.

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<sup>51</sup> Department for Work and Pensions (2024) *Family Resources Survey: financial year 2022-2023*

<sup>52</sup> The Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)

Disabled children and young people are covered by the SEN framework<sup>53</sup> where their learning difficulty or disability calls for *special educational provision*, that is, something additional to or different from provision made generally for others of the same age in mainstream education settings. The definition of disability used in the SEN framework is that used in the Equality Act.

### **Checkpoint: disability and special educational needs**

Though the definitions of disability and SEN are covered by different legislation, in practice there is a significant overlap. Children and young people with more significant SEN, including those who have an education, health and care (EHC) plan under the CFA, are more likely to be covered by the Equality Act: not because they meet the definition of SEN or have a plan, but because they are more likely to have an impairment that has a *substantial* and *long-term* effect on their ability to carry out normal day-to-day activities.

Research published in 2008<sup>54</sup> found that, on the basis of parental judgments, 40% of pupils with SEN in primary schools, 46% of pupils with SEN in secondary schools and 76% of pupils in special schools met the definition of disability<sup>55</sup>.

The disability discrimination legislation in the Equality Act covers disabled children and young people whether or not they have SEN.

**To note:** the national data gathered from schools is based on SEN as schools do not submit, and are not asked for, disability data. Data from other sources, for example the Office for National Statistics (ONS)<sup>56</sup>, is often based on the definition of disability. You need to bear this in mind when you make comparisons with data from your own school.

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<sup>53</sup> The SEN framework is set out in the CFA, associated regulations and the *Special educational needs and disability code of practice: 0 to 25 years* (DfE and DH, 2015)

<sup>54</sup> Porter J and others (2008) *Disability Data Collection for Children's Services*. Research Report DCSF-RR062

<sup>55</sup> At the time of the research the definition of disability was that in the Disability Discrimination Act 1995; the definition in the Equality Act 2010 is substantially the same.

<sup>56</sup> For example, ONS work on the DWP Family Resources Survey, and their work on outcomes for disabled people, see references

### **Checkpoint: disability and medical conditions**

Children and young people who have a range of medical conditions, such as epilepsy, diabetes or more severe forms of asthma and eczema, are likely to be covered by the definition of disability but may not be identified as having SEN. Under the CFA, maintained schools (excluding maintained nursery schools), PRUs, academy schools and alternative provision academies also have responsibilities for pupils with medical conditions: they must make arrangements to support them and, in doing so, must have regard to statutory guidance. The guidance is designed to:

*ensure that all children with medical conditions, in terms of both physical and mental health, are properly supported in school so that they can play a full and active role in school life, remain healthy and achieve their academic potential<sup>57</sup>.*

**Inclusions and exclusions from the definition:** the Government Equalities Office (GEO) and the Women and Equalities Unit (WEU) updated guidance, in 2013<sup>58</sup>, on a range of issues to be taken into account when considering who may be covered by the definition of disability in the Equality Act. The guidance covers conditions that are specifically included:

### **Checkpoint: inclusion in the definition**

The Equality Act counts some conditions as a disability regardless of the 'substantial and long-term adverse effect' threshold:

- the Equality Act names cancer, multiple sclerosis and HIV as disabilities;
- it requires severe disfigurements to be treated as having an adverse effect on a person's ability to carry out normal day-to-day activities; and
- it includes progressive conditions, that is, conditions that get worse over time, before the effect is substantial.

Under regulations made under the Equality Act, people who are certified<sup>59</sup> as blind or partially sighted are also considered to be disabled<sup>60</sup>.

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<sup>57</sup> DfE (2015, updated 2017) *Supporting pupils at school with medical conditions: Statutory guidance for governing bodies of maintained schools and proprietors of academies in England*

<sup>58</sup> GEO and WEU (updated 2013) *Disability: Equality Act 2010 - Guidance on matters to be taken into account in determining questions relating to the definition of disability*

<sup>59</sup> A person who is 'certified' as blind, severely sight impaired, sight impaired or partially sighted by a consultant ophthalmologist can be 'registered' with their local social services team.

<sup>60</sup> The Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)

The GEO and WEU guidance also covers conditions that are specifically excluded<sup>61</sup>:

### **Checkpoint: tendency to physical abuse**

Regulations<sup>62</sup> exempt certain conditions from being considered as impairments. This includes a *tendency to physical abuse*. In August 2018, a decision by the Tribunal determined that, for children in education who have a recognised condition that is more likely to result in a *tendency to physical abuse*, the regulations do not remove a child from the definition of disability or from the protection that the Equality Act provides<sup>63</sup>.

This means that, in line with the requirements of the Equality Act, schools must make *reasonable adjustments* to prevent or manage challenges presented by pupils who have disabilities that make them more prone to physical abuse, just as they must for pupils with disabilities that manifest themselves in other ways. Schools must also be able to justify any sanction as *proportionate*.

For the purpose of avoiding discrimination, anticipating and making *reasonable adjustments*, and meeting wider responsibilities, schools need to know who their disabled pupils are.

### **Checkpoint: disabled or 'a mainstream child'?**

Some people have a relatively restricted view of what counts as a disability and may not be aware of the breadth of the definition. The risk for schools is that, in holding a narrow view of the definition, they may underestimate the number of pupils covered by the duties and may inadvertently discriminate against a disabled pupil.

In a claim of disability discrimination relating to Child P, a school recognised his SEN but did not think of him as disabled. The Tribunal determined that he met the definition and that he had been discriminated against:

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<sup>61</sup> The case law, from 2018, covered in the checkpoint on the 'tendency to physical abuse', post-dates this guidance.

<sup>62</sup> The Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)

<sup>63</sup> Upper Tribunal decision in the case of Child L



*However, it was clear that the teachers at the school had a different understanding of the threshold for disability, and did not regard Child P as disabled; in their view, that category indicated a greater degree of learning or other difficulty than Child P was affected by: as the class teacher put it, Child P was "a mainstream child"<sup>64</sup>.*

**Knowing who may count as being disabled:** there are different ways in which a school may become aware that a pupil may be disabled: they may receive information from a pupil's previous school; they may be told by the child's parents; it may be through careful observation of a child's progress and behaviour. Asking questions is an obvious way of finding out but, with no duty on either parents or pupils themselves to disclose a disability, schools need to ask questions in a way that both respects a pupil's dignity and privacy and encourages parents, or children and young people themselves, to share information. If parents think that information might be used against their child, for example to encourage them to go to a different school<sup>65</sup> rather than to support them to be included, they may be reluctant to share information.

**Conversations with parents:** it is important to recognise that parents may not think of their child as being disabled and may not be aware that, because of the nature and impact of their child's impairment, their child is covered by the definition in the Equality Act. Schools should therefore ask questions in the broadest possible terms and ask about any learning difficulty, disability or health condition. It may be a more productive conversation if the focus is on any adjustments that the school may need to make, rather than on the nature or existence of a disability.

**Reasonably expected to know:** if a claim of discrimination were made to the Tribunal, it would be no defence for the school to say that it did not know that a pupil was disabled, unless the school *could not reasonably have been expected to know* that they were disabled. If a parent shared information about an impairment or condition with any member of staff including, for example, a member of staff in the school office, the school would be deemed to know.

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<sup>64</sup> Tribunal decision in the case of Child P

<sup>65</sup> Office of the Children's Commissioner (2014) *'It might be better if you looked elsewhere': An investigation into the schools admission process*

A key point here is whether the school knows about a pupil's impairment or condition, not whether that impairment or condition amounts to a disability under the definition in the Equality Act. Ultimately, that issue is decided by the Tribunal in the event of a claim of discrimination. This further underlines the importance of schools understanding the breadth of the definition.

**Conditions may change over time:** schools should have discussions around the time of admission but, because individual impairments can change, should also take regular opportunities to check with parents and with children and young people themselves<sup>66</sup>. Equally, a condition may not change, but the environment, the expectations and demands on disabled children and young people may change and so *reasonable adjustments* may need to change to ensure disabled pupils are not at a disadvantage.

**Planning considerations:** beyond these individual considerations, schools need to know who their disabled pupils are for planning purposes, to tailor their accessibility plan appropriately and, for schools covered by the *PSED*, to inform the way they meet those duties. Where they are asked to, relevant schools must also co-operate with the LA in the LA's duty, under the CFA, to identify disabled pupils and those who have or may have SEN.

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<sup>66</sup> To note: for pupils on SEN Support, the *Special educational needs and disability code of practice: 0 to 25 years* advises, *Schools should meet parents at least three times each year*, paragraph 6.65.

## 2. Getting started

### 2.1 Getting the best plan for your school

Accessibility plans must meet the requirements of the Equality Act, see section 1, *Accessibility planning*, and need to be informed by a secure understanding of the breadth of the definition of disability, see section 1.4, *Who counts as disabled?* In addition, here, we recommend some principles that may help you:

**Start from where your school is now:** your plan needs to recognise the nature of the disabled population of your school, the nature of your school, and how your school currently engages with and plans access for disabled pupils. In section 3, *Taking stock*, we suggest three places to start assessing the accessibility of your school.

**ALLFIE** found that, *Almost all of the participants agreed that Accessibility Plans were ineffective in driving inclusive education unless the content of the plans was firmly embedded in school practice*<sup>67</sup>.

**There may be more disabled pupils than you think:** many people are surprised to find out how many people are covered by the definition of disability in the Equality Act. In developing your plan, take into account pupils already in your school who may be disabled, see section 1.4, *Who counts as disabled?* above, and information that you may have about those who may be coming to your school in the future.

**Your children and young people have important insights; use them!** There are both principled and practical arguments that tell us that the views of pupils are important in identifying policies and practices that can improve their access to the life of the school.

**A whole school approach:** nobody can do this on their own; these duties need a school wide response. It needs everyone to take the lead in respect of accessibility in their area of responsibility: access to the curriculum in the hands of those with curriculum responsibilities; access to breakfast clubs and after-school clubs in the hands of those leading before- and after-school activities;

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<sup>67</sup> Soorenian, A (2019) *Accessibility Plans as Effective Tools for Inclusion in Schools: Are They Working? A Project Report for 'Disability Research on Independent Living and Learning (DRILL)'* ALLFIE

ensuring that every area of the life of the school is covered by involving staff, pupils, parents and those working with the school in the process.

**Using specialist expertise:** schools are likely to find it helpful to involve specialist services and other agencies working with the school to identify ways in which simple actions can improve accessibility for disabled pupils:

**For example, advice may be available from:**

- a local autism outreach service who may be able to advise on playground layout, quiet study areas, or communication with autistic pupils;
- an occupational therapist: on suitable playground equipment designed to include pupils with a physical disability;
- a community nurse: on making appropriate provision for pupils to become independent in managing their medical conditions;
- an educational audiologist from the local hearing support service: on classroom acoustics for deaf pupils<sup>68</sup>;
- feeder schools: for early information about pupils who may come to your school;
- a Down syndrome support group: on outreach support or training opportunities for staff; and
- a habilitation specialist: on environmental adaptations to enable pupils with vision impairment to travel safely and independently around the school site.

***Your accessibility plan is not just about physical aspects of accessibility.*** Most people understand the physical aspects of accessibility such as ramps, doorways and marking steps clearly. Fewer are aware of the breadth of the requirements: they also cover access to the curriculum and information for disabled pupils. Even the requirements on the physical environment are broadly couched in the accessibility planning duty:

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<sup>68</sup> The British Association of Educational Audiologists may also be able to provide advice on, for example, classroom acoustics, listening environments and assistive listening technology.

**The Equality Act wording:** *A plan for [...] improving the physical environment of the school for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities or services provided or offered by the school<sup>69</sup>.*

Equally, it should not be assumed that it is only pupils with a physical or sensory impairment who encounter physical barriers. There may be physical barriers for a range of disabled pupils, for example:

- pupils with Down syndrome often have short stature and may need adapted equipment, footstools or steps and rails round toilets; and
- autistic pupils may experience high levels of anxiety where poor acoustics lead to noise levels being overwhelming, making the classroom inaccessible.

**Putting your plan into action and making sure it is working:** developing a simple action plan to address the objectives you have identified and incorporating this into your school development plan, where it will be monitored by the *responsible body*<sup>70</sup>, increases the likelihood that it will be implemented.

## 2.2. Getting the team together

To secure a whole school approach to the development or review and revision of your accessibility plan, it is helpful to recruit a team that is as representative as possible of the full school community. Whether as members of the team or working with the team, ideally, you involve those with a range of different perspectives and expertise. You may want to consider:

- representatives of teaching and non-teaching staff including learning support assistants or teaching assistants;
- those with responsibilities for different areas of school life: curricular, pastoral, recreational, organisational and administrative, and buildings maintenance and capital projects;
- disabled members of staff;
- parents, taking into account parents who do not regularly engage with the school;

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<sup>69</sup> The Equality Act 2010: Schedule 10 paragraph 3(2)(b)

<sup>70</sup> Reminder: the *responsible body* is the governing body, academy trust, or proprietor of the school, or, for a PRU, the LA, see section 1.2, *Who has responsibility?*

- pupils, taking into account ages, the nature of their disabilities, and how they prefer to communicate; and
- professionals from services and other agencies working with the school

Different stakeholders and representatives will want to be involved in different ways and need to be consulted on how they would like to contribute to the process: for example, parents of disabled pupils may want to meet as a group or may prefer to contribute their views through meetings planned as part of the review of an individual plan, that is, the annual review of an EHC plan, or the review of an SEN support plan/individual education plan; likewise with pupils themselves. This is discussed further in section 3.2, *Gathering views*.

It is helpful if there is a mechanism for individuals to contribute their views in writing, or in person to one of the team, or to a representative who is gathering views to feed into the team. Means of feeding views in should be publicised.

Within the team, people should be encouraged to lead on different aspects of accessibility, linked to their area of responsibility in the school.

Someone needs to lead the team, bringing together the findings and liaising with the *responsible body*. For the plan to be seen as whole school plan, it should be led by a senior member of staff, though this is not necessarily the SENCO. It is helpful to show how the views of different groups have influenced the plan. *Responsible bodies* can helpfully support the process by nominating someone to liaise with the team.

Whether you are developing a new plan or reviewing and revising an existing plan, it is important that everyone involved understands both the nature of the duties and the definition of disability in the Equality Act. To secure a shared understanding of these, we recommend sharing with the team:

- Section 1.1, *What are the accessibility planning duties?*
- Section 1.4, *Who counts as disabled?*

In this handbook we refer to the accessibility team, or the team, to refer to all those involved in developing or reviewing the accessibility plan for the school.

### 3. Taking stock

This section is designed to support you in:

- taking stock of the current accessibility of your school; and
- identifying barriers to access and inclusion for disabled pupils.

We suggest three starting points to inform your assessment of your school's accessibility, inform your plan and enable you to tailor it to your school.

#### Three starting points:

1. the vision, ethos and strategic direction for your school, set by the *responsible body*, see section 3.1;
2. views gathered to inform the development of your plan, see section 3.2; and
3. information and data to inform your plan, see section 3.3.

**More systematic audit?** You are likely to find that these three starting points provide you with an effective way of auditing your school's accessibility and identifying barriers in the three areas that need to be addressed in your plan: curriculum, physical environment and information for disabled pupils. You may find you need a more systematic audit of one or more of the areas of the plan, drawing on expertise beyond the school. Where a more systematic audit is needed this is picked up in relation to each of the three areas within section 4, *Identifying the main objectives*.

Each section outlines some of the issues schools may want to take into account and concludes with a few questions for you to consider.

### 3.1. Vision, ethos and strategic direction

For all schools, the vision, ethos and strategic direction are set by the governing board. The Department for Education (DfE) provides the following guidance for maintained schools and academies:

#### DfE governance guides

Maintained school governing body duties include: *ensuring that the vision, ethos and strategic direction of the school are clearly defined*<sup>71</sup>.

<sup>71</sup> DfE (2024) *Maintained schools governance guide*



For academy trusts: *The chair leads the board to set and champion a clear strategy for the trust, which aligns with the trust's charitable objects*<sup>72</sup>.

Your school's statement of its vision, ethos and strategic direction is a key element in framing your school's accessibility plan and its evaluation. Your school's statement may already make reference to inclusion, ambition for all pupils, a culture of co-production, and other values relevant to your accessibility plan, see below.

**For example:** School statements of vision, ethos and strategic direction often include elements that are highly relevant to the development of the school's accessibility plan; they often say something about:

- the school's ambitions for its disabled pupils;
- the school's focus on removing barriers in every area of the life of the school;
- a commitment to ensure all pupils access learning, make progress and achieve;
- staff skills in inspiring all children to make excellent progress, from their respective starting points;
- values that celebrate difference and promote an inclusive ethos;
- ensuring all pupils feel included and valued as members of the school community; and
- the school's wider commitment to equal opportunities.

Your school's articulation of its vision, ethos and strategic direction fulfils a number of key purposes:

**A statement of intent:** a mission statement or a statement of values, culture and ethos is a published expression of intent. However, it is the reality of the culture and ethos of the school as experienced by those within the school community that matters.

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<sup>72</sup> DfE (2024) *Academy trust governance guide*

**For example, ambition for disabled pupils**

Nationally, a number of reports, including Ofsted<sup>73</sup> and the House of Commons Education Committee<sup>74</sup> have identified a lack of ambition for children with SEN and disabilities.

**A report from the House of Lords Public Services Committee** shows that ambition can be compromised at a very young age:

*Young disabled people may be written off as not needing advice regarding work and careers due a mistaken perception that they will never be able to move into work. These perceptions can take root at a very young age. Laura Davis, told us of an occasion when she was in a nursery:*

*"They were having conversations with these little people, aged three or four, about what they want to be when they grow up. There was a boy in the room who said he wanted to be a bus (sic), and nobody questioned that, which is fine, but they skipped over the little girl with Down's syndrome. They did not ask her."*

*When Ms Davis asked the nursery staff why they had not asked this child, their response had been that they did not want to "raise their ambition"<sup>75</sup>.*

An important part of assessing accessibility is testing out whether published school purpose is consistent with personal experience. It is important to test this out through the views and the information and data that you gather, see sections 3.2, *Gathering views* and 3.3, *Information and data*.

**Communicating a view:** a mission statement or a statement of values can communicate the essence of the accessibility plan to those the school seeks to involve in its development as well as those outside the process but whom the school may want to consult.

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<sup>73</sup> Ofsted (2021) *SEND: old issues, new issues, next steps*

<sup>74</sup> House of Commons Education Committee (2019) *Special educational needs and disabilities*

<sup>75</sup> House of Lords Public Services Committee (2024) *Think Work First: The transition from education to work for young disabled people*

Internally, it can be an important part of seeking views and involving children, young people, their parents and school staff in the review and revision or the development of the plan. It supports and enables a discussion of the likely effectiveness of different ways of realising the intentions of the plan.

Beyond the school it communicates to those who work with the school and whom the school may want to consult on the plan.

**A direction for implementation:** it gives direction to the planning process, sets out the state to which the school aspires and frames the means of getting there.

**A framework for evaluation:** it also provides a framework for the evaluation of the plan. If the vision for the plan is to achieve good outcomes for disabled pupils, then an important part of the evaluation will be an examination of those outcomes. In effect it provides the framework for judging whether intentions are realised.

**A whole school view:** the statement expresses whole school intentions and therefore needs to be discussed with all staff. This discussion can, in itself, be an important and helpful part of the process of developing an accessibility plan.

The discussion:

- can help to involve all staff in the development of the plan;
- can help to create a sense of ownership of the plan;
- may be an opportunity to remind staff of the key duties towards disabled pupils under the Equality Act and underline the responsibility of every member of staff to remove barriers to learning for disabled pupils; and
- is rarely divorced from the practicalities and so often helps by engaging staff in the implementation of the plan.

**Quality:** where the statement sets high ambitions for its disabled pupils and is monitored and evaluated for its impact, it can provide a powerful framework for improvement.

**Efficiency:** an effective accessibility plan makes a difference and is an efficient way of removing barriers for disabled pupils. It can also reduce the extent to which schools need to make individual adjustments for individual pupils.

#### A few questions for the team

- Does the school's statement of its vision, ethos and strategic direction provide you with sufficient direction for your accessibility plan?
- If it does, what evidence is there from the other starting points for your plan, the views you gather, section 3.2, and the information and data you bring together, section 3.3, of the school's statement of intentions in practice?
- If it doesn't, does the school's statement need to be reviewed to provide direction for implementation, a framework for evaluation, and to fulfil the other purposes discussed above?

## Taking stock: 3.2. Gathering views

There are both principled and practical reasons for gathering the views of children and young people and their parents alongside those of school staff.

**Principles:** the SEN framework places a great emphasis on co-production.

#### The SEN and disability code of practice: co-production

This is a way of involving disabled children and young people and their parents: *in a way which ensures that children, young people and parents feel they have participated fully in the process and have a sense of co-ownership. This is often referred to as 'co-production'*<sup>76</sup>.

As a marker of high quality provision to meet the needs of children and young people with SEN, the SEN and disability code of practice<sup>77</sup> includes ensuring that *decisions are informed by the insights of parents and those of children and young people themselves*. Endorsing the principle of children's participation in decision-making, the Code cites the UN Convention on the Rights of the Child:

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<sup>76</sup> DfE and DH (2015) *Special educational needs and disability code of practice: 0 to 25 years*, paragraph 4.9

<sup>77</sup> DfE and DH (2015) *Special educational needs and disability code of practice: 0 to 25 years*

### **UN Convention on the Rights of the Child**

*Children have a right to receive and impart information, to express an opinion and to have that opinion taken into account in any matters affecting them from the early years. Their views should be given due weight according to their age, maturity and capability<sup>78</sup>.*

Ofsted also has a similar expectation:

**Ofsted** expects school leaders to: ... *actively seek and listen to the views and experiences of learners, staff and parents, taking prompt but proportionate action to address any concerns, where needed<sup>79</sup>.*

**Practicalities:** there are also considerations of effectiveness and efficiency that should encourage us to engage with children, young people and their families. A 2022 study by the Office for National Statistics (ONS) showed that disabled children, young people and their parents had good insights into what worked for them.

### **The Office for National Statistics**

*Young participants [in the research] reflected on their unique learning preferences and support needs, highlighting the importance of consulting with individuals to understand and find appropriate ways to accommodate their needs, without them feeling labelled as different.*

*Good communication and relationships between staff and pupils and their families were said to have a positive impact on young people's experiences at school; staff who displayed empathy, respect and care were described as encouraging young people to feel comfortable about asking for help, as well as being better able to understand their individual needs and adapt lessons appropriately<sup>80</sup>.*

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<sup>78</sup> Articles 12 and 13 of the United Nations Convention on the Rights of the Child

<sup>79</sup> Ofsted (2024) *School Inspection Handbook*

<sup>80</sup> ONS (2022) *Educational experiences of young people with special educational needs and disabilities in England: February to May 2022*

The Equality and Human Rights Commission (EHRC) highlights the importance of drawing on the insights of children and young people. It cites a school that, without consulting a deaf pupil, installs an induction loop in all teaching rooms – *but the pupil does not use a hearing aid and so is unable to benefit from the induction loop. The pupil reads lips and so a reasonable adjustment would have been to tell all staff to ensure that they face the pupil when speaking to him*<sup>81</sup>.

However, the 2019 research for ALLFIE found that, whilst some professionals suggested there had been co-production, it was *conceded that the quality and extent of co-production varied greatly depending on the culture of the school*; the field studies for the research, albeit a small sample, found that *no disabled young person or parent participant spoke of being involved in the development or review of accessibility plans*<sup>82</sup>.

We have pointed to the importance of the participation of children, young people and their parents in the review or development of your school's accessibility plan, but it is just as important that teachers, other staff and those working with the school are involved. They are the people who will have to put the plan into action, so they are crucial to its development and review. Again, the ALLFIE research found that even quite senior staff were not necessarily aware of accessibility planning duties:

**ALLFIE** found: *The professionals taking part in the field study were generally more aware of the existence of Accessibility Plans, but their knowledge varied widely depending on their role. An Access Officer [was well aware as accessibility plans were quite a large part of her role]. By contrast, another professional [...] made the following comment:*

*When I first looked at what this project was about and I read "Accessibility Plans," I thought, "Oh my goodness, I'm on a senior leadership team and I don't think I know what this means ..."*

Are all school staff aware of the school's duties to disabled pupils?

Staff views may be about how well disabled pupils are included in learning in classrooms, in different subjects and topics at different ages, or may include

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<sup>81</sup> EHRC (2014, updated September 2023, amended July 2024) *Technical guidance for schools in England*, paragraph 6.36

<sup>82</sup> Soorenian, A (2019) *Accessibility Plans as Effective Tools for Inclusion in Schools: Are They Working? A Project Report for 'Disability Research on Independent Living and Learning (DRILL)'* ALLFIE

observations about engagement in learning, as part of activities beyond the classroom or beyond the school day.

**For example:** In a school play, is a disabled child with a learning difficulty regularly given the same task, playing a drum, or are they supported to extend their skills and learn to play a role in the presentation?

It may be helpful to use questions about disabled pupils in respect of how they are represented in different areas of school life:

- *Presence:* are disabled pupils present in this area of school life?
- *Participation:* if they are there, are they engaged in the activity?
- *Progress and achievement:* if they are there and engaging in the activity, are they making progress and achieving?

Core issues, such as teacher confidence in teaching the full range of pupils in the school, including disabled pupils and those with SEN, are important for the purposes of identifying objectives for your accessibility plan.

**The 2018 TALIS<sup>83</sup> report for England** reported that just under 40% of primary and lower secondary school teachers felt they had a moderate or high need for additional continuing professional development in teaching pupils with SEN – one of the highest priority needs identified<sup>84</sup>.

Staff observations should be combined with information and data gathered, see next section, to inform the overall picture.

Staff encounter pupils in different ways and at different times of the day, for example, parents of pupils, and pupils themselves, may share information with office staff that may helpfully inform both operational and more strategic considerations, so it's important that all staff have the opportunity to contribute their insights into how well disabled pupils are involved in the life of the school. It may be relevant to consider whether there are *reasonable adjustments* that are being made individually, but for a number of pupils. In such circumstances,

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<sup>83</sup> Teaching and Learning International Survey

<sup>84</sup> TALIS (2018) *Teachers in Primary and Secondary Schools*



it may be more efficient to make changes to policies and practices rather than making repeated individual adjustments.

**For example:** A school was making a number of individual *reasonable adjustments* to school uniform requirements to accommodate individual disabled pupils. The school consulted on bringing in some additional choices for all pupils. The school then planned the introduction of these. This removed the need for multiple individual adjustments; removed uniform 'friction'; and improved teacher-pupil relationships.

**To note:** Making changes to policies and practices for all pupils can reduce the number of *reasonable adjustments* that must be made and may have wider benefits such as those at the school in the above example. This does not remove the requirement to anticipate and make *reasonable adjustments* for disabled pupils.

Gathering views does not have to be burdensome. It can often be:

- piggy-backed on other surveys, for example, surveys of the views of parents and pupils, sometimes with the addition of a question or two;
- added in to parent conversations about pupil progress, and, where a disabled pupil has an SEN Support plan/individual education plan or an EHC plan, into the regular review of that plan<sup>85</sup>; or
- where *reasonable adjustments* are being made for them, added in to the review of the effectiveness of those adjustments.

Gathering of views needs to be organised in a way that is accessible to the groups who are being consulted. Thought needs to be given to how disabled pupils may want to contribute their views. Could a few disabled pupils be trained to gather the views of other disabled pupils, as they were for a VIPER<sup>86</sup> research project? The children and young people working with this project said of their involvement:

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<sup>85</sup> Reminder: for pupils on SEN Support, the *Special educational needs and disability code of practice: 0 to 25 years* advises, *Schools should meet parents at least three times each year*, paragraph 6.65.

<sup>86</sup> Voice. Inclusion. Participation. Empowerment. Research. (VIPER)

**VIPER**

*We have worked with staff researchers in all parts of the research from deciding what questions to ask, to looking at the collected data. The research wouldn't have been the same without us. We asked questions in interviews that the staff researchers hadn't thought of and made sure those we interviewed answered our questions thoroughly<sup>87</sup>.*

**A few questions for the team**

- Do we already have information from pupils, parents and staff on the accessibility of different aspects of school life for disabled pupils?
- Do we need to gather further information on the views of pupils and parents? If so, how will we use planned opportunities to gather views?
- What information do we have already on the views of staff in different roles across the school?
- Do we have the views of staff on their confidence in providing the best learning experiences for disabled pupils?
- Can we gather, or do we have already, the views of external experts working with our school?
- What do those views tell us about how we can improve access to the life of the school for disabled pupils?

### 3.3. Information and data

Schools routinely collect information and data for a wide range of purposes and across a wide range of areas of school life. This may range from pupil numbers, attendance, progress and attainment, suspensions, exclusions, through to safeguarding, wellbeing and financial management. Much of this data is routinely analysed by pupil characteristics.

Information and data may be used to inform the governing board about the performance of the school; it may be used to inform Ofsted in school inspection; there is data that is submitted to the DfE. As far as possible, for the purpose of informing your accessibility plan, you should draw on existing information and data, rather than gathering more and new data. However, some of the data you

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<sup>87</sup> VIPER (2012) *The VIPER project: What we found*

already have may require a different analysis to show how disabled pupils are participating and performing in different aspects of school life. Such information and data, across all *protected characteristics*, is needed for other purposes too, for example, for the equality analysis required by the *PSED* for schools subject to the duty. In the context of the *PSED*, the EHRC provides the following advice:

#### **EHRC**

*The PSED does not require schools to routinely collect more information than they do already. In most instances, schools will already have sufficient information, either in the data that they routinely collect, through individual profiling or in the records that classroom teachers keep.*

*Where there are gaps, schools may decide to fill them by getting the views of parents and pupils with particular protected characteristics. The school leader should decide if the school has enough information about pupils with different protected characteristics to enable it to meet the PSED<sup>88</sup>.*

You may already have information from the gathering of views, see section 3.2, above, that fills gaps in the information and data that may be useful in informing the objectives for your school's accessibility plan. The views you have gathered from pupils, their families, staff and others working with your school need to be brought together with the strategic direction for your accessibility plan. This may highlight issues that may warrant further consideration, for example, if the school's values emphasised *staff skill and confidence in inspiring all children to make excellent progress irrespective of their starting points*, but the staff views showed low levels of confidence, this might suggest a professional development objective for your accessibility plan.

The purpose of this section is to highlight national patterns and evidence from research that form a backdrop for your school. This may help you to consider how well your own school is meeting the duties in the Equality Act and may highlight areas of risk that may warrant more detailed consideration in your school. This section is organised against three key questions:

- *Who are your disabled pupils?*
- *How well are disabled pupils participating in the life of your school?*
- *How well are disabled pupils achieving?*

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<sup>88</sup> EHRC (2022) *Public Sector Equality Duty: Guidance for Schools*

## Who are your disabled pupils?

This section needs to reflect a proper understanding of which pupils may be included in the Equality Act definition of disability, see section 1.4, *Who counts as disabled?* We provide a few prompts here to remind you of some of these considerations:

- the definition is broader than many people think, so includes more children and young people than many think;
- medical conditions may amount to a disability;
- observations of progress and behaviour may give a clue about the possibility of an underlying *impairment* that may amount to a disability;
- distracting and disruptive behaviour can be a signal to consider whether a pupil has a disability for which adjustments have not been made, or adjustments have been made but they are not working;
- parents and children and young people themselves may not know that they are covered by the definition of disability; and
- parents, pupils, staff and others may recognise that pupils have SEN but may not think of them as being disabled.

In all of these circumstances, conversations with parents, and with children and young people themselves, need to be handled sensitively, see section 1.4, *Who counts as disabled?*

National and local data provide us with a backdrop, against which you can view your own school. Some starting points here may be to consider whether the population of your school reflects the national and local profile, for example the estimate that suggests that, nationally, 11% of children may count as disabled<sup>89</sup>.

How are recent trends in the profile of children and young people's needs, both national and local, reflected in your school? Good liaison with your LA, including the local attendance support team and local specialist support services, can help in understanding recent trends and planning physical developments to the school environment, curriculum development or professional development for staff in relevant areas of need:

**For example:** Recent increases in numbers of children with autism, speech, language and communication needs and social, emotional and mental

<sup>89</sup> See, for example, Department for Work and Pensions (2024) *Family Resources Survey: financial year 2022-2023*

health difficulties (SEMH), many of whom are likely to count as disabled, can usefully inform developments to both the physical environment of your school and professional development objectives that you may want to build into your accessibility plan.

The accessibility planning duties apply to disabled pupils at the school and to disabled children and young people who might be admitted to the school as a pupil. This means that schools need to think ahead: consider patterns of admission, whether and, if so, how they are changing; and be alert to early information that may be available through the admissions or transition processes.

Research has identified factors that may affect school intakes:

**Research by the Office of the Children's Commissioner** found that, for example, on a preliminary visit to a school, parents of disabled children may be encouraged to visit a different school, which parents are encouraged to believe may have better SEN and disability provision for their child<sup>90</sup>.

Good links with feeder schools, or early years provision, and transition arrangements that are more detailed in respect of children with SEN and disabilities are helpful in providing advance information about children who may be coming to your school. In particular, good engagement with the LA over children for whom an EHC plan is being drawn up and who may want to come to the school enables the school to get provision in place in readiness. This is useful information in terms of being able to plan ahead and prepare to welcome disabled pupils.

Thinking ahead also involves considering the profile of disabled children who are already in the school and moving through it, including those at an earlier key stage who, for example, may need to access different facilities, use different equipment or need higher levels of independence in order to participate in different activities, as they move into the next school year or next key stage.

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<sup>90</sup> Office of the Children's Commissioner (2014) *'It might be better if you looked elsewhere': An investigation into the schools admission process*

## How well are disabled pupils participating in the life of your school?

**Ofsted** has identified *children with SEND being excluded, absent or missing from school much more frequently than other pupils nationally, and unofficial exclusions being used*<sup>91</sup>.

In the light of this national pattern, *participation in the life of the school* needs to start with a consideration of the attendance of disabled pupils, bearing in mind the range of different pupils, with different impairments included in the definition. What does the data tell you about the attendance of disabled pupils? *Reasonable adjustments* are often an important element in improving attendance; are there any more systematic changes that could be made to improve attendance?

**For example:** A secondary school found that some pupils with mental health needs, returning to school after a period of absence, found it difficult to maintain attendance because of anxiety about gaps in their learning that showed up on their return. They also found themselves left out of school trips because of their absence. The school:

- planned a series of young person friendly 'catch-up' sessions in different subjects to address gaps; and
- removed 'blanket' attendance requirements for joining school trips.

Research can also pinpoint areas of school life where disabled pupils may be less well represented; there may be patterns of participation that you can use to inform the objectives you set for your accessibility plan:

**For example:** Disabled pupils are more likely to miss out on particular areas of school life such as school trips, after-school clubs<sup>92</sup> and being invited or elected to positions of responsibility, such as becoming a representative on a school council.

<sup>91</sup> Ofsted (2021) *SEND: old issues, new issues, next steps*

<sup>92</sup> Robinson, D (2024) *Access to extra-curricular provision and association with outcomes*. Education Policy Institute

**For example:** In PE and extra-curricular sport, almost a third (29%) of disabled children are participating in less than 30 minutes of physical activity each day<sup>93</sup>.

How well are disabled pupils represented in the different areas of the taught curriculum of the school? Are they under-represented in some areas of the curriculum and over-represented in others? There is evidence that suggests that *disadvantaged pupils (including those with SEND)*<sup>94</sup> may have a narrowed curriculum offer.

### Ofsted

*In key stages 2 and 3, schools need to provide a broad, rich curriculum. Our research<sup>95</sup> into the curriculum shows that these stages are particularly susceptible to a narrow curriculum, and that this has a disproportionately negative effect on disadvantaged pupils (including those with SEND).*

There is evidence that in the core activities of teaching and learning in classrooms, pupils with 'high-level SEND'<sup>96</sup> may have a different experience from their typically developing peers:

### Research findings

Using systematic observation in classrooms, both primary and secondary schools, research indicates that pupils with 'high-level SEND' experience a different 'pedagogical diet' from their typically developing peers. They spend a disproportionate amount of time with staff who are not qualified teachers, and this is seen as contributing to poorer progress<sup>97</sup>.

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<sup>93</sup> Blake, M and Bhaumik, C (2023) *Active Lives of Children and Young People Survey 2022-23* Ipsos for Sport England

<sup>94</sup> Ofsted (updated September 2024) *School Inspection Handbook*

<sup>95</sup> Ofsted (2017) *HMCI's commentary: recent primary and secondary curriculum research*

<sup>96</sup> In this research, 'high-level SEND' is used to refer to pupils with what was, at the time of the research, a statement, now an EHC plan, see next footnote.

<sup>97</sup> Webster, R (2022) *The Inclusion Illusion: how children with special educational needs experience mainstream schools*

There may be particular areas of the curriculum that require review in the light of wider evidence that disabled pupils and those with SEN *are not receiving the support they need*, for example, in careers education, information and guidance (CEIAG) in secondary schools:

**Education Select Committee findings**

*Pupils with special educational needs and disabilities (SEND) face additional barriers to entering the workplace and are particularly in need of tailored careers advice and guidance to support them to achieve their goals. However, too often they are not receiving the support they need<sup>98</sup>.*

Are there physical barriers preventing the participation of disabled pupils in some aspects of the life of the school? This may be about identifying barriers that prevent or reduce access, such as:

- physical barriers for pupils with a physical disability, for example, workbenches for practical activities that are too high, or workbenches arranged around the edge of the room so that a pupil who lip reads has difficulty seeing the teacher's face;
- unadapted, or poorly adapted, toilet facilities;
- signage that is inaccessible to pupils with vision impairment and makes it more difficult for them to move around the school independently;
- a noisy and busy playground that makes it difficult for autistic pupils and pupils with high levels of anxiety associated with their impairment, to enjoy the recreational times of the school day; and
- poor acoustic environments affecting access for deaf pupils and other *children with special hearing or communication needs<sup>99</sup>.*

**DfE Building Bulletin 93 (BB93)** uses the term *special hearing or communication needs* to include, for example, children with speech, language and communication difficulties, vision impairment, ADHD or autism whose access may be affected by poor acoustics. The focus in BB93 is on providing *acoustic conditions that enable effective teaching and learning*.

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<sup>98</sup> House of Commons Education Committee (2024) *Careers Education, Information, Advice and Guidance*

<sup>99</sup> DfE Building Bulletin 93



Depending on the nature of the disabled pupil population of your school, any of these barriers may indicate the need for improvements in the physical environment. If there are no clear objectives emerging from the views and the information you have gathered, you may wish to consider undertaking an audit of the physical environment of your school.

pdnet have developed tools and materials to support schools in reviewing the physical environment<sup>100</sup>. The pdnet materials are designed to increase access for pupils with a physical disability, taking a broad approach to accessibility across the curriculum, the physical environment and the provision of information.

Thinking ahead to pupils who may be coming to your school is an important part of a planned approach and may be able to provide benefits of piggy-backing accessibility developments on other planned developments.

You may want to consider other barriers such as cultural or attitudinal barriers, for example:

- how well disabled pupils are represented in a wide range of school events, such as celebrations of pupil achievements in assemblies, awards and prize-giving, displays in school corridors;
- whether the range of achievements celebrated is across all areas of learning and development;
- how ambitious your school is for disabled pupils; and
- whether difference is accepted and celebrated or whether it becomes a focus for social exclusion or bullying.

Some schools gather data on bullying of pupils with certain *protected characteristics*; there may be incidents that provide insights into other issues; but it's unlikely that a school has data on all such issues. However, just asking the question may trigger sufficient responses to form working assumptions for the team.

### **How well are disabled pupils achieving?**

National data tells us that outcomes for disabled children and young people are poor:

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<sup>100</sup> pdnet (2020) *Accessibility Planning: A Toolkit for Schools*

### National data

Outcomes<sup>101</sup>: disabled young people are:

- more likely to have GCSEs as their highest form of qualification;
- more likely to have no qualifications at all; and
- in adulthood, likely to have poorer educational outcomes linked to poorer life outcomes, including, for example, lower likelihood of being in employment, lower levels of satisfaction with life, higher likelihood of social isolation.

Participation of 16- and 17-year-olds<sup>102</sup>: young people with an EHC plan are less likely to be in education or training than those with no identified SEN.

Destinations<sup>103</sup>:

- After Key Stage 4: pupils with SEN are less likely to have any sustained destination.
- After Key Stage 5: students with a self-declared learning difficulty, disability or health problem are less likely to progress to a sustained education, employment or apprenticeship destination.

We also know that, for children and young people with SEN, progress from the same starting point is lower than for those who do not have SEN:

### Research findings

Progress from the same starting points:

- between the ages of 5 and 7 and again between the ages of 7 and 11, children with SEN fall behind their peers with the same starting points<sup>104</sup>; and
- at Key Stage 4, the progress of pupils with SEN has been consistently lower than that of pupils without SEN and with the same starting points<sup>105</sup>.

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<sup>101</sup> ONS (2021) *Outcomes for disabled people in the UK: 2021*

<sup>102</sup> DfE (2024) *Special educational needs and disability: an analysis and summary of data sources*

<sup>103</sup> DfE (2024) *Special educational needs and disability: an analysis and summary of data sources*

<sup>104</sup> Parsons S and Platt L (2017) *The early academic progress of children with special educational needs*. British Educational Research Journal. 43, 3

<sup>105</sup> National Audit Office (2019) *Support for pupils with special educational needs and disabilities in England*

**To note:** The national data gathered from schools are based on SEN as schools do not submit, and are not asked for, disability data. Other sources including, for example, most data from the ONS, use the definition of disability. You need to bear these data differences in mind when you make comparisons with data from your own school<sup>106</sup>.

The national information and research, above, form a backdrop against which you can consider the same issues in the life of your own school. It is the interaction between the disabled pupil population of your school and those who might come to your school, and your school's curriculum, policies and practices and the physical environment, that needs to be the focus on information gathering for the preparation of your accessibility plan.

### A few questions for the team

- What does our information tell us about the profile of disabled pupils in our school? Does it reflect the local and national profile?
- What does our information tell us about disabled pupils and attendance?
- What does our information tell us about how well disabled pupils are participating in different areas of the life of the school?
- What does our information and data tell us about how well disabled pupils are achieving?
- From the information and data we have, do we have pointers for where and how we can improve access to the curriculum, make improvements to the physical environment and to information for disabled pupils?
- Do we have sufficient information to inform our objectives for our accessibility plan? Or do we need to gather further information in any areas?

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<sup>106</sup> We refer to research highlighting SEN and disability overlap data in section 1.4, *Who counts as disabled?*

## 4. Identifying the main objectives

It's important to think broadly about increasing access across the different strands in accessibility planning: the curriculum, the physical environment and the provision of information for disabled pupils. It is wise not to make assumptions that pupils with a physical disability will only need changes to the physical environment to improve access, or, for example that pupils with a learning difficulty or cognitive impairment only need changes to the curriculum to improve access.

To identify the objectives for your plan, it's helpful to bring together what you can glean from the three starting points that we suggest in the previous sections:

- the vision and values that frame your accessibility plan;
- the views you have gathered from pupils, parents, school staff and others; and
- the information and data that you have gathered or reviewed and analysed afresh.

None of these starting points stands on its own; they all need to be considered together along with the interactions between them. Gaps between the vision and values and the messages from the views you have gathered may highlight some priorities for your plan. Information and data may need to be supplemented by stories that sit behind the data.

The starting points may have already identified some clear priorities for your accessibility plan. The more comprehensive the gathering of views and information, the more likely it is that development objectives will have emerged from the starting points for your plan.

Where you have already identified objectives, you can move directly to putting your objectives into the curriculum, physical environment and pupil information sections of your plan, using your existing framework or using the template in Appendix 2.

## 4.1 Increasing access: participation in the curriculum

**The Equality Act wording:** *A plan for [...] increasing the extent to which disabled pupils can participate in the school's curriculum*

### **If you have already identified curriculum priorities for your plan...**

You may have identified priorities relating to the participation of disabled pupils in your school's curriculum through the starting points for your plan: the vision and values that frame your plan; the views you gathered from pupils, parents, teachers and others; and the information and data that you have gathered.

If you have already identified priorities, turn these into objectives and add them to your proposed improvements to the curriculum section of your plan, using your existing framework or using the template in Appendix 2.

You need to consider participation in the curriculum in the light of your understanding of the disabled pupil population of your school now but also, looking ahead:

- the preparation of current pupils for the next phase of their education; and
- the population of children and young people who may be coming to your school as pupils in the future, including, for example, those coming from local feeder schools or settings.

Increasing access to the taught curriculum for disabled pupils might involve addressing any restrictions in the range of subjects that disabled pupils can access or choose; providing accessible curriculum resources to enable independent learning; or developing a wider range of practical activities to make content more accessible. Such approaches may, in turn, require curriculum development or professional development or both.

Planned curriculum development work is time intensive, so, to be sustainable, it may be helpful to:

- start by incorporating individual *reasonable adjustments* into future planning;
- build accessibility considerations into all new curriculum development work;
- develop a planned approach to increasing access to different areas of the curriculum over the life of the school's accessibility plan;
- be co-ordinated with the objectives in the school improvement plan;

- be led by those with the relevant curriculum expertise within the school;
- carry out curriculum development in collaboration with partner schools, in local cluster or network arrangements; with other academies within the same trust; with subject specialist organisations or with academic or research bodies. This can benefit all parties, generate creative approaches and, over time, provide a wider base for assessing impact; and
- draw on the expertise of external partners, for example: autism outreach services, speech and language specialists, qualified teachers from local services for deaf pupils and pupils with vision impairment, educational psychologists or, for secondary schools, a local Careers Hub.

The implementation of curriculum developments may, in turn, require professional development for teachers:

**For example:** Where the PE curriculum is developed to provide a wider range of activities and sports to include disabled pupils, professional development will need to go hand-in-hand with curriculum development.

Development work may raise challenges for a range of existing policies and teaching and learning practices. This in turn may generate issues for wider school review, for example:

- the responsibilities of subject leaders;
- how well *reasonable adjustments* are working;
- how to frame ambitious expectations from a range of starting points;
- the use of peer support;
- time-tabling;
- the way that learning support assistants or teaching assistants are deployed;
- how the school plans to develop awareness of disability through the curriculum;
- how staff development needs are met so that all staff are confident in working with disabled pupils;
- how successful developments in one area of school life are shared across the whole school; and
- access to specialist advice and support.

To note: the duty in relation to the curriculum is broadly defined and includes more than the taught curriculum of the school; it is about the collective organised experiences and activities for pupils throughout the school day and beyond. The benefit of participation in the wider opportunities of the school is reflected in Ofsted expectations in relation to personal development:

### Ofsted

*There is strong take-up by pupils of the opportunities provided by the school. Disadvantaged pupils (including those with SEND), consistently benefit from this excellent work<sup>107</sup>.*

For the purposes of identifying objectives for your school's accessibility plan you need to be alert to any shortfall in the participation of disabled pupils in a whole range of activities:

**For example:** In addition to the 'taught' curriculum of the school, disabled pupils should be accessing all the opportunities during and beyond the school day, including:

- recreational opportunities at break times and lunchtimes;
- movement around the school;
- special events: e.g. sports days, visiting theatre groups and story-tellers;
- extra-curricular activities: e.g. breakfast clubs and after-school clubs; and
- school trips.

### A few questions for the team

- From our review so far, can we identify priorities we need to address to increase access to the curriculum? If so, turn your priorities into objectives and add them to the relevant section of your plan. If not, consider further questions below:
- Do we know how well disabled pupils are participating in the taught curriculum? And how well they are progressing and achieving?
- Do we know how well disabled pupils are participating in the life of the school beyond the classroom?
- Have we considered curriculum accessibility for disabled pupils with different impairments?
- Have curriculum leaders contributed their views?
- Have we drawn on the views of non-teaching staff to inform our objectives?
- Do we need to draw on the expertise of those beyond the school?

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<sup>107</sup> Ofsted (2024) *School Inspection Handbook*

**Action for the team:** Identify the objectives for increasing participation in the curriculum and add them into the relevant section of your plan. At a later point these will need to be discussed then worked into more detail as part of a set of action plans.

## 4.2. Improving the physical environment

**The Equality Act wording:** *A plan for [...] improving the physical environment of the school for the purpose of increasing the extent to which disabled pupils are able to take advantage of education and benefits, facilities or services provided or offered by the school*

### **If you have already identified priorities for improvements to the physical environment...**

As with the curriculum requirements, you may have identified key objectives for improvements to the physical environment of your school through the starting points for your plan: the vision and values that frame your plan; the views you gathered from pupils, parents, teachers and others; and the information and data that you have gathered.

If you have already identified objectives, add your proposed improvements to the physical environment section of your plan, using your existing framework or using the template in Appendix 2.

As with the curriculum requirements, improvements to the physical environment are broadly expressed, see above. This is not just about ramps and doorways, it is about how schools can improve the physical environment to enable disabled pupils to benefit from both the education provided at the school and the wider offer of the school, the *benefits, facilities and services* at the school. It includes both the external and internal environment.

The physical environment of the school has a differential impact on access for different groups of disabled pupils. Different aspects of the physical environment need to be considered in relation to different groups of pupils, so you need to consider the physical environment of your school in the light of your



understanding of the disabled pupil population of your school now and in anticipation of the population of children and young people who may come to your school as pupils in the future.

### **DfE Building Bulletin 93**

*In order to fulfil their duties under the Equality Act 2010, school client bodies should anticipate the needs of deaf and other disabled children as current and potential future users of the school<sup>108</sup>.*

You already have some key starting points for your plan: the vision and values that frame your plan; the views you gathered from pupils, parents, teachers and others; and the information and data that you have gathered. These may already point you in the direction of particular physical features of your school that are creating barriers, bearing in mind that pupils with a wide range of different impairments may need improvements to the physical environment to enable them to *take advantage of education and benefits, facilities or services provided or offered by the school*.

Depending on the nature of your school and any plans for re-building, refurbishing, developing or even decorating your school, you may want to undertake a more systematic review of the physical environment of your school.

### **pdnet's Accessibility Audit**

pdnet publish an Accessibility Audit for pupils with a physical disability as part of the pdnet Accessibility Planning Toolkit.

*The Toolkit aims to support schools to effectively evaluate the accessibility of their provision and plan to improve access for learners, particularly those with a physical disability<sup>109</sup>.*

Whilst the focus is on pupils with a physical disability, the audit tool is broadly-based. With any major work it is wise to undertake a full buildings accessibility audit and you may want to seek professional advice for this. Advice needs to be

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<sup>108</sup> DfE Building Bulletin 93: Acoustic Design of Schools - Performance Standard

<sup>109</sup> pdnet (2020) Accessibility Planning: A Toolkit for Schools: Developing your Accessibility Plan to support the effective inclusion of learners with a physical disability

broadly-based and take account of different pupils in your school now and those who may be coming to the school in the future<sup>110</sup>.

Changes to the physical environment may include a wide range of improvements:

**For example:** Improvements to the physical environment may include:

- improvements to lighting, signage, colour contrast;
- the acoustic environment, floor coverings;
- improvements to toilets, washing and changing facilities;
- changes to the layout of the playground and other common areas;
- the provision of ramps and lifts and improvements to doorways;
- improvements to dining areas;
- the provision of particular furniture and equipment to improve access; and
- the provision of quiet areas for study.

Some disabled pupils may have sensitivities that combine to increase stress, for example, dining areas may be noisy, but may also trigger responses to diet and smell that drive distressed behaviour. So, for some pupils it may be important to tailor arrangements with a combination of planned changes to the physical environment and *reasonable adjustments* to ensure that disabled pupils are not placed at a disadvantage.

It is important to bear in mind that many of the improvements driven by accessibility considerations for disabled pupils will benefit other pupils and staff as well.

**Research on acoustic improvements** for deaf pupils has identified benefits for all staff and pupils:

*[This research] indicates that in acoustically "dead" classrooms pupils generate less noise, which implies better behaviour and more attentive listening; and that this allows the teacher to speak less loudly, reducing vocal stress while still achieving a marked improvement in signal-to-noise ratio. [...] It is therefore concluded that all staff and pupils, with or without hearing impairment, would benefit if all classrooms were designed to the*

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<sup>110</sup> National Register of Access Consultants: provides a register of accredited access professionals.

*more stringent room acoustics standards intended for teaching pupils with hearing impairment<sup>111</sup>.*

An analysis of 250 studies for the DfE identified the benefit of improved acoustics for different groups of pupils with special hearing and communication needs, including autistic pupils:

*Reducing noise levels and reverberation time has also demonstrated effective improvements for children with autism by tripling attention span, improving response time by 60% and improving behavioural temperament<sup>112</sup>.*

For schools that count as *local partners*, see section 1.3, *Accessibility planning and the Children and Families Act 2014*, any significant improvements should be undertaken in consultation with the LA. They may have advance information about disabled children who may want to come to your school:

**For example:** The Head of a small rural school had allocated some capital to refurbish the toilets. She contacted the LA's Disability Access Group to ask how she could 'future proof' the refurbishment and ensure an accessible design. The LA knew of a disabled child in an early years setting who was likely to want to move to the school in the future and agreed to part-fund the work.

Improvements to the physical environment need to take into account the DfE's design and construction standards<sup>113</sup> and your school's Equality Act responsibilities.

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<sup>111</sup> Canning, D and James, A (2012) *The Essex Study Optimised classroom acoustics for all*. The Association of Noise Consultants

<sup>112</sup> Greenland, E et al (2023) *Inclusive Acoustic Design for Mainstream Schools: An evidence-based approach*. Paper for the 10th Convention of the European Acoustics Association

<sup>113</sup> The DfE sets out design and construction standards in Building Bulletins, see references.

### DfE guidance

The DfE provides a wide range of guidance on accessible design including:

- *Building Bulletin 93: Acoustic Design of Schools - Performance Standard*<sup>114</sup>
- *Building Bulletin 102: Designing for disabled children and children with SEN*<sup>115</sup>.

The references section provides a more comprehensive list of current guidance.

Some improvements may be achieved with little or no cost, for example, painting the edge of steps white or yellow; or the provision of a small quiet area might be achieved by a small amount of re-organisation. Other changes may be more costly so it is important to consider where improvements can be piggy-backed on other work to be done. This, in turn may affect the timing of improvements.

There are some principles that can help to keep down the costs of separate work to improve access:

- access considerations can often be piggy-backed onto other work where there is a small marginal cost, for example, installing visual alarms when the school is being re-wired;
- there is an even smaller cost in improving colour contrast when the school is being re-decorated;
- purchasing policies can take account of access requirements, for example, the purchase of an adjustable height science bench when benches are purchased, or checking for accessibility features when buying new software;
- when replacing a minibus, include a powerlift tailgate; and
- creative ideas may come at low cost or no cost.

### Improvements to the physical environment for state-funded schools

For state-funded schools, there may be ways of funding improvements to the physical environment of the school as part of wider programmes that support building improvement and maintenance works. The DfE provides capital funding

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<sup>114</sup> To note: also provides guidance to independent schools in support of the Independent School Standards: The Education (Independent School Standards) Regulations 2014 (SI 2014/3282)

<sup>115</sup> To note: area guidance in BB102 has been superseded by BB104 but still provides relevant design guidance.

each year to schools and bodies responsible for school buildings to maintain and improve the condition of the estate.

### **DfE Equality Impact Assessment**

DfE Equality Impact Assessment and prioritisation methodology for the school rebuilding programme:

*Schools and responsible bodies, which prioritise capital funding across the estates they are responsible for, also have responsibilities under the [Equality] Act and should take account of the needs of their pupils and teachers when making local investment decisions<sup>116</sup>.*

Some of the capital funding is for major projects, such as the DfE's School Rebuilding Programme which will rebuild or significantly refurbish buildings in the poorest condition in 500 schools and sixth form colleges. Other condition funding is available to schools and those responsible for school buildings through different routes depending on their size and type<sup>117</sup>:

- LAs, larger multi-academy trusts and large voluntary aided (VA) school bodies receive an annual School Condition Allocation (SCA) to invest in condition priorities;
- LAs also receive high needs provision capital allocation which can be used, in the light of LA priorities, to improve SEND provision or create new specialist places;
- smaller multi-academy, or stand-alone academy trusts, sixth form colleges, and VA schools that are not eligible for SCA can bid to the Condition Improvement Fund (CIF) each year;
- schools receive funding to spend on their own capital priorities through an annual Devolved Formula Capital (DFC) allocation;
- delegated funding can be used to meet the costs of particular equipment that may need to be provided for disabled pupils; and
- where alterations need to be made to improve access for a disabled teacher, funding may be available through the 'Access to work' programme.

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<sup>116</sup> DfE (2022) *School Rebuilding Programme: Equality Impact Assessment*

<sup>117</sup> DfE (2022) *School Rebuilding Programme: Equality Impact Assessment*

## For all schools

### A few questions for the team

From our review so far, can we identify improvements to the physical environment of the school to increase access to the life of the school for disabled pupils? If so, turn these improvements into objectives and add them to the relevant section of your plan. If not, consider further questions below:

- Have we considered all the different areas of the school: recreational areas, indoor and outdoor? Dining and assembly areas? Circulation space, corridors and stairs? Library, classroom and study areas?
- How well do different areas of the school facilitate the participation of disabled pupils in the life of the school?
- Have we considered accessibility for disabled pupils with different impairments?
- Have curriculum leaders contributed their views on the physical environment?
- Have we taken into account the views of disabled adults, teaching and non-teaching staff?
- Have we taken into account pupils likely to come to the school in the future, using local and national trends and advance information about individual pupils?
- Have we liaised with the LA about trends and children who may be coming to the school as pupils?
- Do we need to draw on the expertise of those beyond the school?

**Action for the team:** Identify the objectives for improvements to the physical environment and add them into the relevant section of your plan. At a later point these will need to be discussed then worked into more detail as part of a set of action plans.

## 4.3 Improving information for disabled pupils

**The Equality Act wording:** *A plan for [...]:*

- *improving the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled;*
- *[...] within a reasonable time;*
- *in ways which are determined after taking account of the pupils' disabilities and any preferences expressed by them or their parents*<sup>118</sup>.

### **If you have already identified priorities for improving information...**

As with the curriculum and physical accessibility requirements, you may have identified key priorities for improving information for disabled pupils through the starting points for your plan: the vision and values that frame your plan; the views you gathered from pupils, parents, teachers and others; and the information and data that you have gathered.

If you have already identified priorities, turn them into objectives and add them to the improving information section of your plan, using your existing framework or using the template in Appendix 2.

You need to consider the provision of information for pupils in the light of your understanding of the disabled pupil population of your school now and the population of children and young people who may come to your school as pupils.

Improving the accessibility of information is important in its own right, but it is also the gateway to accessing learning and all the opportunities provided by the school. The duty covers information that is core to teaching and learning, but also information to support participation in the wider activities of the school 'beyond the classroom'.

To note: the duty focuses on improving the ways in which information is made available to disabled pupils. Information may be provided for all pupils in the form of handouts, timetables, worksheets or notices, for example notices providing information about school events. The duty in the Equality Act is

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<sup>118</sup> The Equality Act 2010: Schedule 10 paragraph 3(2)(c) and (3)(a) and (b)

explicit about taking account of the preferences of disabled pupils and their parents, about how they like to receive information, and about doing this in a timely way.

As part of your starting points, you may have gathered useful information about preferences expressed by pupils or their parents. Identifying appropriate formats for disabled pupils must take account of pupils' impairments; access to information may be improved for different pupils by particular approaches:

**Schools can provide information in a range of ways, for example:**

- in simplified language, or Easy Read documents with visual resources, for pupils with learning difficulties;
- in picture or symbol versions for pupils with language and communication difficulties;
- using subtitles on slides may benefit many pupils, including deaf pupils;
- in a large font for pupils with vision impairment;
- in an accessible electronic format for pupils using screen reading software; or
- in Braille, in large print, in simplified language, as an audio or video file, through sign language, using a symbol system.

It's important not to make assumptions about how pupils prefer to receive information. The duty requires this to be *determined after taking account of the pupils' disabilities and any preferences expressed by them or their parents*.

If the information is delivered by a school app, it is important to take into account the accessibility standards for publicly funded bodies<sup>119,120</sup>.

**Expertise:** school staff may be able to provide information in a range of different formats, but, for some formats, there may be a need to train staff, for example in making documents available in Easy Read for pupils with a learning difficulty. In respect of more specialist formats, for example, Braille, advice should be sought from local LA support services. Schools should know how to access the relevant support services.

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<sup>119</sup> Gov.uk (2018) *Understanding accessibility requirements for public sector bodies*

<sup>120</sup> Publicly funded primary and secondary or nursery schools are partially exempt but must publish an accessibility statement and need to review and update the statement regularly.



**Building in accessibility:** schools can build in accessibility by, for example:

- selecting text books and worksheets designed to meet a diverse range of pupil needs when making purchasing decisions;
- a consideration of different formats built into the design of information produced for pupils;
- developing information in a range of formats at the design stage, rather than making repeated adaptations at a later stage; and
- adopting school-wide policies on the use of sub-titles on slides used in whole class teaching sessions.

**A few questions for the team**

- From our review so far, can we identify improvements in the provision of information for disabled pupils? If so, turn them into objectives and add them to the relevant section of your plan. If not, consider further questions below:
- Have we considered the information needs of disabled pupils with different impairments?
- Have we taken into account the views of pupils and their parents?
- Have curriculum leaders contributed their views on the provision of information?
- Do we need to draw on expertise in different communication systems from within or beyond the school?

**Action for the team:** Identify the objectives for improvements in the provision of information for disabled pupils and add them into the relevant section of your plan. At a later point these will need to be discussed then worked into more detail as part of a set of action plans.

## 5. Making it happen

### What the Equality Act says

A school accessibility plan must be:

- a plan for a three-year period;
- in writing;
- implemented; and
- reviewed during the three-year period to which it relates and revised as necessary.

The *responsible body* must have regard to the need to allocate adequate resources for implementing the plan<sup>121</sup>.

The CFA requires the governing body of a maintained school or maintained nursery school, and the proprietor, that is, the academy trust, of an academy school to ensure that *information as to the plan* is set out in the school's *SEN Information Report*<sup>122, 123</sup>.

The best plan is of little use if it isn't implemented. There is research from around the time of the first accessibility planning duties on schools that indicates that implementation was a weakness.

### Earlier research on accessibility planning

Research to support the implementation of the school accessibility planning requirements<sup>124</sup> following the Special Educational Needs and Disability Act 2001 found:

- of the three strands, improvements to the physical environment were most thoroughly addressed and, in some plans, the only area covered;
- impressive examples of schools working with feeder schools to inform their planning for disabled pupils; and

<sup>121</sup> The Equality Act 2010 Schedule 10, paragraph 4(1)

<sup>122</sup> The CFA, section 69(3)

<sup>123</sup> Schools not covered by the duty to publish an *SEN Information Report* will nonetheless want to consider whether to publish information about their accessibility plan or the plan itself.

<sup>124</sup> Department for Education and Skills (2006) *Implementing the Disability Discrimination Act in schools and early years settings*

- careful linkage to other school planning processes including school development planning, asset management planning, and the school's approach to professional development.

The weakest aspect of schools' plans tended to be:

- consultation with, or involvement of, other parties as part of the development of the plan;
- lack of specific objectives and actions;
- indeterminate timescales for completion of any actions, such as, 'ongoing'; and
- the allocation of general responsibilities to 'all staff'.

At around the same time, Ofsted's 2004 report on inclusive schools found that under half of the schools they visited had an accessibility plan and, *of those plans that did exist, the majority focused only on accommodation*<sup>125</sup>.

From the starting points for your accessibility plan, you have brought together:

- the vision and values that frame your accessibility plan;
- the views you have gathered from pupils, parents, staff and others; and
- the information and data you have reviewed.

These key starting points for your plan may have enabled you to identify priorities for your plan or you may have needed to undertake a more thorough review in each of the three areas of the duties:

- increased access to the curriculum for disabled pupils;
- improvements to the physical environment of the school to increase access to education and associated services at the school; and
- improvements in the provision of information for disabled pupils.

The next sections can help you to turn your objectives into actions:

- section 5.1 focuses on turning your objectives into actions and plans;
- section 5.2 focuses on responsibilities for the action plans;
- section 5.3 focuses on making your plan available and accessible; and
- section 5.4 focuses on keeping your plan under review and revising it as *necessary*.

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<sup>125</sup> Ofsted (2004) *Special Educational Needs and Disability: towards inclusive schools*

## 5.1 Turning objectives into actions

It is wise to approach the more detailed planning stages with the objectives that, if achieved, will make the most difference.

The next step is to identify actions to address the objectives. Insights into the stories underlying the views and the data you have gathered need to inform your school's approach to identifying actions to address your objectives.

**For example:** You may have looked at absence data in your school and recognised higher levels of absence, and higher levels of persistent absence, among disabled pupils. You might agree an overall objective to improve attendance of disabled pupils but what you do to improve attendance is likely to vary:

- for a disabled pupil who is being bullied, it may be about reviewing the school's approach to responding to and preventing bullying;
- where it relates to pupils with a medical condition, it might help, for example, to make provision within the school for pupils to take medication in privacy; or
- for a pupil with high levels of anxiety associated with their disability, there may be *reasonable adjustments* that have been made that worked well initially but have not been reviewed and updated.

To identify the most effective actions, it is likely that you will need to:

- discuss further with pupils, parents, staff and others the likely impact of different actions, and which are likely to be most effective; and
- review in the light of other objectives, with particular regard to the potential for linking any of the accessibility objectives to existing strands in the school development or improvement plan.

The *responsible body* may want to have sight of the identified objectives and the proposed actions before they are worked into more detail.

When you have agreed the actions, it's important to get these into an action plan with:

- outcomes or success criteria by which you can judge the success of the plan;
- the allocation of lead responsibilities, see next section 5.2, *Responsibility for the plan*;
- clear timescales;

- the necessary resources, human and financial – it may be helpful to identify the source of funding, for example, delegated budget, condition funding; and
- review mechanisms and dates.

A template for an action plan is provided in Appendix 3.

#### **A few questions for the team**

- Have we identified and agreed the most effective actions to address the objectives for our plan?
- Do these actions take into account disabled pupils with different impairments?
- Have we taken into account the views of curriculum leaders, non-teaching staff, pupils and their parents, and others we work with beyond the school?
- Have we taken into account other development aims and objectives for the school?
- Have we shared our identified objectives and our proposed actions with the *responsible body*?
- Where our proposed actions have been shared and agreed, have we put these into an action plan?

## **5.2. Responsibility for the plan**

Responsibility for your school's accessibility plan sits with the *responsible body*.

It's important that your school's plan shows:

- how the *responsible body* takes responsibility for the plan, sets a clear direction for it and expects regular reports on it;
- how and when the plan will be reviewed and revised, including how anyone might contribute to that process; and
- the mechanism for the evaluation of the plan and the evidence that will be used in the evaluation of the plan.

**Co-ordination:** your school may want to show how the accessibility plan fits in with other responsibilities, for example, under other legislation, or other parts of the Equality Act:

*SEN legislation:* many disabled pupils also have SEN and the effectiveness of the school's provision to meet SEN will therefore have an impact on disabled pupils.

*Under the Equality Act, schools have duties to others including staff, under Part 5, and other users of the school, under Part 3.*

*Under the PSED, section 149 of the Equality Act, publicly-funded schools have duties to disabled pupils and to pupils and others who share other *protected characteristics* and must have *due regard* to the need to: eliminate discrimination, harassment, victimisation and other *prohibited conduct* toward them; advance equality of opportunity between them and pupils who are not disabled; and foster good relations between disabled pupils and pupils who are not disabled. Maintained schools, academies and PRUs must also publish information and objectives under the PSED.*

It is helpful, and may create some efficiencies for your school, to co-ordinate these responsibilities with your school's accessibility plan.

These points from Ofsted make clear the importance they attach to provision being incorporated into the mainstream responsibilities of the school and of keeping plans under review as needs change:

**Ofsted:** *SEND provision in mainstream settings must be part of a continuum of provision, not a 'school within a school'. Moreover, it is crucial to recognise that for many children and young people, their needs change over time. Provision must adapt accordingly<sup>126</sup>.*

*Co-ordination with other school policies and plans:* Where other plans already reflect priorities for developing access for disabled pupils it makes sense to cut and paste relevant sections into your school's accessibility plan, or vice versa:

- school improvement plan;
- professional development plan;
- SEN policy;
- the policy setting out your school's arrangements for supporting pupils with medical conditions;
- anti-bullying policies;
- behaviour policies;
- asset management plan; and
- health and safety policies.

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<sup>126</sup> Ofsted (2021) *SEND: old issues, new issues, next steps*

You will also want to make sure that your school's plan is co-ordinated with other services and agencies, for example:

- with the LA's *accessibility strategy* for schools for which it is the *responsible body*;
- social services; and
- health agencies, particularly in respect of meeting the health needs of disabled pupils in school.

#### **A few questions for the team**

- Are our objectives and our proposed actions incorporated into our wider school development plan or school improvement plan?
- Have our proposed actions been incorporated into other plans and policies where they need to be, for example into professional development plans?
- Do we have clear criteria for judging the success of our plan?
- Are there clear timescales for monitoring and evaluating our plan?

## **5.3 Making the school's accessibility plan available**

School accessibility plans must be in writing and, for maintained schools, maintained nursery schools and academy schools, *information as to the plan* must be reported in the school's *SEN Information Report*<sup>127</sup>.

Schools not covered by the duty to publish an *SEN Information Report* will want to consider whether to publish information about their accessibility plan or the plan itself.

Most schools publish information such as their accessibility plan on their school website, along with other plans and policies, though the pdnet research found that only 67% did so<sup>128</sup>. A copy of your accessibility plan must be made available on demand, but it is up to your school how it makes it available. You might consider:

- making the plan available on the school website;
- making the plan available in different formats; and

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<sup>127</sup> Schedule 10 to the Equality Act 2010

<sup>128</sup> pdnet (2020) *Accessibility Planning: A Toolkit for Schools*

- ensuring the plan is accessible, for example, reviewing jargon and acronyms; typeface and font size; accessibility for screen-reader users; and how easy it is to navigate your plan.

In making your accessibility plan available, you should take care to ensure that individual pupils are not identifiable. This is a greater risk where the number of pupils with a particular impairment or condition is small.

#### **A few questions for the team**

- Have we made our accessibility plan available?
- Have we agreed how we share it and make it accessible to a wide range of stakeholders?
- Have we provided *information as to* our accessibility plan in our *SEN Information Report* or, for independent schools and non-maintained special schools, in some other way?
- Have we invited feedback on our accessibility plan?
- Do we have a mechanism for gathering comments and responding to them?
- How do we use feedback to inform the review and revision of our accessibility plan, or the development of our next plan?

## **5.4 Keeping the school's accessibility plan under review and revising it as necessary**

**The Equality Act:** *The responsible body must keep its accessibility plan under review during the period to which it relates and, if necessary, revise it<sup>129</sup>.*

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<sup>129</sup> The Equality Act Schedule 3, paragraph 10(5)



In keeping its accessibility plan under review, the *responsible body* for the school may want to monitor the action plan developed for the implementation of the accessibility plan. We suggest above, see section 5.1, that an action plan should include:

- outcomes or success criteria by which you can judge the success of the plan;
- the allocation of lead responsibilities, see section 5.2 above, *Responsibility for the plan*;
- clear timescales;
- the necessary resources, human and financial; and
- review mechanisms and dates.

We recommend that the action plan designed to support your accessibility objectives is co-ordinated with other school plans and incorporated into your wider school development plan or school improvement plan. This will make it simpler for the *responsible body* to monitor its implementation and keep the plan under review.

During the three-year period of the plan, new information may come to light, for example:

- you may receive feedback on the plan itself;
- a new intake of pupils may indicate that existing arrangements need to be revised or that new arrangements are needed;
- new views may be gathered in relation to accessibility or in relation to aspects of school life that affect accessibility, for example, a change in the school's approach to reducing and preventing bullying;
- evidence may suggest that actions the school is taking to address accessibility objectives are not effective or not working as intended in a particular area of the plan; or
- new data or other evidence may emerge.

New information may indicate that:

- the plan is working well and should continue as planned to the next review point;
- different actions may be needed, and it may be clear how you need to revise the plan;
- a more comprehensive review of an aspect of your accessibility plan may be needed in order to determine how your plan should be developed in response to the information you have received; or
- because your plan has nearly run its three-year period, you should feed the new information into the development of your next plan.

If the evidence does not point clearly to the changes that need to be made to your accessibility plan, it may be helpful to review your plan more comprehensively, gathering views afresh and reviewing other data and information. It may be helpful to identify the relevant sections of the handbook to support you in:

- the review; and
- in determining whether revision of the current plan is *necessary*.

#### **A few questions for the team**

- Have we received feedback on our accessibility plan?
- Does the feedback, or other new information, suggest the plan is working well?
- Or does it suggest we need to make changes to our plan?
- Do we have a mechanism for ensuring the *responsible body* has all the information they need in order to decide whether it is *necessary to revise* our accessibility plan?
- Do we have a mechanism for gathering information to inform the development of our next plan?

## References, links and resources

**To note:** Research, Regulations, guidance and advice on accessible design are grouped together following this section.

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- *Building Bulletin 93: Acoustic Design of Schools - Performance Standard*
- *Building Bulletin 102: Designing for disabled children and children with SEN<sup>130</sup>*
- *Building Bulletin 104: Area guidelines for SEND and alternative provision Including special schools, alternative provision, specially resourced provision and units*

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<sup>130</sup> To note: area guidance in BB102 has been superseded by BB104, but BB102 still provides relevant design guidance.

## Appendix 1: Accessibility plans: Checkpoints for responsible bodies<sup>131</sup>

The accessibility planning duties are set out in section 88 of and Schedule 10 to the Equality Act 2010 and are summarised in section 1.1 of this handbook. These checkpoints may help *responsible bodies* to understand how well their school is meeting the duties and other criteria for success.

Checkpoints	Notes for considering how well we are meeting the duties and considering other aspects of accessibility planning
<b>Our accessibility plan is informed by:</b>	
An ambitious vision of high quality, inclusive education for all	
A sound understanding of the definition of disability in the Equality Act	
The views of pupils, parents, staff and others who were consulted in its development	
Information we have about pupils in the school now and who may be coming to the school in the future	
The views of specialist services working with the school	
Key information and data about the presence, participation and achievement of pupils who may be disabled	
Where necessary, a more systematic audit of the physical environment	

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<sup>131</sup> The *responsible body* is the governing body, academy trust, or proprietor of the school, or, for a PRU, the LA, see section 1.2 of this handbook

Our accessibility plan meets the statutory requirements:	
<p>It covers the three strands of:</p> <ul style="list-style-type: none"> <li>• <i>increasing access to the curriculum for disabled pupils</i></li> <li>• <i>improvements to the physical environment of the school to increase access to education and associated services at the school</i></li> <li>• <i>improvements in the provision of information for disabled pupils where it is provided in writing for pupils who are not disabled</i></li> </ul>	
<p>It is a plan for a three-year period, running from 1 April of specific years, see section 1.1 of this handbook</p>	
<p>It is in writing</p>	
<p>It is being implemented - we check this regularly</p>	
<p>We review it during the three-year period to which it relates and <i>revise it as necessary</i></p>	
<p><i>We have regard to the need to allocate adequate resources for implementing the plan</i></p>	
<p>We provide <i>information as to the plan</i> in our school <i>SEN Information Report</i> or, if we are not required to publish such a report, in some other suitable way</p>	



<b>As part of the process of developing our plan we:</b>	
Reviewed and agreed objectives, before they were worked into detailed actions	
Agreed a framework for evaluating the success of the plan	
<b>We co-ordinate our accessibility plan with:</b>	
School plans for professional development	
Other school plans, for example our school development plan, our asset management plan	
School policies, for example, our anti-bullying policies, our behaviour policies	
For maintained schools, academies and PRUs, the publication of <i>equality information</i> and <i>equality objectives</i> required under the <i>PSED</i> <sup>132</sup>	
Local agencies, services and plans, for example, the LA's <i>Accessibility Strategy</i>	

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<sup>132</sup> For further information about the *PSED*, see: Council for Disabled Children (2025) *Equality Act 2010 and disabled pupils: a guide for governors and trustees*

## Appendix 2: Template for a school accessibility plan

**3-year period covered by the plan:**

**From: day/month/year - 1 April year**

### Introduction

Duties under the Equality Act 2010 require the *responsible body* for the school:

- not to discriminate against, *harass* or *victimise* disabled pupils;
- to plan to increase access to education for disabled pupils (an accessibility plan);
- to comply with the *Public Sector Equality Duty (PSED)*; and
- for maintained schools, academies and PRUs, to publish *equality information* and *objectives* under the *PSED*.

This plan sets out the proposals of the *responsible body* of our school to increase access to education for disabled pupils in the three areas required by the accessibility planning duties:

- increasing the extent to which disabled pupils can participate in the school's curriculum;
- improving the environment of the school to increase the extent to which disabled pupils can take advantage of education and associated services; and
- improving the delivery to disabled pupils of information which is provided in writing for pupils who are not disabled.

It is a requirement that the school recognises the need to resource the plan adequately, implements the plan and reviews and revises it as necessary.

Attached is a set of action plans showing how the school will address the objectives identified in the plan.

## A. Assessing accessibility

### **Vision and values: the purpose and direction of the school's plan**

Purpose and direction for the school's accessibility plan, see section 3.1 of this handbook:

For each suggested section of the plan, including the required sections, we include some examples of what schools noted in that section. Appendix 4 links the examples from each school together in excerpts from the accessibility plans of the five schools.

### **Examples<sup>133</sup> of what schools noted after reviewing their vision and values:**

**School A:** Our vision and values include a strong message about being inclusive but don't refer to a culture of involving pupils in contributing their views to school development plans.

**School B:** Our school statement is strong on celebrating the achievement of all pupils, but we think we need to review whether disabled pupils feel we do.

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<sup>133</sup> To note: schools are labelled so that readers can follow up how an identified barrier was picked up in their planning.

## **Gathering views: the views of those consulted during the development of the plan**

Key findings from gathering the views of pupils, parents, school staff and those working with the school, see section 3.2 of this handbook:

### **Excerpts from what schools noted after gathering views:**

**School A:** Pupils said:

- they didn't like being sent out of the class to work
- they liked being asked for their views!

**School B:** Didn't have a register of disabled pupils. They talked to pupils who were on the SEN register, pupils with medical conditions and pupils for whom they were making *reasonable adjustments*:

- they didn't like coming to after-school activities because other pupils who stay had been unkind to them
- some said their hard work wasn't recognised

The school spoke to parents during review meetings where they could:

- a number of comments indicated that pupils were struggling with some subjects: particularly maths and PE

#### **School C:**

Staff said:

- there were a lot of incidents arising during breaks and lunchtimes for autistic pupils

Services working with the school:

- autism outreach service said they would help to review arrangements during non-classroom times of day

## Information and data: pupil data and school audit

Key findings from gathering information and data, see section 3.3 of this handbook:

### Excerpts from what schools noted after reviewing their information and data:

**School B:** analysis of data on pupil progress in maths showed a widening gap between pupils with SEN and disabilities and their peers.

#### **School D:**

- Identified higher levels of behaviour incidents arising from challenges to pupils with SEN and disabilities for infringements of school rules.
- Analysis of incidents shows that many relate to pupils with communication difficulties, but also with learning difficulties and pupils with high levels of anxiety associated with their impairment.
- Staff are already making *reasonable adjustments* for some of the pupils.

**School E:** recent review with attendance support team identified patterns of absence and lateness among pupils who may be disabled.

## **B. Increasing access for disabled pupils: setting objectives for the school's plan**

### **Increasing the extent to which disabled pupils can participate in the school curriculum**

Identify key objectives relating to access to the school's curriculum for disabled pupils, see section 4.1 of this handbook:

### **Examples from curriculum objectives in school accessibility plans:**

**School B:** set objectives to:

- increase take-up of after-school activities by disabled pupils
- recognise a wider range of achievements
- reduce the growing gap in maths between pupils with SEN and disabilities and their peers.

**School C:** set an objective to enable disabled pupils, particularly autistic pupils, to enjoy recreational breaks.

**School D:** set an objective to reduce behaviour incidents, particularly relating to pupils with communication difficulties and those with learning difficulties.

**School E:** identified an objective to improve the school welcome to improve attendance and reduce lateness for pupils with SEN and disabilities.

**Improving the physical environment of the school to increase the extent to which disabled pupils can take advantage of education and associated services**

Identify key objectives for improvements to the physical environment for disabled pupils, see section 4.2 of this handbook:

**Examples from objectives relating to the physical environment in school accessibility plans:**

**School C:** set an objective to increase the take-up of outdoor recreational breaks, particularly for autistic pupils.

**School D:** set an objective to improve classroom acoustics in the light of improvements in concentration, pupil behaviour and learning and improvements in staff health in newly refurbished classroom.

**School E:** set an objective to improve the 'medical room' to make it more welcoming for pupils with medical needs.

**Improving the delivery to disabled pupils of information that is provided in writing for pupils who are not disabled**

Identify key objectives for improvements in information for disabled pupils, see section 4.3 of this handbook:

**Examples from schools: improving information for disabled pupils**

**School A:** to make whole class teaching more accessible and reduce the amount of time disabled pupils spend out of the classroom.

**School D:** identified the need to reduce behaviour incidents, particularly related to pupils with communication difficulties and those with learning difficulties.



## C: Making it happen

### Turning objectives into actions

Identify how the key objectives are turned into action plans, what the success criteria are for different elements in the plan, how resources are allocated and how progress is monitored, see section 5.1 of this handbook:

### Examples of ways in which schools put their plans into action:

#### School A:

- Explore the use of dual code, words with supporting images, in presentations in whole class teaching sessions.
- Staff in two year groups to develop the approach with a partner school and trainee educational psychologist to ensure they take account of the evidence<sup>134</sup>.
- Support assistants (in the same year groups) to develop new approach to supporting pupils in the classroom.
- Monitoring and evaluation of the impact, run by a trainee educational psychologist with local service.

**School C:** consulted on and planned two actions to address the accessibility of recreational breaks:

Provide quiet indoor option at lunchtime:

- Planned 'lunch club' to provide quiet activities at lunchtimes.
- Autism outreach service training senior pupils to lead activities.

Development of a quiet area of the playground to enable disabled pupils, particularly autistic pupils and pupils with high levels of anxiety, to enjoy outdoor recreational breaks. To be given priority in this year's review of capital projects and expected to be funded through Devolved Formula Capital.

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<sup>134</sup> EEF (2021) *Cognitive science approaches in the classroom: A review of the evidence*

### **Responsibility for the plan**

Identify who takes responsibility for the objectives in the plan and how, see section 5.2 of this handbook:

### **Examples of ways in which schools monitor the implementation of their plan:**

**School B** is reviewing their anti-bullying policy in the light of what pupils told them about after-school activities. The work is being led by the deputy head with the staff who lead after-school activities and will be reported at the beginning of next term.

**School D** incorporates the actions to meet their objectives into their school development plan so that overall progress is monitored by the governing body.

## **Making the school's accessibility plan available**

Identify how you make your accessibility plan available and accessible, see section 5.3 of this handbook:

### **Examples of how schools make their accessibility plan available:**

**School B:** *We have decided it would be helpful to publish this plan, as part of our commitment to transparency and accountability for our actions. We have removed references that might identify individual pupils.*

**School C:** *There is a summary of our accessibility plan available from our school office. It is written in simplified language.*

**School D:** *There is a link to a summary of our accessibility plan from our SEN Information Report.*

### Appendix 3: Template for an action plan

	Actions to address this objective	Lead responsibility	Resources	End date	Outcome, success criteria	Review of implementation
<b>Objective 1:</b>	1:					
	2:					
	3:					
<b>Objective 2:</b>	1:					
	2:					
<b>Objective 3:</b>	1:					
	2:					
	3:					
	4:					
<b>Objective 4:</b>	1:					
	2:					

## Appendix 4: Excerpts from five school accessibility plans referred to in the text and in the excerpts in the template plan

### School A:

Vision and values	Gathering views	Objectives	Actions
Our vision and values include a strong message about being inclusive but don't refer to a culture of involving pupils in contributing their views to school development plans.	Pupils said: <ul style="list-style-type: none"> <li>• they didn't like being sent out of the class to work</li> <li>• they liked being asked for their views!</li> </ul>	To make whole class teaching time more accessible and reduce the amount of time out of the classroom.	Explore the use of dual code, words and images, in presentations in whole class teaching sessions.  Staff in two year groups to develop the approach with a partner school and trainee educational psychologist to ensure they take account of the evidence <sup>135</sup> .  Support assistants (in the same year groups) to develop new approach to supporting pupils in the classroom.  Monitoring and evaluation of the impact, run by a trainee educational psychologist with local service.

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<sup>135</sup> EEF (2021) *Cognitive science approaches in the classroom: A review of the evidence*

## School B:

Vision and values	Gathering views	Information and data	Objectives	Actions
Our school statement is strong on celebrating the achievement of all pupils, but we think we need to review whether disabled pupils feel we do.	<p>Didn't have a register of disabled pupils. They talked to pupils who were on the SEN register, pupils with medical conditions and pupils for whom they were making <i>reasonable adjustments</i>:</p> <ul style="list-style-type: none"> <li>they didn't like coming to after-school activities because other pupils who stay had been unkind to them</li> <li>some said their hard work wasn't recognised.</li> </ul>		To increase take-up of after-school activities by disabled pupils.	Review anti-bullying policy in the light of what pupils told them about after-school activities. The work is being led by the deputy head with the staff who lead after-school activities and will be reported at the beginning of next term.
			To recognise a wider range of achievements.	Increase the range of achievements celebrated in weekly assemblies.
	School spoke to parents during review meetings where they could. Comments indicated that pupils were struggling with some subjects, particularly maths and PE.	Analysis of data on pupil progress in maths showed a widening gap between pupils with SEN and disabilities and their peers.	Reduce the growing gap in maths between pupils with SEN and disabilities and their peers.	Training by head of maths for non-specialist teachers teaching maths. Head of maths to work with non-specialist teachers on analysis of starting points.

## School C:

Gathering views	Objective	Actions
<p>Staff said:</p> <ul style="list-style-type: none"> <li>there were a lot of incidents arising during breaks and lunchtimes for autistic pupils.</li> </ul> <p>Services working with the school:</p> <ul style="list-style-type: none"> <li>autism outreach service said they would help to review arrangements during non-classroom times of day.</li> </ul>	<p>Reduce incidents at breaks and lunchtimes and identify ways of enabling disabled pupils, particularly autistic pupils, to enjoy recreational breaks.</p>	<p>Provide quiet indoor option at lunchtime:</p> <ul style="list-style-type: none"> <li>planned 'lunch club' to provide quiet activities at lunchtimes</li> <li>autism outreach service training senior pupils to lead activities.</li> </ul>
		<p>Development of a quiet area of the playground to enable disabled pupils, particularly autistic pupils and pupils with high levels of anxiety, to enjoy outdoor recreational breaks. To be given priority in this year's review of capital projects and expected to be funded through Devolved Formula Capital.</p>

## School D:

Gathering views	Information and data	Objectives	Actions
<p>Some pupils said they felt they were being picked on when they make mistakes.</p> <p>Discussions with parents highlighted getting reprimanded for:</p> <ul style="list-style-type: none"> <li>• not having right stuff with them for lessons</li> <li>• infringements of uniform rules</li> <li>• not being sure of next lessons</li> <li>• not understanding instructions.</li> </ul>	<p>Higher levels of behaviour incidents arising from challenges to disabled pupils and pupils with SEN for infringements of school rules.</p> <p>Analysis of incidents shows that many relate to pupils with communication difficulties, but also with learning difficulties and pupils with high levels of anxiety associated with their impairment.</p> <p>Staff are already making <i>reasonable adjustments</i> for some of the pupils.</p>	<p>Reduce behaviour incidents, particularly related to pupils with communication difficulties and those with learning difficulties.</p>	<p>Adjust a number of policies to generalise <i>reasonable adjustments</i> being made for some pupils:</p> <ul style="list-style-type: none"> <li>• text messages home for pupils with difficulties arriving in lessons with correct kit</li> <li>• visual timetables in all classrooms</li> <li>• simplified written step-by-step instructions for classroom tasks.</li> </ul> <p>Review of school uniform and consultation on introducing some additional items as a choice.</p>
<p>Staff using the new classroom said it had transformed things: lessons calmer, improved concentration.</p>	<p>Further information indicates improvements in concentration, pupil behaviour and learning, and improvements in staff health for those using the newly refurbished classroom.</p>	<p>Improve acoustics in more classrooms.</p>	<p>The school, a stand-alone academy trust, puts a bid into the Condition Improvement Fund for the next year.</p>



## School E:

Information and data	Gathering views	Objective	Actions	Resources
Recent review with LA attendance support team highlights patterns of absence and lateness among pupils who may count as disabled. No one pupil triggers a threshold.	<p>Discussions with parents and pupils themselves highlight a number of issues affecting attitudes towards school:</p> <ul style="list-style-type: none"> <li>A diabetic pupil is unhappy about the 'medical room' – it's not friendly and welcoming and people go in and out.</li> <li>A number of pupils with high levels of anxiety associated with their impairments find noise levels intimidating.</li> <li>A pupil who has to attend occasional hospital appointments feels stupid and gets anxious about not knowing answers when she has missed a lesson.</li> </ul>	Improve school welcome to improve attendance and reduce lateness for pupils with SEN and disabilities.	Re-decorate the 'medical room' to make it feel more welcoming. Raise awareness of the need for privacy and use 'hotel notices' on the door when occupied.	Devolved Formula Capital Communication of policy and termly reminders.
			A 'quiet' study area to be provided in two relevant classrooms by re-organisation of tables and provision of sound absorbing wall covering in the area. Provision of sound cancelling headphones during times of focus on written work.	Devolved Formula Capital Delegated budget
			<p>School policy change:</p> <ul style="list-style-type: none"> <li>To provide lesson materials and content in advance of absence for planned appointments.</li> <li>An opportunity to follow up with relevant teacher.</li> <li>School communications to ensure teachers alerted in advance.</li> </ul>	Communication of policy and termly reminders.