

# Hull City Accessibility Strategy 2020-2023



## **Vision**

Hull City Council is committed to working with schools and multi academy trusts, through the learning partnership, to continually review key services which are available to safeguard learners and support those with Special Educational Needs and/or Disability (SEND). We aspire that by following a graduated approach we ensure that learning is accessible and that provision is targeted appropriately to address local needs.

By working together with families and communities we want all children and young people aged 0 – 25 with SEND to be safe, do well in education, make friends and build strong, lasting relationships within their local community. Through high quality provision of support learners develop their independence; knowing how to keep themselves safe and make healthy lifestyle choices, in preparation to succeed in society. As young adults we want each young person to have the necessary skills and qualifications that will give them the confidence to be ambitious and to achieve their aspirations.

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## Introduction

This accessibility strategy sets out the approach that Hull City Council is taking to increase access to education for disabled children and young people, so that they can benefit from educational provision to the same extent that children without disabilities can.

All local authorities must have an accessibility strategy for the schools it is responsible for, for example local authority maintained schools. This is a requirement of law, the Equality Act 2010.

Accessibility strategies don't apply to academies or free schools. However, all schools, including academies and free schools, must have an accessibility plan which is based upon the same principles as an accessibility strategy.

An accessibility strategy explains how over time, the local authority will support the schools it is responsible for in order to:

- increase access to the curriculum for disabled pupils
- improve the physical environment of schools to increase access for disabled pupils
- make written information more accessible to disabled pupils by providing information in a range of different ways

Disability in its broadest sense covers:

- physical impairments
- learning difficulties
- sensory impairments
- mental impairments

Under the Equality Act, disability is a protected characteristic. A person has a disability 'if they have a physical or mental impairment that has a substantial and long term adverse effect on their ability to carry out normal day to day activities'.

"Substantial" means more than trivial

"Adverse" means unfavourable or injurious

"Long term" means if it lasts, or is likely to last 12 months or more.

## Legislation

The Council is required to have an accessibility strategy in which it promotes better access for disabled pupils at school and its local community, under the planning duty in the Equality Act 2010, Part 6, Section 88 (Schedule 10):

<http://www.legislation.gov.uk/ukpga/2010/15/schedule/10>

Unlike the rest of the Equality Act which has a focus on equal treatment, the sections relating to disability are different and recognise that a person with a disability may have to be treated more favourably than someone who does not, in order to avoid substantial disadvantage. Substantial is anything more than minor or trivial

## Reasonable Adjustments

Taking reasonable steps to avoid substantial disadvantage is often known as the 'reasonable adjustments' duty. All providers must adhere to this duty. When deciding if a reasonable adjustment is necessary, schools need to consider potential impact on disabled pupils in terms of time and effort, inconvenience, indignity and discomfort, loss of opportunity and diminished progress.

It means where a disabled person is at a substantial disadvantage in comparison with people who are not disabled they should take reasonable steps to remove the disadvantage by:

- Changing provisions, criteria or practices
- Altering, removing or providing a reasonable alternative means of avoiding physical features

And

- Providing auxiliary aids

Schools don't have to consider physical features as part of their reasonable adjustments duty. Instead they have an additional duty to plan better access for disabled pupils generally through their accessibility plan. The law on reasonable adjustments is anticipatory; it requires settings to consider the needs of potential disabled pupils as well as those currently attending the setting.

These planning duties therefore do NOT apply to Further Education, Higher Education or Early Years settings (unless constituted as a school). For them, the requirement to remove physical barriers is contained within the reasonable adjustments duty.

### **Failure to make a reasonable adjustment is a form of discrimination under the Equality Act.**

**Direct discrimination** is the act of treating someone less favourably than someone else has been treated (or would be treated) because the person belongs to one of the protected groups.

**Indirect discrimination** describes situations which occur when an organisation makes a decision, or puts in place a particular policy, practice or procedure, which appears to treat everyone equally, but which in practice leads to people from a particular protected group being treated less favourably than others.

## **The General Equality Duty**

The Equality Act (2010) places a general duty on all public sector organisations to have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act.
- Advance equality of opportunity between people who share a protected characteristic and those who do not.
- Foster good relations between people who share a protected characteristic and those who do not.

The Act explains that having due regard for advancing equality involves:

- Removing or minimising disadvantages suffered by people due to their protected characteristics.
- Taking steps to meet the needs of people from protected groups where these are different from the needs of other people.
- Encouraging people from protected groups to participate in public life or in other activities where their participation is disproportionately low.

Protected characteristics are qualities shared by everybody, they are age, disability, gender reassignment, marriage or civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

## **The Specific Duty**

In addition to the General Duty, there is a Specific Duty for schools to demonstrate how they are meeting the General Duty. The main requirement is for schools to prepare and publish information and from that information publish equality objectives. In effect, the General Duty sets out what schools do, with the Specific Duty setting out how schools have to do it and what they need to record as evidence of what they have done.

## **Duties on Schools**

All schools should have due regard to this Accessibility Strategy and use it to inform their Accessibility Plan that shows how, over time, access to education for disabled pupils will be improved. Schools should publish their Accessibility Plans on the school website with a clear link between the Accessibility Plan and the SEND Information Report.

Hard copies of the Accessibility Plan must be provided on request.

## **Local Context**

Kingston Upon Hull (often shortened to Hull) is a port city which lies upon the River Hull on the northern bank of the Humber Estuary. Covering an area of approximately 28 square miles, the latest Office for National Statistics (ONS) Mid-Year Population Estimate (2019) for the city is 259,778 people.

The city has a total of 97 educational establishments including 71 Primary Schools, 13 Secondary Schools, 6 Special Schools and 6 Pupil Referral Units, providing for a school population of approximately 42 000. 18.4% of the city's school population have been identified as requiring SEND support with 3.7% of the school population with an Education Health and Care Plan (EHCP).

- In Hull we support 1554 pupils with an EHCP\*
- Our 6 special schools have 694 pupils on roll\*
- Our 6 Pupil Referral Units have 86 pupils with an EHCP on roll\*
- 7061 learners with Special Education Needs and Disability (SEND) are supported in mainstream settings\*

\*Jan 2020 Census Data

## **Strategy Aims**

Through this strategy, Hull City Council will focus on three keys aims:

- Increase access to the curriculum for disabled learners
- Improve the physical environment of schools to increase access for disabled learners
- Improve the delivery of information to disabled learners which is readily accessible to learners who are not disabled

Whilst the accessibility strategy relates to maintained schools, many of the support arrangements made by the local authority will also benefit disabled pupils attending academies and free schools within Hull City.

## Curriculum Accessibility

### Aim: Increase access to the curriculum for disabled learners

Ensuring access to the curriculum is vital in providing equal opportunities to children and young people with SEND. Schools need to consider how to improve the accessibility of the curriculum, covering teaching and learning, trips and visits, after school activities and extended school activities.

Schools are responsible for providing a broad and balanced curriculum for all pupils and play a key role in planning to increase access to the curriculum for all pupils. All schools must “use their best endeavours” to provide “high quality teaching that is differentiated and personalised” and which should “meet the individual needs of the majority of children and young people.” (SEN Code of Practice 1.24).

The council and its partners provide a range of services to support schools in making inclusive and accessible provision. Details are available in the Local Offer [hull.mylocaloffer.org/](http://hull.mylocaloffer.org/)

Hull City Council, on behalf of schools, commission a mixture of both internal and external providers, to deliver services to settings to support learners to access their education. These services are detailed below.

- Integrated Physical and Sensory Service (IPaSS) – Supporting Learners with Physical Disabilities, Hearing Impairments or Vision Impairments
- The Language Unit – Supporting learners with Speech, Language and Communication Difficulties
- Hull City Psychological Service – Educational Psychologist Service supporting schools through termly Psychological Consultation Meetings and a wider traded service
- Northcott Outreach Service – Supporting learners with autism aged 4 – 16
- Ganton and Tweendykes Outreach Service – Supporting learners with severe learning difficulties aged 4 -16
- Whitehouse – Supporting learners with social, emotional, mental health difficulties at primary age, up to and including transition into year 7
- Sullivan Centre – Supporting learners with significant health (inclusive of physical and mental health) needs aged 5-16

Specialist Provision is also available through:

Enhanced Resource Bases at:

- Bricknell Primary School
- Christopher Pickering Primary School
- Spring Cottage Primary School
- Wansbeck Primary School
- Ings Primary School (from Jan 2021)
- Broadacre Primary School (from 2021)
- Kelvin Hall Secondary School



- Sirius West Secondary School

And the City's Special Schools:

- Ganton School
- Tweendykes School
- Frederick Holmes School
- Northcott School
- Oakfield School
- Bridgeview School

In some circumstances, NHS services also support access to the curriculum for individual pupils, including Speech and Language Therapy, Occupational Therapy (e.g. specialist seating assessment), Physiotherapy and the Emotional Health and Well Being Service.

Where it is thought a child or young person may require additional equipment to enable their access to the curriculum an assessment of need may be carried out by either IPaSS and/or the local CCG community therapy service. Any recommended equipment will then be procured and provided through the Education Equipment Panel process. Currently schools are required to fund equipment up to the cost of £500.

Services are also available which are not directly Local Authority managed – schools are able to use their SEN budget to purchase as required. These include a range of Alternative Provision Settings:

- Whitehouse
- Boulevard Centre
- Sullivan Centre
- Aspire
- Rise Academy
- Compass Academy

Advice on sources of other learning support is available on the Local Offer.

## Environment Accessibility

### **Aim 2: Improve the physical environment of schools to increase access for disabled learners**

Reasonable adjustments may be needed to ensure equality of access to the environment, including the creation of safe spaces, calming areas, and individual workstations.

Support services from health, social care and education services such as IPaSS, Occupational Therapy and Physiotherapy, are available to advise educational settings about suitable and reasonable adaptations to the inside and outside environment to help include pupils with SEND.

For learner specific environmental adaptations, an assessment of need will be carried out by IPaSS. A report will be provided outlining the adaptations recommended to aid accessibility. This may include information on obstructions, acoustic considerations or lighting matters dependent on the child or young person's needs. Provision of recommended adaptations should then be progressed by the setting.

Additionally for learners who have physical disabilities and who may require support for moving and handling. Settings can make a referral to the IPaSS physical disability team who are able to assess the individual's needs, producing a report and making appropriate recommendations. Where pupil specific moving and handling needs are identified, safe hoisting and safe use of equipment instruction is provided. The moving and handling training course can also be accessed from IPaSS as a traded service. The physical disability team from within IPaSS are also able to provide support to educational settings to write care plans and Personal Emergency Evacuation Plans (PEEPs).

### **Transport**

In line with the Department for Education, Home to school travel and transport statutory guidance (2014) Hull City Council have agreed a home to school transport policy, which can be found [here](#). This policy outlines the eligibility criteria for those who are entitled to access assisted travel.

This policy is written to support the attendance of children and young people with special educational needs and disabilities from 0 – 25 years at schools and colleges through the provision of transport.

Further information relating to home to school transport can be found on the Local Offer [here](#).

In addition to home to school transport an independent travel training programme has been devised to support young people with SEND or additional needs to obtain the skills needed to gain full independence when travelling on public transport. The young person will be accompanied, supported and assessed on a bus or train route by the Independent Travel Trainer. Ideally, the assessed journey in question will be the young

person's journey from home to their place of education or training and the return journey.

This will therefore enable the young person to have full independence over their travel 5 days a week, as well as giving them the skills to travel independently for life.

Further details on independent travel training can be found [here](#).

## **Information Accessibility**

### **Aim 3: Improve the delivery of information to disabled learners which is readily accessible to learners who are not disabled**

This aim focuses on the development of planning to make information (normally provided by the school to its pupils) accessible to disabled pupils. Information which is produced should take account of pupils disabilities, pupils and parents preferred formats and be made available within a reasonable timeframe.

Hull City Council has a clear corporate writing style which outlines suitable fonts, layout and formatting which are intended to support the accessibility of written information provided by the Local Authority. Hull City Council also provides a service for documents to be published in "easy read" format as required.

The Integrated Physical and Sensory Service (IPaSS) offers specialist advice, training and support to schools to ensure that information is accessible for learners with a sensory impairment.

The Local Offer Website has supportive features which allow the formatting of the website to be changed to support accessibility as well as the support of BrowseAloud which supports access for those with difficulties such as dyslexia, visual impairments or English as an additional language.

For parents of SEND Pupils they should be made aware by schools of the local offer website, as well as KIDS - Hull Special Educational Needs and Disabilities Information, Advice and Support Service (SENDIASS) who are available to support parents, carers and young people with SEND. SENDIASS also provide advocacy and encourage partnership working.

## Financial Arrangements

Some disabled children will require individualised equipment to enable access to the curriculum: smaller items such as pencil grips and writing slopes, and more specialist equipment such as height adjustable furniture, toilet seats and supportive seating. Such equipment will be provided by settings as part of the reasonable adjustments duty (auxiliary aids).

For learners with an Education Health and Care Plan funding to support their needs is provided through a combination of funding already allocated to the school through Element 1 (Age Weighted Pupil Unit) and Element 2 (Schools Notional SEND Funding) funding. Where a child has an EHCP and their provision exceeds £10 000 (total of element 1 and 2 funding) the SEND Assessment and Review Team will allocate an additional amount of Element 3 (Top Up) Funding. The Element 3 funding is allocated based on a banding system which is split into 4 levels:

- High
- Severe
- Intensive
- Intensive Plus

A band of funding is allocated dependent on the learners' needs and provision being provided.

Where equipment is recommended and procured through the education equipment panel, currently the council expects mainstream schools to fund items to support accessibility up to £500. Special schools are provided with budget allocations to cover the costs of any equipment that is necessary for a pupil's access to school. As equipment is purchased for the use of individual pupils it is the council's expectation that any equipment which has been purchased by a setting, will follow the pupil throughout their school life including such times as when a pupil transitions between school settings.

In those instances where a mainstream school has been required to fund equipment to the value of £500 and the pupil for whom the equipment was purchased transitions to another school, it is anticipated that negotiation about payment should be held between the transitioning and receiving schools. There is specific equipment that will require adaptation, for example as a child grows, which schools will need to purchase when appropriate. It is also important to note that in some cases adaptation to existing equipment may not be possible and in these circumstances whole items will need to be purchased again.

## Evaluation and Review

This Strategy will cover the period 2020-2023 and will be regularly reviewed by the contributors and revised/updated as required within this time period.

The overall responsibility for the evaluation and review rests with Hull City Council, with specific oversight from SEND Strategic Board.

Whole School SEND Review visits will include a question regarding the school's accessibility policy or plan and their implementation of the Equality Act 2010.

This strategy will be published on the Hull City Local Offer.

## Key references

The Equality Act

<https://www.legislation.gov.uk/ukpga/2010/15/contents>

SEND Code of Practice

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/398815/SEND Code of Practice January 2015.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/398815/SEND_Code_of_Practice_January_2015.pdf)

JCQ Exam Access Arrangements

<https://www.jcq.org.uk/exams-office/access-arrangements-and-special-consideration/regulations-and-guidance/>

SEND Strategy

<http://www.hull.gov.uk/sites/hull/files/media/SEND%20Strategy.pdf>

Home to School Travel and Transport Guidance

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/575323/Home to school travel and transport guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/575323/Home_to_school_travel_and_transport_guidance.pdf)

Hull City Council Transport Policy (currently being reviewed)

<http://hull.mylocaloffer.org/s4s/WhereILive/Council?pagelid=4428>

## Appendix 1 – Action Plan

| Development Area  | Action Steps  | Monitoring and Review |
|---|---|-----------------------|
| <b>Aim 1: Increase access to the curriculum for disabled learners</b> | Provide support to school leaders, including SENCOs, in relation to SEND Policies, Information Reports and Accessibility Plans  |                       |
|   | Provide opportunities through LA SENCO Forums for SENCOs to regularly meet, share good practice and keep up to date with new developments   |                       |
|   | Provide opportunities for governor training in relation to increasing access to the curriculum  |                       |
|   | Continue to encourage liaison between early years settings and schools to ensure good transition  |                       |
|   | Support the Learning Partnership in the development and implementation of transition guidance between educational settings  |                       |
|   | Develop greater guidance in collaboration with schools on the implementation of the graduated approach  |                       |
|   | Working with Children and Young People, develop High Quality Teaching Guidance for high frequency areas of need   |                       |
|   | IPaSS Service will continue to support schools to understand how to adapt lessons to be accessible for learners with a sensory impairment or physical disability  |                       |
|   | Working alongside the Learning Partnership carry out the Whole School SEND Review Process for all (mainstream) Hull City Schools by Summer 2023 to identify strengths of practice and areas for development |                       |

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|  | Development of the ONEHull Offer to support workforce development and provide CPD opportunities which align with the existing training programmes already in place |  |
|  | Develop an LA policy and associated guidance for all schools about supporting pupils with medical conditions   |  |
| <b>Aim 2: Improve the physical environment of schools to increase access for disabled learners</b> | Plan new buildings and significant extensions or adaptations that comply with accessibility requirement  |  |
|  | Ensure that the fair access panel work with the School Admissions and/or SEN Team to assist with issues regarding individual placements                            |  |
|  | Work with all settings in the city to carry out an accessibility facilities audit to support parents and learners in decision making at school transition points   |  |
|  | Continue to review existing provision of buildings other than schools that the local authority is responsible for, which support learning. E.g The Albemarle       |  |
|  | IPaSS to continue to offer advice to settings on how to improve acoustics in the environment for Hearing Impaired Learners   |  |
|  | Develop a Schools Access Initiative  |  |
|  | Raise awareness with Academies of the Conditions Improvement Fund  |  |
|  | IPaSS to continue to offer Independent Travel Training for those open to IPaSS   |  |
|  | Widen the offer for Independent Travel Training by offering train the trainer training.  |  |

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| <b>Aim 3: Improve the delivery of information to disabled learners which is readily accessible to learners who are not disabled</b> | Offer governor training that covers the requirements of an accessibility plan and the specific need to increase access to information   |  |
|   | Increase the range of information available for families and young people in relation to the SEND Statutory Assessment process and Education Health and Care Plans.                                       |  |
|   | Provide information to pupils and their families in accessible formats whenever needed  |  |
|   | Provide advice to Settings from IPaSS about how best to support children and young people with a hearing or vision impairment to access information   |  |
|   | Provide guidance to schools on the production of SEND Information Reports (or supplementary information) which are accessible to parents and learners   |  |
|   | Ensure education, health and care (EHC) plans are specific about the provision required to make information accessible for individual pupils with a disability. Ensure EHCPs are provided in this format. |  |
|   | Ensure any new buildings or extensions to building are have appropriate signage in line with accessibility and health and safety requirements   |  |