

**DISABILITY AND ACCESSIBILITY**

2024-27

**Period Covered: September 2024 – September 2027**

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.

This policy has been drawn up taking into account pupils' disabilities and the preferences expressed either by them, their parents/carers or via recommendations within specialist documentation. This plan is kept under review by the Governing Body and revised when necessary. The Governing Body are supportive of the College in ensuring that adequate resources, both financial and physical, are provided in order to deliver accessibility initiatives.



## **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 of 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. 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 ensure that all teaching staff are aware of and trained in strategies to effectively differentiate lessons to enable learning effectively. There is one Teaching Assistant employed by the College who is directed by the SENCOs to support learners where needed. The full SEND Policy is available on the School website.



### **Examination Access Arrangements**

The assessment and provision of Examination Access Arrangements are overseen by the College SENCOs. Whilst not an exhaustive list, in recent years the provision made has included:

- 25 - 50% Additional Time
- Readers and Scribes
- Alternative Rooming Arrangements
- Word processors (with and without spellcheck enabled)
- Noise cancelling headphones
- Coloured paper
- Ergonomic seating
- Specific positioning in Exam Hall
- Provision of white noise/music via school devices
- Prompters
- Computer Readers
- Translation Dictionaries
- Supervised rest breaks

We are committed to ensuring that students do not face disadvantages as results of disability. We work with previous educational settings and professionals when finding the best solutions to adequately and compliantly provide access arrangements required in line with the statutory requirements of the Joint Council for Qualifications (JCQ) and Cambridge International Education (CIE).

### **EAL**

The EAL Coordinator is Robert Simpson.

All international students whose first language is not English are screened on entry predominantly via a face to face (in person or online) interview. If deemed necessary throughout the admissions process, students may be assessed via the Cambridge English Placement Test (CEPT). Students may



be tested further on entry to the College and will participate in regular in-class assessments as and when required. These measures ensure that the level of English Language competence is established. 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. This support will be tailored based on the assessed level and can include 1 - 1 support where necessary. The College employs 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.

Students with EAL are able to use translation tools using College Chromebooks or via personal devices when necessary at the discretion of the teaching staff. Students are provided with translation dictionaries when required, including in formal examinations in accordance with the JCQ Regulations 2025/26.

### **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 2025

Next review: Mar 2026

<b>Created/Updated</b>	<b>Author</b>	<b>Approved by</b>	<b>Date</b>
February 2018	LB	AB	February 2018
September 2021	LB	AB	September 2021
September 2022	LB	AB	September 2022
September 2023	LB	AB	September 2023
September 2024	LB	AB	September 2024
September 2025	LB	AB	September 2025



Appendix 1: Accessibility Action Plan 2025 - 2027

Part of Standard	Area of Focus	I/C	Detail	Evidence of Success	Timescale
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 with links to documentation.	Ongoing
3(2) A	SEN Provision	LB	Targeted Maths interventions to run for identified students	Maths focussed TA in place	Ongoing
3(2) A	SEN Provision	LB	Physical assistant for student with limited mobility	Teaching Assistant's timetable adjusted to facilitate this	Ongoing
3(2) A	SEN Provision	LB	All staff to attend SEN training sessions	Two SEN training sessions have been delivered so far	Ongoing
3(2) A	SEN Provision	LB	Creation of dedicated SEN area across rooms 8, 9 and 10. To include Sensory Pod	Plans to be drawn up and logistics arranged in advance of Summer '26	September 2027
3(2) A	EAL Provision	BS	Provide more detailed training for staff with regards to teaching EAL students.	All staff to attend EAL training.	Mar 2026
3(2) A	EAL Provision	BS	Chinese speaking Art assistant employed to assist growth in Chinese speaking art students.	Member of staff in post.	Ongoing
3(2) B	Physical Environment	DM	Improve physical access to Music block.	Access to the Music block for wheelchairs by installing movable wheelchair ramps. PEEPs to include this detail and also the requirement to have help with doors into and around the buildings.	April 2026
3(2) B	Physical Environment	DM	Improve handrails on all steps along garden paths	Replace rope with solid handrails on one side of each set of steps on the garden path around the maths shed and stage area	Sept 2025



3(2) B	Physical Environment	DM	Review and provide recommendations for accessibility of boarding accommodation for disabled pupils.	Boarding provision appropriate for students with some auditory or mobility issues. From September 2024 two accessible rooms on the Northbank campus.	Sep 2025
3(2) B	Physical Environment	LB	Timetables adjusted to allow easier access for students with mobility issues.	Lessons relocated to more accessible classrooms when required. Students with mobility issues able to use routes typically not accessible for students.	Ongoing
3. 2(c)	Improving the delivery of information	JC	Website accessibility is regularly reviewed by Varn, our web agency.		Ongoing