



Accessibility Audit & Plan

03/05/2019

May 2019

St Alban's Catholic Primary School

1. Executive Summary

An Accessibility Audit of St Alban's Catholic Primary School was commissioned by Mrs Jo Ayres, the head teacher. The audit visit took place on **03/05/2019**. Key staff visited included Jo Ayres and Helen Strawbridge, the school business manager. This was my second visit to the school and many previous recommendations were evident. The headteacher and senior leaders are relentless in driving improvements. The school is a very caring and happy place. Pupils are proud of their school and feel safe.

Further information was obtained from the school web site and by pre-visit questionnaire.

Accessibility and Equality legislation as it applies in schools is summarised in Sections 2 and 3 below.

Contextual background information is summarised in Section 7. The school context is considered when suggesting recommendations for improvements to accessibility.

The constraints and limitations to the audit are considered in Section 8.

The detailed Access Audit follows in Section 10 and is summarised in Section 1.1 below. The Audit section describes accepted best practice where appropriate.

The school is very well laid out, with classrooms being on the first and second floors and there is ample space for social interaction. There is an array of suitable, age related resources available in each class room to maximise the opportunities to stretch and challenge their pupils and differentiate the delivery to suit the needs and abilities they currently have. The school is keen to work with parents/carers and outside agencies to provide for the needs of all future pupils. At St. Alban's Catholic Primary School they are blessed to have an enclosed secure site that includes a marked playground with a climbing wall traversing panel, a quiet seating area and large playing field with a range of outdoor play and sports equipment, a wild flower meadow bank and a natural area, where brambles and grasses nestle under the trees and shrubs.

The SENCO is well supported by the school management, teaching team and head teacher. A lot of time, planning and thought has gone into providing an inclusive delivery of education with an assortment of resources, assistive technologies and support provided to maximise progress for all their current pupils. Pupils who have special educational needs (SEN) and/or disabilities and those who have challenging behaviour are well supported and make good progress in the school. The school's leadership for pupils who have SEN and/or disabilities, particularly for those pupils who have more complex needs, is very effective. The leader is knowledgeable and committed to providing strong specialist support. The school has increased staffing in all classes every morning to provide more opportunities for teachers to track each pupil's progress carefully.

Based upon the audit findings, the suggested School Accessibility Plan together with a suggested Action Plan, is provided at Sections 11 and 13 respectively.

It is for the Schools' senior leadership and management to take ownership of actions to improve accessibility, in the context of the many competing demands schools face. The priorities suggested in the Accessibility Action Plan may be helpful in that regard.

It is suggested that the Schools' own development and improvement plan (SIP) contains targets linked to this Accessibility Action Plan, to encourage allocation of staffing and budget resource to support further improvements to accessibility.

Links to enable school staff to access guidance and support is provided in Section 14.

Equality Act Audits relationship with St Alban's Catholic Primary School does not end with the submission of this document. We remain available by telephone or email for further discussion, advice and support throughout the currency of this audit. We especially welcome feedback regarding your progress. Please do share your success stories with us.

Thank you for the opportunity to work with the school, and the hospitality extended during our visit to the school. We look forward to having the opportunity to support the school again, should you kindly choose to reappoint us.

Lesley Karen Mifsud

06/05/2019

For Equality Act Audits.

1.1 Table of Audit Findings

This table summarises the audit outcomes. The detailed findings are given in Section 10 below.

Action Plan recommendations, where appropriate, are provided in Section 13.

Reference	Audit Aspect	Outcome 2019
Access to Information		
10.1.1	Staff Training – Is awareness training provided to enable all staff to understand and recognise disability issues?	Compliant
10.1.2	Arrangements for providing information in simple language, large print, via digital audio, by Braille	Compliant
10.1.3	Is the school Web site and social media content accessible?	Compliant
10.1.4	Is information presented to groups in a user-friendly way for people with disabilities which affect their vision?	Compliant
10.1.5	Staff familiarity with technologies and support strategies and processes developed to assist people with disabilities	Compliant
10.1.6	Complaints process	Compliant
Access to Site and Facilities		
10.2.1	Access via Public Transport	Compliant
10.2.2	Arrangements for disabled parking	Improvement Recommended
10.2.3	Security gates and barriers	Exemplary
10.2.4	Access through the site to Reception	Compliant
10.2.5	Reception facilities	Improvement Recommended
10.2.6	External areas, movement between buildings	Improvement Recommended
10.2.7	Emergency Evacuation and Lockdown Procedures	Exemplary
10.2.8	Internal movement – corridors and evacuation routes	Improvement Recommended
10.2.9	Internal movement – stairs and lifts	Improvement Recommended
10.2.10	Accessible Toilets	Compliant
10.2.11	Changing Rooms	Compliant
10.2.12	Medical Facilities	Compliant
10.2.13	Internal Signage	Compliant
10.2.14	Internal décor and finishes	Compliant

10.2.13	Lighting	Exemplary
10.2.16	Dining and Catering	Compliant
10.2.17	Social spaces & quiet spaces	Compliant
10.2.18	Doors	Improvement Recommended
10.2.19	Teaching and study spaces	Exemplary
10.2.20	Furniture & teaching Equipment	Compliant
Access to Education		
10.3.1	Training & accreditation of Teachers and Teaching Assistants	Compliant
10.3.2	Pre-admission visits	Exemplary
10.3.3	Admission	Exemplary
10.3.4	Safeguarding	Exemplary
10.3.5	Pupils with Temporary, Emerging or ongoing Health Care Needs	Exemplary
10.3.6	Access to the Curriculum	Exemplary
10.3.7	Lesson planning and support for pupils with disabilities and SEN	Exemplary
10.3.8	Access to Educational Visits and Extra Curricular Activities	Compliant
10.3.9	Pupil Outcomes	Compliant
10.3.10	Staffing & Leadership	Exemplary

Introduction to Accessibility and Equality Legislation in Schools

Whilst this audit and report focuses primarily upon accessibility for disabled persons, schools still need to comply with the whole of the Equality Act 2010. To that end this section introduces the wider Act so that the disability access issues raised can be considered within the context of the overall Act.

The following has largely been extracted and paraphrased from *The Equality Act 2010 and Schools – Departmental Advice for school leaders, school staff, governing bodies and local authorities*, Department for Education (May 2014) as permitted under Open Government Licence V2.0.

1.2. Overview of The Equality Act 2010

1.2.1 The Equality Act 2010 replaced nine major Acts of Parliament and almost a hundred sets of regulations which had been introduced over several decades. It provides a single, consolidated source of discrimination law, covering all the types of discrimination that are unlawful. It simplifies the law by getting rid of anomalies and inconsistencies that had developed over time, and it extends protection against discrimination in certain areas.

1.2.2 As far as schools are concerned there are some changes, but for the most part the effect of the law is the same as it has been in the past – schools which are already complying with the law will not find major differences in what they need to do. In some areas – in particular the introduction of the public sector equality duty which has replaced the three separate duties on race, disability and gender – the overall effect of the Act is to reduce a certain amount of bureaucracy and so should be less burdensome and more effective.

1.3. Schools: who and what the Act applies to

1.3.1 In England and Wales the Act applies to all maintained and independent schools, including Academies, and maintained and non-maintained special schools. In Scotland it applies to schools managed by education authorities, independent schools and schools receiving grants under section 73(c) or (d) of the Education (Scotland) Act 1980.

1.3.2 The Act makes it unlawful for the responsible body of a school to discriminate against, harass or victimise a pupil or potential pupil:

- in relation to admissions,
- in the way it provides education for pupils,
- in the way it provides pupils access to any benefit, facility or service, or
- by excluding a pupil or subjecting them to any other detriment.

1.3.3 The “responsible body” is the governing body or the local authority for maintained schools in England and Wales, the education authority in the case of maintained schools in Scotland, and the proprietor in the case of independent schools, Academies or non-maintained special schools. In practice, any persons acting on behalf of the responsible body – including employees of the school – are liable for their own discriminatory actions, and the responsible body is also liable unless it can show that it has taken all reasonable steps to stop the individual from doing the discriminatory action or from doing anything of that kind.

1.3.4 The Act deals with the way in which schools treat their pupils and prospective pupils: the relationship between one pupil and another is not within its scope. It does not therefore bear directly on such issues as bullying by pupils. However, if a school treats bullying which relates to a protected ground less seriously than

other forms of bullying – for example failing to protect a disabled pupil against bullying by classmates – then it may be guilty of unlawful discrimination.

1.3.5 The school's liability not to discriminate, harass or victimise does not end when a pupil has left the school, but will apply to subsequent actions connected to the previous relationship between school and pupil, such as the provision of references on former pupils or access to "old pupils" communications and activities.

1.4. Protected characteristics

1.4.1 The term "protected characteristics" is used as a convenient way to refer to the personal characteristics to which the law applies.

1.4.2 It is unlawful for a school to discriminate against a pupil or prospective pupil by treating them less favourably because of their:

- sex
- race
- disability
- religion or belief
- sexual orientation
- gender reassignment
- pregnancy or maternity

1.4.3 This audit and report specifically focusses upon disability access. <Equality Act Audits can undertake separate audits of compliance in the remaining areas – please contact us for further details and a quotation>

2. Special provisions for disability

The following has been extracted and paraphrased from *The Equality Act 2010 and Schools – Departmental Advice for school leaders, school staff, governing bodies and local authorities*, Department for Education (May 2014) as permitted under Open Government Licence V2.0.

2.1.1 The law on disability discrimination is different from the rest of the Act in several ways. It works in only one direction – that is to say, it protects disabled people but not people who are not disabled. This means that schools are allowed to treat disabled pupils more favourably than non-disabled pupils, and in some cases are required to do so, by making reasonable adjustments to put them on a more level footing with pupils without disabilities.

2.1.2 The definition of what constitutes discrimination is more complex. Provision for disabled pupils is closely connected with the regime for children with special educational needs

2.1.3 The overriding principle of equality legislation is generally one of equal treatment - i.e. that you must treat a black person no less well than a white person, or a man as favourably as a woman. However, the provisions relating to disability discrimination are different in that you may, and often must, treat a disabled person more favourably than a person who is not disabled and may have to make changes to your practices to ensure, as far as is reasonably possible, that a disabled person can benefit from what you offer to the same extent that a person without that disability can. So, in a school setting the general principle is that you must treat male and female, black and white, gay and straight pupils equally - but you may be required to treat disabled pupils differently. Discrimination is also defined rather differently in relation to disability

2.1. Provisions relating to disability

The disability provisions in the Equality Act mainly replicate those in the former Disability Discrimination Act (DDA). There are some minor differences as follows:

- Unlike the DDA the Equality Act does not list the types of day to day activities which a disabled person must demonstrate that they cannot carry out, thus making the definition of disability less restrictive for disabled people to meet.
- Failure to make a reasonable adjustment can no longer be defended as justified. The fact that it must be reasonable provides the necessary test.
- Direct discrimination against a disabled person can no longer be defended as justified – bringing it into line with the definition of direct discrimination generally.
- From September 2012 schools and local authorities have a duty to supply auxiliary aids and services as reasonable adjustments where these are not being supplied through Special Educational Needs (SEN) statements or from other sources. In practice this will already be being done in many cases.

2.2. Definition of disability

2.2.1 The Act defines disability as when a person has a 'physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day to day activities.' Some specified medical conditions, HIV, multiple sclerosis and cancer are all considered as disabilities, regardless of their effect.

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

2.3. Unlawful behaviour regarding disabled pupils

2.3.1 Direct discrimination

A school must not treat a disabled pupil less favourably simply because that pupil is disabled – for example by having an admission bar on disabled applicants.

A change for schools in this Act is that there can no longer be justification for direct discrimination in any circumstances. Under the DDA schools could justify some direct discrimination – if was a proportionate means of meeting a legitimate aim. What the change means is that if a school discriminates against a person purely because of his or her disability (even if they are trying to achieve a legitimate aim) then it would be unlawful discrimination as there can be no justification for their actions.

2.3.2 Indirect discrimination

A school must not do something which applies to all pupils, but which is more likely to have an adverse effect on disabled pupils only – for example having a rule that all pupils must demonstrate physical fitness levels before being admitted to the school – unless they can show that it is done for a legitimate reason and is a proportionate way of achieving that legitimate aim.

2.3.3 Discrimination arising from disability

A school must not discriminate against a disabled pupil because of something that is a consequence of their disability – for example by not allowing a disabled pupil on crutches outside at break time because it would take too long for her to get out and back. Like indirect discrimination, discrimination arising from disability can potentially be justified.

2.3.4 Harassment

A school must not harass a pupil because of his disability – for example, a teacher shouting at the pupil because the disability means that he is constantly struggling with class-work or unable to concentrate.

2.4. Public Sector Equality Duty

The Public Sector Equality Duty requires all public authorities, including schools, to have due regard to the need to:

- Eliminate discrimination and other conduct prohibited by the Act;
- Advance equality of opportunity
- Foster good relations

2.5 Disability Equality Duty

Schools previously had a statutory duty which required them to take proactive steps to tackle disability discrimination and promote equality of opportunity for disabled pupils. Under the Equality Act, this has been replaced by the *general equality duty* not to discriminate, and the *specific duties* below.

2.5.1 Reasonable adjustments and when they must be made

The duty to make reasonable adjustments applies only to disabled people. For schools the duty is summarised as follows:

- Where something a school does places a disabled pupil at a disadvantage compared to other pupils then the school must take reasonable steps to try and avoid that disadvantage.
- Schools will be expected to provide an auxiliary aid or service for a disabled pupil when it would be reasonable to do so and if such an aid would alleviate any substantial disadvantage that the pupil faces in comparison to non-disabled pupils. Schools are not subject to the requirement of reasonable adjustment duty concerned with make alterations to physical features because this is already considered as part of their planning duties.

2.5.2 Auxiliary aids and services

The duty to provide auxiliary aids as part of the reasonable adjustment duty is a change for all schools from September 2012 and also extends to maintaining local authorities.

2.5.2.1 Many disabled children will have a SEN and may need auxiliary aids which are necessary as part of their SEN provision; in some circumstances as part of a formal SEN statement. These aids may be provided in the school under the SEN route, in which case there will be no need for the school to provide those aids as part of their reasonable adjustment duty.

2.5.2.2 Schools will have to consider whether to provide auxiliary aids as a reasonable adjustment for disabled children. This will particularly be the case where a disabled child does not have an SEN statement or where the statement does not provide the auxiliary aid or service.

2.5.2.3 There should be no assumption, however, that if an auxiliary aid is not provided under the SEN regime then it must be provided as a reasonable adjustment. Similarly, whilst schools and LAs are under the same reasonable adjustment duty, there should be no assumption that where it is unreasonable for a school to provide an auxiliary aid or service, for example on cost grounds, it would then be reasonable for the local authority to provide it. All decisions would depend on the facts of each individual case. The nature of the aid or service, and perhaps also the existence of local arrangements between schools and local authorities, will help to determine what would be reasonable for the school or the LA to provide. For example, where there is a centrally organised visual or hearing impairment service it may be reasonable for the local

authority to provide more expensive aids or support through that service but not reasonable for an individual school to have to provide them.

2.5.2.4 The term "auxiliary aids" found in the Equality Act 2010 covers both auxiliary aids and services but there is no legal definition for what constitutes auxiliary aids and services. Considering the everyday meaning of the words, is, however, helpful. Legal cases have referred to the Oxford English Dictionary definition of auxiliary as "helpful, assistant, affording aid, rendering assistance, giving support or succour" and that auxiliary aids and services "are things or persons which help." Examples of what may be considered an auxiliary aid could be; hearing loops; adaptive keyboards and special software. However, the key test is reasonableness and what may be reasonable for one school to provide may not be reasonable for another given the circumstances of each case.

2.5.2.5 Some disabled children will have a need for auxiliary aids which are not directly related to their educational needs or their participation in school life, for example, things which are generally necessary for all aspects of their life, such as hearing aids. It is likely to be held that it would be unreasonable for a school to be expected to provide these auxiliary aids.

2.5.3 Making reasonable adjustments

2.5.3.1 A minor change for schools is that a failure to make a reasonable adjustment cannot now be justified, whereas under the previous disability discrimination legislation it could be. However, this change should not have any practical effect due to the application of the reasonableness test – i.e. if an adjustment is reasonable then it should be made and there can be no justification for why it is not made. Schools will not be expected to make adjustments that are not reasonable.

2.5.3.2 In addition to having a duty to consider reasonable adjustments for individual disabled pupils, schools will also have to consider potential adjustments which may be needed for disabled pupils generally as it is likely that any school will have a disabled pupil at some point. However, schools are not obliged to anticipate and adjust for every imaginable disability and need only consider general reasonable adjustments - e.g. being prepared to produce large font papers for pupils with a visual impairment even though there are no such pupils currently admitted to the school. Such a strategic and wider view of the school's approach to planning for disabled pupils will also link closely with its planning duties.

2.5.3.3 The Act does not set out what would be a reasonable adjustment or a list of factors to consider in determining what is reasonable. It will be for schools to consider the reasonableness of adjustments based on the circumstances of each case. However, factors a school may consider when assessing the reasonableness of an adjustment may include the financial or other resources required for the adjustment, its effectiveness, its effect on other pupils, health and safety requirements, and whether aids have been made available through the Special Educational Needs route.

2.5.3.4 Cost will inevitably play a major part in determining what is reasonable and it is more likely to be reasonable for a school with substantial financial resources to have to make an adjustment with a significant cost, than for a school with fewer resources. For example, a small rural primary school may not be able to provide specialised IT equipment for any disabled pupils who may need it and it may not be reasonable for the school to provide that equipment. On the other hand, a much larger school might reasonably be expected to provide it.

2.5.3.5 Often, though, effective and practicable adjustments for disabled pupils will involve little or no cost or disruption and are therefore very likely to be reasonable for a school to have to make.

2.5.3.6 Schools generally will try to ensure that disabled pupils can play as full a part as possible in school life and the reasonable adjustments duty will help support that. However, there will be times when adjustments cannot be made because to do so would have a detrimental effect on other pupils and would therefore not be reasonable – for example, if a school put on a geology field trip which necessarily involved climbing and

walking over rough ground and after fully considering alternatives to accommodate a disabled pupil in a wheelchair who could not take part it determined that there was no viable alternative or way of enabling the disabled pupil to participate or be involved, it would not have to cancel the trip as originally planned. This is unlikely to constitute direct discrimination or failure to make a reasonable adjustment

2.5.3.7 The reasonable adjustments duties on schools are intended to complement the accessibility planning duties and the existing SEN statement provisions which are part of education legislation, under which local authorities must provide auxiliary aids to pupils with a statement of special educational need.

2.5.4 Schools' duties around accessibility for disabled pupils

2.5.4.1 Schools and LAs need to carry out *accessibility planning* for disabled pupils. These are the same duties as previously existed under the DDA and have been replicated in the Equality Act 2010.

2.5.4.2 Schools must create and provide adequate resources to implement *accessibility plans* which are aimed at:

- increasing the extent to which disabled pupils can participate in the curriculum;
- improving the physical environment of schools to enable disabled pupils to take better advantage of education, benefits, facilities and services provided; and
- improving the availability of accessible information to disabled pupils.

2.5.4.3 School accessibility plans shall be reviewed at least every 3 years.

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

2.5.4.5 OFSTED inspections may include a school's accessibility plan as part of their review.

2.5.5 Local authorities' duties around accessibility for disabled pupils

LAs must, for the schools for which they are responsible, prepare accessibility strategies based on the same principle as the access plans for schools.

3. Purpose of Audit

- 3.1. The audit addresses and recognises the requirements of the Equality Act 2010. The report includes recommendations for required remedial actions and ongoing monitoring and control measures. Guidance is also referred to such as BS8300: 2009 - Design of Buildings and Their Approach to Meet the Needs of Disabled People - Code of Practice; along with other applicable sources where appropriate.
- 3.2. The focus of this report is to ensure that the school meets with the requirements of part IV of the Equality Act and so does not discriminate against disabled pupils.
- 3.3. However, the report will also deal with the obligations under section III of the Equality Act 2010 which relates to the provision of services to members of the public.
- 3.4. To achieve this, the report will identify where communication strategies, the property, and educational teaching and support processes do not meet current legislation or best practice standards. The report will recommend ways to overcome these issues. Recommendations may incorporate physical adaptations to the site, changes to policies and procedures or a combination of these.

13. Action Plan

13.1. Access to Information							
Audit Ref	Audit Item	Suggested Actions	Priority	Budget Implications	Target date for completion	Ownership of Task (school to insert name)	Date Completed

13.2. Access to Site and Facilities							
Audit Ref	Audit Item	Suggested Actions	Priority	Budget Implications	Target date for completion	Ownership of Task (school to insert name)	Date Completed
10.2.2	Disabled Parking	Place a sign on the wall in front of the newly marked out accessible bay. Re paint the 2 bays which are at the front of the school and close to the accessible entrance on the first	B	L	2019		

		<p>floor, if these are going to be used by the school visitors/staff/parents and carers.</p> <p>Continue to point out the dangers of parking on the hazard lines and introduce some form of policing outside the school gates every morning.</p> <p>Install a sign at the car park entrance showing the location for the disabled parking.</p>					
10.2.5	Reception Facilities	<p>Purchase a portable hearing loop</p> <p>Provide a seat with arms</p>	B	L	2019		
10.2.6	External Areas	<p>Ensure that all steps have handrails each side and that nosings are renewed at the first sign of wearing.</p> <p>When replacing signage, incorporate the use of tactile signage.</p>	B	L	2019		

10.2.8	Internal movement – Corridors and Evacuation routes	Systematically check that corridors and escape routes are free from obstructions and that floor surfaces are free from slip and trip hazards.	A	N	Ongoing		
10.2.9	Internal movement – Stairs and Lifts	Ensure that there are two sets of handrails affixed to the wall side on each internal staircase. The handrails need to be continuous with the landings.	B	L	2020		
10.2.10	Accessible Toilets	<p>Ensure that the cord of the alarm system is hanging freely.</p> <p>Ask cleaning staff to check when cleaning the toilets that the alarm cord is left hanging freely.</p> <p>Check that the nursery staff would know what to do should the alarm sound.</p>	A	N	OG		
10.2.13	Internal Signage	It is recommended to sign all classroom doors in a uniform manner.	C	L	OG		
10.2.18	Doors	Change any door handles which do not contrast with the door or paint	B	L	OG		

		<p>the handles so that they do contrast.</p> <p>Change the old door handles on classrooms to the D shape handle.</p> <p>Remove all posters from the vision panels on the classroom doors.</p>						
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