



Defence
Children
Services

DCS Directive

MOD Schools Accessibility Strategy

DCS Jan 19 v1.0

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| Authorisation | Director DCS |
| Senior Responsible Owner | AH Specialist Support Services |
| Point of Contact | |
| Review Date | Jan 2022 |
| Related Policy/Guidance | Equality Act 2010 |
| | DCS Directive 3.2.22 SEND |

Statutory Requirement

1. All local authorities in Great Britain must have an Accessibility Strategy for the schools they maintain. This is a requirement of law under Schedule 10 of the Equality Act 2010 and specifically relates to pupils with a disability.
2. Accessibility Strategies share the same principles as Accessibility Plans and define over time, how schools will be supported to:
 - a. Increase the extent to which disabled pupils can participate in the curriculum;
 - b. Improve the physical environment of schools to enable disabled pupils to take better advantage of education, benefits, facilities and services provided;
 - c. Improve the availability of accessible information to disabled pupils.
3. Where MOD personnel are based in overseas locations the MOD acts in lieu of a UK local authority and delivers **so far as is reasonably practicable** statutory or near-statutory services following English legislation.
4. Overseas, DCS fills a similar role to a local authority Children's Services Department and delivers (or ensures/assures the delivery of) key children's services (Safeguarding, Education, Health, Social Care etc.), so far as is reasonably practicable. It is important to note that DCS is under no statutory obligation to provide these services.
5. Whilst MOD schools and settings can support a range of SEND they are not mandated or resourced to support children with complex needs. Service parents and Commands are therefore directed, through JSP 770, to use the MOD's Assessment of Supportability Overseas (MASO) prior to and, where special and/or additional needs emerge, during a posting.

Aim

6. This document defines how MOD schools and settings can apply, where reasonably practicable, the principles of accessibility.

Scope

7. This document applies to MOD schools overseas. Queen Victoria School (Dunblane) follows Scottish National statutory requirements for Accessibility.

Roles and Responsibilities

8. All MOD schools and settings are to develop their Accessibility Plans using this Strategy, paying attention to the actions outlined in the Implementation section. Schools may adapt the template Accessibility Plan at Annex A.
9. Health and Safety leads should be involved in the formulation of Accessibility Plans.
10. All MOD schools are to ensure that Accessibility Plans are endorsed by their School Governance Committee (SGC) and progress against the plan is routinely reported to the SGC.
11. All MOD schools and settings are to publish their Accessibility Plans on their school website.
12. Accessibility audits will be conducted by school SENDCOs and submitted to the Assistant Head DCS Specialist Support Services in Jun of even-numbered years (i.e. every two years).

Reasonable Adjustments

13. DCS and the schools under its authority, can provide adjustments, where reasonably practicable, for disabled pupils to ensure that they can participate in their education and engage in the other benefits, facilities and services that the school provides. Examples of reasonable adjustments are at Annex B.
14. The reasonable adjustments duty comprises:
 - a. Provisions, criteria and practices;
 - b. Auxiliary aids and services;
 - c. Physical features.
15. In seeking to follow English legislation where it is reasonably practicable to do so, DCS and its schools are to anticipate the needs of potential disabled pupils in addition to those already attending the school and make adjustments, where reasonably practicable in the overseas context.
16. HQ DCS, acting in lieu of a local authority, is responsible for making adjustments, where reasonably practicable, to the physical features of its schools. There is a duty on schools to plan better access for disabled pupils generally through Accessibility Plans.

Intent

17. DCS's mission is to:

‘Educate the child, support the family, defend the nation’.

18. To achieve this, DCS will:

- a. Work with the MOD schools for which it is responsible to ensure that disabled pupils are not disadvantaged or discriminated against because of their disability;

- b. Work with MOD schools and school governors to agree reasonable adjustments which will allow disabled pupils full access to school facilities and activities;
- c. Work with MOD schools to identify and plan for the needs of disabled pupils.

Defence Context

19. In the overseas Defence context, DCS does not have access to the range of specialist provisions for children and young people with SEND. In this context MOD schools can provide, where reasonably practicable, for a range of SEND but not the full range of severe and/or complex SEND.

20. The level of support that can be offered differs according to location. All MOD schools and local Commands/Commanders are required to publish their local offer on their website.

Implementation

21. DCS will work with the MOD schools for which it is responsible to:

- a. Increase access to the curriculum for disabled pupils;
- b. Improve the physical environment for schools to increase access for disabled pupils;
- c. Make written information more accessible to disabled pupils by providing information in a range of different ways where reasonably practicable.

22. This will be achieved through:

Increasing access to the curriculum

| HQ DCS will | MOD schools and settings will |
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| Support schools, including head teachers, SENDCOs, in relation to strategies, policies and systems available through DCS and the MOD. | Meet the duties set out in the Equality Act 2010 and Children and Families Act 2014 with regard to SEND, where reasonably practicable. |
| Ensure availability of training and CPD opportunities for school staff to support and enhance the understanding of accessibility in the curriculum. | Include improvements that increase access to the curriculum in the Accessibility Plan published on the school website. |

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| <p>Allocate funding for the provision of reasonable adjustments.</p> | <p>Plan for and teach children with learning needs through a range of interventions and teaching strategies.</p> <p>Plan for and deliver appropriate interventions and support for vulnerable children.</p> <p>Establish effective mechanisms for assessing and monitoring the progress of vulnerable groups.</p> <p>Evaluate the outcomes of provision and adapt provision accordingly.</p> <p>Ensure effective support for vulnerable children in transition.</p> <p>Apply funding appropriately to ensure that vulnerable groups are not disadvantaged.</p> <p>Facilitate effective professional development for staff and governors.</p> <p>Provide opportunities for SENDCOs to share good practice and keep up to date with professional development.</p> <p>Keep parents/carers informed.</p> |
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Improving access to the physical environment

| HQ DCS will | MOD schools will |
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| <p>Plan new buildings and significant extensions/adaptations that comply with accessibility requirements and facilitate access for children with disabilities, where reasonably practicable.</p> <p>Ensure that any new buildings or extensions are appropriately designed in line with accessibility and Health and Safety requirements.</p> <p>Routinely review existing provision in schools and settings for which DCS is responsible to ensure that they comply with accessibility legislation and requirements, where reasonably practicable.</p> <p>Monitor transition arrangements for children coming into MOD schools and those moving across school phases.</p> <p>Work with MOD schools, Educational Psychology and Advisory Specialists to assist with issues regarding individual placements.</p> | <p>Routinely review the physical accessibility of the school buildings and site and make timely arrangements to accommodate access where reasonably practicable.</p> <p>Include improvements that increase access to the physical environment in the Accessibility Plan published on the school website.</p> <p>Comply with anticipatory obligations as set out in the Equality Act 2010.</p> <p>Respond to the expectations set out in this DCS strategy and national guidance on meeting the Equality Act 2010 and Children and Families Act 2014 with regard to SEND.</p> <p>Fund projects that increase access to the physical environment from with DCS allocated resources and liaise with HQ DCS appropriately.</p> <p>Undertake any improvement projects in liaison with DCS HQ and DIO and adhere to building regulations and Health and Safety requirements.</p> |

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| | <p>Ensure curriculum needs are met by providing access to appropriate classroom facilities.</p> <p>Conduct risk assessments for school visits and ensure access for children with disability.</p> <p>Facilitate effective professional development for staff and governors.</p> <p>Keep parents/carers informed.</p> <p>Adhere to specific direction within this DCS's Accessibility Strategy.</p> |
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Increasing access to information

| HQ DCS will | MOD schools will |
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| Facilitate advice to schools and settings from DCS's Educational Psychology and Advisory Specialists about how best to support Service children and young people with accessing education. | <p>Include improvements that increase accessibility in the Accessibility Plan published on the school website.</p> <p>Ensure that a range of communication techniques and technology is used to increase access to information.</p> <p>Provide information for Service children and families in accessible formats where reasonably practicable.</p> <p>Monitor and review the skills and expertise of staff to support pupils with disability.</p> <p>Involve pupils and their families in the decision processes regarding accessibility of information.</p> |

Funding

23. All reasonable adjustments that involve Capital works for improved physical access must be submitted via school business managers to HQ MOD Schools Ops & Plans.

24. The cost of support for present or future disabled pupils, including resources needed by these pupils and staff training, should be met from school budgets. All MOD school budgets include an allocation for SEND that may be used for these purposes. Requests for additional funding should be made via school business managers to HQ MOD Schools Ops & Plans.

Monitoring

25. Progress on the implementation of School Accessibility Plans will be monitored and evaluated by MOD school SENDCOs.

26. Progress on the implementation of School Accessibility Plans and this Accessibility Strategy will be reported every two years (in Jun of even-numbered years) by the SENDCO to the Assistant Head DCS Specialist Services Services.

Annex A - Accessibility Plan

[School name]



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| Approved by: [Name] | Date: [Date] |
| Last reviewed on: [Date] | |
| Next review due by: [Date] | |

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Aims

Schools in Great Britain are required under the Equality Act 2010 to have an accessibility plan, and the MOD will mirror this requirement in overseas locations where it is reasonably practicable to do so. MOD Schools are therefore required to have an appropriate accessibility plan, the purpose of which is to:

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

Our school aims to treat all its pupils fairly and with respect. This involves providing access and opportunities for all pupils without discrimination of any kind.

Explain your school's principles and values which relate to equality and inclusion here.

The plan will be made available online on the school website, and paper copies are available upon request.

Our school is also committed to ensuring staff are trained in equality issues with reference to the Equality Act 2010, including understanding disability issues.

The school supports any available partnerships to develop and implement the plan.

Insert information relating to any local authority, trust or federation procedures here.

Our school's complaints procedure covers the accessibility plan. If you have any concerns relating to accessibility in school, this procedure sets out the process for raising these concerns.

We have included a range of stakeholders in the development of this accessibility plan, including *[include as appropriate: pupils, parents, staff and governors of the school]*.

Legislation and guidance

This document meets the requirements of [schedule 10 of the Equality Act 2010](#) and the Department for Education (DfE) [guidance for schools on the Equality Act 2010](#).

The Equality Act 2010 defines an individual as disabled if he or she has a physical or mental impairment that has a 'substantial' and 'long-term' adverse effect on his or her ability to undertake normal day to day activities.

Under the [Special Educational Needs and Disability \(SEND\) Code of Practice](#), 'long-term' is defined as 'a year or more' and 'substantial' is defined as 'more than minor or trivial'. The definition includes sensory impairments such as those affecting sight or hearing, and long-term health conditions such as asthma, diabetes, epilepsy and cancer.

Schools are required to make 'reasonable adjustments' for pupils with disabilities under the Equality Act 2010, to alleviate any substantial disadvantage that a disabled pupil faces in comparison with non-disabled pupils. This can include, for example, the provision of an auxiliary aid or adjustments to premises.

Action plan

This action plan sets out the aims of our accessibility plan in accordance with the Equality Act 2010.

The information set out in the column of 'current good practice' are examples to guide your own analysis of your current practice. They are not a thorough representation of good practice, and should be adapted to suit your school's context.

| Aim | Current good practice <i>Include established practice and practice under development</i> | Objectives <i>State short, medium and long-term objectives</i> | Actions to be taken | Person responsible | Date to complete actions by | Success criteria |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------|---------------------|--------------------|-----------------------------|------------------|
| Increase access to the curriculum for pupils with a disability | <p><i>Explain your school's approach here. Examples:</i></p> <p><i>Our school offers a differentiated curriculum for all pupils.</i></p> <p><i>We use resources tailored to the needs of pupils who require support to access the curriculum.</i></p> <p><i>Curriculum resources include examples of people with disabilities.</i></p> <p><i>Curriculum progress is tracked for all pupils, including those with a disability.</i></p> <p><i>Targets are set effectively and are appropriate for pupils with additional needs.</i></p> <p><i>The curriculum is reviewed to ensure it meets the needs of all pupils.</i></p> | | | | | |

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| <p>Improve and maintain access to the physical environment</p> | <p><i>Explain your school's approach here. Example:</i></p> <p><i>The environment is adapted to the needs of pupils as required.</i></p> <p><i>This includes:</i></p> <ul style="list-style-type: none"> • <i>Ramps</i> • <i>Elevators</i> • <i>Corridor width</i> • <i>Disabled parking bays</i> • <i>Disabled toilets and changing facilities</i> • <i>Library shelves at wheelchair-accessible height</i> | | | | | |
| <p>Improve the delivery of information to pupils with a disability</p> | <p><i>Explain your school's approach here. Example:</i></p> <p><i>Our school uses a range of communication methods to ensure information is accessible.</i></p> <p><i>This includes:</i></p> <ul style="list-style-type: none"> • <i>Internal signage</i> • <i>Large print resources</i> • <i>Pictorial or symbolic representations</i> | | | | | |

Monitoring arrangements

This document will be reviewed every **2** years, but may be reviewed and updated more frequently if necessary.

It will be approved by [the governing board/committee name/governor name/the head teacher].

Links with other policies

This accessibility plan is linked to the following policies and documents:

- Risk assessment policy;
- Health and safety policy;
- Equality information and objectives (public sector equality duty) statement for publication;
- Special educational needs (SEN) information report;
- Supporting pupils with medical conditions policy.

List any other linked policies that the school has here.

Accessibility audit

The table below contains some examples of features you might assess as part of an audit of the school's physical environment. It is not an exhaustive list, and should be adapted to suit your own context.

| Feature | Description | Actions to be taken | Person responsible | Date to complete actions by |
|-------------------------|-------------|---------------------|--------------------|-----------------------------|
| Number of storeys | | | | |
| Corridor access | | | | |
| Lifts | | | | |
| Parking bays | | | | |
| Entrances | | | | |
| Ramps | | | | |
| Toilets | | | | |
| Reception area | | | | |
| Internal signage | | | | |
| Emergency escape routes | | | | |

Annex B - Reasonable Adjustments

Increasing Access to the Curriculum

1. This strand of the planning duty is intended to improve access for disabled pupils to a full, broad and balanced curriculum, including the wider curriculum of the school, for example, participation in after school clubs, leisure, sporting and cultural activities and school visits.
2. In developing plans for increasing access to the curriculum, MOD schools will need to consider issues such as:
 - a. Curriculum and lesson planning to enable the effective inclusion of pupils with a diverse range of learning needs;
 - b. Classroom organisation;
 - c. Timetabling;
 - d. Pupil grouping arrangements and use of peer support;
 - e. Deployment of learning support;
 - f. Training of teachers and support staff;
 - g. Allocation of time to ensure that SENDCOs and subject or phase leaders have sufficient opportunity to address curricular access issues.
3. HQ DCS will provide support to teachers and support staff in planning for increased curriculum access by:
 - a. Securing staff training, including training for learning support assistants and other support staff;
 - b. Promoting collaboration and sharing of good practice;
 - c. Supporting curriculum development;
 - d. Ensuring that schools are aware of sources of support which can be provided by SENDCOs, advisory teachers, educational psychologists and social workers, and staff from other agencies and organisations;
 - e. Establishing an inclusion page on the MOD School website to enable access to shareable resources;
 - f. Championing a SENDCO Community Forum to enable the exchange of good practice.

Improving Access to the Physical Environment

4. This strand of the planning duty covers improvements to the physical environment of the school and the provision of physical aids to access education.
5. The physical environment of the school includes steps, stairways, kerbs, exterior surfaces and paving, parking areas, building entrances and exits (including emergency escape routes), internal and external doors, gates, toilets and washing facilities, lighting, ventilation, lifts, floor coverings, signs and furniture.
6. Physical aids to access education include ramps, handrails, lifts, widened doorways, adapted toilets and washing facilities, lighting, blinds, and improvements to the acoustic environment. They also include equipment such as ICT equipment, enlarged computer screens and keyboards, concept keyboards, radio aids and loop systems, specialist desks and chairs, and portable aids for children with motor coordination and poor hand/eye skills.
7. All new MOD schools and major extensions to MOD schools will meet the requirements of the Education (School Premises) Regulations.
8. Subject to the availability of funding, when major extension or refurbishment projects are commissioned at existing schools, HQ DCS will take the opportunity to bring the building, or the remainder of the building, up to the required standards for disabled access.

Increasing Access to Information

9. This part of the duty covers planning to make written information normally provided by the school to its pupils, accessible for disabled pupils. Written information might include worksheets, reading books, text books, timetables, and information about school events. The school might consider providing the information in clearer or alternative formats (e.g. enlarged text, visual symbols), or providing the information orally.
10. For pupils with visual impairment, strategies to improve the accessibility of written information include:
 - a. Enlargement of text;
 - b. Clear, well-spaced black print on white matt paper;
 - c. Correct seating in relation to the board, whiteboard etc. avoiding sources of glare;
 - d. Verbal explanation when demonstrating to the class; reading out what is written on the board;
 - e. Avoiding the sharing of texts or computers unless doing so is a priority for social reasons;
 - f. Enlarging the size of text and the mouse pointer on a computer screen;
 - g. "Non-optical" low vision aids e.g. reading stands, task lighting;
 - h. "Optical" low vision aids e.g. magnifiers, CCTV.

11. It is unlikely that pupils who need Braille texts can be supported in MOD schools.
12. For pupils with dyslexia, strategies to improve the accessibility of written information include:
 - a. Coloured overlays, line guides, tracking guides;
 - b. Peer, adult, or taped support for texts;
 - c. Visual cues to aid recognition;
 - d. Presenting text as clearly as possible; highlighting of main points; use of bullet points.
13. Difficulty in accessing written information is not restricted to pupils with visual impairment or dyslexia. For example, children with attention deficit hyperactivity disorder (ADHD) may find it difficult to access written information because of their distractibility. Adaptations might include classroom placement and management strategies to reduce the possibility of distraction.
14. For pupils who have difficulty in accessing written information, teachers are required to consider whether special arrangements need to be put in place for Key Stage tests and or public examinations in line with Standards and Testing Agency (STA) guidance.