



**Period Covered: September 2021 – February 2024**

See Appendix for the 1 to 3 year schedule and timescales.

**Principles**

Rochester Independent College (RIC) entirely supports the spirit and aims of the Equality Act 2010, the Special Educational Needs and Disability Act 2001 (SENDA) and the Special Educational Needs and Disability Code of Practice (DfE 2015). We adhere to the guidelines set out in the Regulatory Requirements of the Independent Schools Inspectorate (ISI April 2015).

We fully take on board our responsibilities under the non-discrimination duties which apply to all Colleges and educational establishments. We are committed to ensure that we do not treat an existing or prospective disabled student less favourably than others due to their disability.

We aim to make sure that this principle applies in the areas of admissions, exclusions, the provision of education and all other related services that we offer our students. We will seek to ensure that this principle is applied whenever relevant individual decisions have to be made or whole-College policies reviewed in any of the aforementioned areas.

**Disability Definitions**

The Equality Act 2010 retains the previous definition of disability: 'A physical or mental impairment which has substantial and long term adverse impact on a person's ability to carry out normal everyday activities'. This has some overlap with the definition of 'special educational needs' in the Children and Families Act 2014 (which includes pupils with significantly greater difficulty in learning than the majority of children of his/her age, or a disability which means that a pupil cannot make full use of the general educational facilities provided for pupils of their age in mainstream state schools) but not all pupils are disabled by their SEN and vice versa.

**Disability Discrimination Concepts**

Within the Equality Act 2010 there are three main concepts:

- direct discrimination - discrimination that occurs because of the 'protected characteristic' of disability
- discrimination arising from disability - where a disabled student or member of staff has been treated unfavourably because of something connected with their disability

- indirect discrimination - where the College applies a 'provision criterion or practice' in the same way for all students/staff but which has the effect of putting disabled students/staff at a particular disadvantage.

In both latter cases there is a defence of justification.

In the case of a student, having a disability does not automatically mean that *for that reason alone* the student concerned has 'special educational needs' under the terms of the SEN and Disability Code of Practice 2015. Each student with a disability will therefore require separate consideration and treatment.

**Unlawful discrimination**

It is unlawful to treat a disabled person less favourably for a reason related to his or her disability than a person who does not have a disability, without justification. It is also unlawful to fail, without justification, to:

- make 'reasonable adjustments' to admission and curriculum arrangements
- in relation to education and associated services, to ensure that disabled students are not disadvantaged in comparison with students who are not disabled

**Less favourable treatment**

For 'less favourable treatment' to lead to unlawful discrimination it must be shown to be:

- for a reason related to the person's disability
- less favourable treatment than the treatment given to a person without disability
- not justified

**Justification**

Less favourable treatment can be justified if the reasons are material to the circumstances and substantial. In addition, in the case of a student, non-admission to College can be justified if it is the result of a 'permitted form of selection'. Selective Colleges can continue to select as long as the criteria are not such as to exclude only students with disabilities.

**Accessibility - Context and Plan**

This plan sets out the proposals of the Principal of the school to increase access to education for disabled pupils in the three areas which relates to the following ISI Regulatory Standards on special educational needs and disability:

<b>ISI Regulatory Standard</b>	<b>Description</b>
Schedule 10 3. (2)(a)	Increasing the extent to which disabled pupils can participate in the school's curriculum;

3. 2(b)	Improving the physical environment of the school for the purposes 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.
3. 2(c)	Improving the delivery to disabled pupils of information which is readily accessible to pupils who are not disabled.

It is a requirement that the school's accessibility plan is resourced, implemented, reviewed and revised as necessary and reported on annually to the Governing Body.

### **The School's Context**

We are an independent day and boarding school for boys and girls with an age range 11yrs to 19+. The school comprises several buildings covering a relatively large site. The buildings on the site vary in size, age and configuration. Many of our school buildings are Grade II listed meaning that planning laws surrounding alterations are prohibitive.

### **Admission to the School**

Rochester Independent College adopts an inclusive policy and students with Special Educational Needs and physical disabilities are offered the opportunity to join the School if they satisfy the School's selection procedures. All due care is taken to ensure that any applicant who may need special exam access arrangements is considered in advance by the SENCO on the presentation of suitable and up to date documentation by the candidate sitting the exam. Rochester Independent College requires parents to inform the School in respect of the disability or special requirements of a prospective pupil when they apply to the School

### **Access around the site**

Access will continue to be improved in line with the action plan. Rochester Independent College is situated on a steeply sloping site with many of its buildings subject to strict planning regulations, meaning that physical adjustments to the site and buildings is difficult. At major events staff are available to assist if necessary. Rooming of the timetable may be adjusted on a temporary or permanent basis to take account of the needs of an individual with a specific disability. Needs will be assessed on a case by case basis and all reasonable steps taken to improve access. The College regularly adapts to individual cases, for example, access requirements for a pupil with cerebral palsy. Paths around the College site have been improved to improve accessibility and reduce potential trips and slips.

## Learning Support

The SENCOs Leighton Bright and Ian Duxbury are responsible for ensuring that sufficient help and support is in place for students with Special Educational Needs. Due to the size of the College there is not a Learning Support Department, however the SENCOs ensures that all teaching staff are aware of and trained in strategies to effectively differentiate lessons to enable learning effectively. The full SEND Policy is available on the School website.

## EAL

The EAL Coordinator is Robert Simpson.

All international students whose first language is not English are screened on entry to Rochester Independent College to determine their level of competence in English.

An EAL register is drawn up and made available to all staff so colleagues are well informed about the requirements of the students in their class.

Where assessed as necessary, EAL students are provided with English as a Foreign Language (EFL) support. The College currently employs 2 qualified EFL teachers who take responsibility for this provision. The aim in all cases is to increase the extent to which EAL students can participate in the School's curriculum. EAL students are monitored and assessed on a regular basis and their provision adapted as a result of this process

## Provision of information

We provide written information to pupils with disabilities in ways that are user-friendly and fully support the pupils in their learning experience.

Appendix 1 –Accessibility Action Plan

Reviewed by the SENCO and Principal: Sep 2022

Next review: Sep 2023

Created/Updated	Author	Approved by	Date
February 2018	LB	AB	February 2018
September 2021	LB	AB	September 2021
September 2022	LB	AB	September 2022

Appendix 1: Accessibility Action Plan 2021 - 2024

<b>Part of Standard</b>	<b>Area of Focus</b>	<b>I/C</b>	<b>Detail</b>	<b>Evidence of Success</b>	<b>Timescale</b>
3(2) A	SEN Provision	LB	Provide induction SEN training for all new staff.	All new staff to complete SEN knowledge audit. Followed by targeted SEN training.	Audits completed by Oct 2022. Targeted training by Dec 2022.
3(2) A	SEN Provision	LB	Better prepare staff for students with specific needs, particularly Sixth Form teachers.	Lesson observations and student feedback to confirm that SEN being considered during lessons	Ongoing
3(2) A	SEN Provision	LB	All relevant SEN data to be shared with relevant staff.	All relevant SEN data to be entered on a shared drive.	Ongoing
3(2) A	EAL Provision	EC	To more closely track and monitor the progress of EAL students.	EAL student progress to be readily available for SMT.	Sept 2021
3(2) A	EAL Provision	HS	Provide more detailed training for staff with regards to teaching EAL students.	All staff to attend training.	Dec 2021
3(2) B	Physical Environment	DM	Improve physical access to art block.	Access to art block for wheelchairs by installing wheelchair ramps.	Sept 2021
3(2) B	Physical Environment	DM	Review and provide recommendation for accessibility of boarding accommodation for disabled pupils.	Boarding provision appropriate for students with some auditory or mobility issues.	Sept 2025
3(2) B	Physical Environment	DM	Improve paths on the College site to minimize level changes and reduce risk of trips and slips	New resin paths laid in significant areas in the garden	Sept 2022
3(2) C	Provision of Information	LB	Widespread use of Google Classrooms to enable all students to better	All students to have log-ins and be able to regularly access this information.	September 2021

			access information with regards to homework.		
3(2) C	Provision of Information	JC/ AB	Review website accessibility options to include readability, inverted colours, large text and system font, audio options and translated sections.	Fully accessible website in place - new website in planning.	New website completed by December 2024