

POLICY – Accessibility

Education Universal

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Policy Approver	Jo Dunn, Compliance, Regulation and Quality Director
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Staff groups affected	All Education

Monitoring and Review

This policy will be monitored on an ongoing basis through the service's established governance and quality assurance systems. Responsibility for ensuring that the policy remains compliant with legislation and regulatory frameworks sits with the Proprietor Representative and Regional Lead.

A formal review of this policy will be undertaken no later than three years from the date of approval, or sooner if changes in legislation, regulatory guidance, or operational requirements necessitate it.

The Head of Policy will support this process by identifying relevant changes in legislation, regulation, national standards and emerging best practice. The Head of Policy will also incorporate learning from inspections, audits and practice developments into future revisions whilst overseeing all proposed amendments to the universal content to ensure accuracy, consistency and compliance.

Terminology

Our aim is to use consistent terminology throughout this policy and all supporting documentation as follows:

Term	Definition
‘Establishment’ or ‘Site’	A generic term referring to the school/college owned by CareTech.
Learner	Any child or young person under the age of 18, or young adult over 18 who receives education.
Service Head	The senior person with overall responsibility for the school/college.
Tutor/Teacher	Members of staff who have teaching responsibility for learners at the school/college.
Parent/Carer	Parent or person with parental responsibility.
Regulatory Authority	The independent regulatory body responsible for inspecting and regulating services (e.g., Ofsted, Estyn, Education Scotland).
Social Worker	The worker allocated to the individual learner; if none is allocated, the Duty Social Worker or Team Manager is responsible.
Placing Authority	The local authority/agency responsible for placing the learner or commissioning the service.
Local Authority	The local authority for the establishment’s location.
Staff	All staff working at the location, including employed staff, students on placement, contractors, agency staff, volunteers and proprietors.

1. Local School/College Profile

Cambian Whinfell School offers up to 52-weeks residential placements and day places for local students.

The School offers **OUTSTANDING** care and education for boys and young men aged 7-19. Students often arrive after difficult education and domestic experiences and are potentially lacking of confidence. Whinfell School provides stability, consistency and a sense of belonging within a safe and nurturing environment, whilst supporting students academic, social and emotional development to prepare them for the future.

Our young people have often experienced significant disruption to their schooling in the past and may come to us from multiple placement breakdowns. They may also present a risk to themselves or others due to high levels of challenging behaviour or deficits in personal development. Typically they are very disengaged, isolated and have little self-belief. By prioritising these deficits we create the conditions for young people to re-engage in education and achieve their full potential.

We believe that it is not enough to just provide a safe and happy school experience. We prioritise **connections before corrections**, recognising that strong, trusting relationships form the foundation for genuine growth and learning. In a supportive way, we want to challenge all of our young people to grow as individuals and acquire the skills, confidence, knowledge and qualifications to be as successful and resilient as they possibly can be when they eventually move on to further education or independence.

2. Purpose

This policy applies to **Whinfell School** sets out how we will deliver accessibility for learners, colleagues, and the wider community across all sites. It provides a universal framework and outlines the expectations that apply to:

- Staff (teachers, tutors and the wider staff team)
- Senior leaders
- Learners
- Visitors and contractors (where relevant)

By using this policy, **Whinfell School** meets statutory duties, upholds safeguarding responsibilities, complies with data protection requirements, and sustains high-quality, inclusive provision. In practical terms, that means accessible teaching and tutoring, a progressively more accessible estate, and information that people can actually use—digital and otherwise.

3. Scope

This organisational policy applies across all education sites, services and functions. It establishes the universal standards and expectations that must be followed consistently throughout the organisation.

Each site implements these standards in accordance with the statutory and regulatory requirements of the nation in which it operates as set out in **Appendix A-C**.

4. Local Adaptation Requirement

Some sections in this policy are marked *Adapt Locally*. These sections are completed by each site to reflect local operational procedures or national equivalents (e.g., safeguarding framework, inspection remit, curriculum/quality framework, data protection contacts).

Where England-specific statutory references appear in the universal policy, sites in Wales and Scotland insert their own national equivalents into the marked *Adapt Locally* sections.

All local additions are:

- Accurate
- Up to date
- Consistent with national legislation and regulator guidance
- Fully aligned with the universal standards in this policy

Where no local adaptation or local equivalent is required, the universal content remains fully applicable.

5. Legal and Regulatory Context

Whinfell School is governed by the statutory duties, safeguarding requirements and inspection arrangements of the nation in which it operates. The universal standards in this policy are implemented in line with the correct national frameworks set out in **Appendices A–C**, which summarise the legal, regulatory and inspection requirements for England, Wales and Scotland.

6. Our commitment

We want every learner, colleague, parent/carers, and visitor to feel the site was designed with them in mind. That commitment shows up in two ways: first, we **anticipate** barriers and remove them where we can; second, when barriers still arise, we **respond quickly** with reasonable adjustments so participation is the norm, not the exception. This policy gives each site a clear, practical framework for doing that consistently, in line with national law and inspection expectations.

6.1 Access to Learning (teaching, tutoring and support)

In classrooms and workshops, teachers and tutors plan for inclusion from the outset, not as an afterthought. Lessons assume a range of needs will be present; materials are prepared in accessible formats; assistive technologies are used confidently. Barriers—whether physical, sensory, cognitive, or related to communication—are anticipated and reasonable adjustments are implemented quickly. This reflects the

anticipatory nature of accessibility planning in schools and the Equality Act's wider duties.

6.2 Access to the Physical Environment (estate and operations)

Entrances, circulation routes, toilets, teaching spaces, signage and wayfinding are progressively improved through estates plans that prioritise dignity and independence. Personal Emergency Evacuation Plans (where required) are in place, tested, and understood. Capital and maintenance plans explicitly show how accessibility is being improved over time in line with the regulatory and legislative frameworks where the site is located.

6.3 Access to Information (communications and digital)

Letters, handbooks, timetables and assessments are designed to be readable and available in alternative formats on request, with clear turn-around times that we meet. Digital content follows recognised accessibility standards and is tested with real users where possible; teams use accessible templates by default and act on audit findings. *The DfE Accessibility & Inclusive Design Manual offers concrete, practical guidance on standards, testing and audits that teams can adopt across sites.*

7. Roles and Responsibilities (clear ownership and follow-through)

7.1 Staff (teachers, tutors and wider staff team)

Staff make inclusion visible every day: they plan for diverse needs, use accessible materials, and implement agreed adjustments. When barriers emerge, they log them, fix what they can, and escalate what they can't—promptly and constructively.

7.2 Senior Leaders

Senior Leaders make sure a Local Accessibility Plan (or locally required equivalent) is in place, published where required, and reviewed on the correct cycle for the nation. They assign responsibilities, align budgets, and keep an eye on impact, not just activity.

7.3 Organisation Leadership (central)

The organisation owns the universal policy, provides model templates and training, and runs proportionate assurance so we can say—confidently—how well we are doing and what we're improving next.

7.4 Learners and Families

Learners and parents/carers know how to request adjustments, give feedback, and participate in reviews. Their insights shape our priorities.

7.5 Visitors and Contractors

Visitors and contractors receive clear instructions about accessibility expectations and comply with site procedures while on the premises.

8. Reasonable Adjustments (how people get help, fast)

Requests can come from learners, families, staff or partners. We triage quickly, agree what will be done, by whom and by when, and we confirm it in writing in a plain, respectful way. Where we can't do what's asked, we explain why and offer alternatives. This process is easy to find on the site website and reflected in induction for new staff. This brings to life the anticipatory and continuing responsibilities set out in national guidance.

9. Local Accessibility Planning and Publication

Each site maintains a Local Accessibility Plan. The plan is short, concrete and public-facing (where required), with 3–5 objectives spanning: learning, environment, and information. It names leads, resources, milestones and evidence. Review cycles follow national rules regarding publishing, review cycles and alignment to local authorities associated strategies. Sites refer to Appendix A-C for guidance on requirements.

10. Monitoring, Evaluation and Assurance

We check progress termly at site level and twice-yearly across the organisation. Evidence includes learner voice, parent/carers feedback, lesson/learning walks focused on inclusion, estates progress, and digital accessibility checks. Findings feed straight into CPD, procurement, and capital planning. This ensures what's on paper is visible in classrooms, corridors and communications.

11. Training and Competence

Accessibility is part of induction for everyone and refreshed annually. Teachers and tutors get practical, subject-specific strategies for inclusive delivery. Estates and digital teams get training on standards, audits and fix-cycles. Leaders are briefed on their nation's legal and inspection expectations.

12. Feedback, Concerns and Complaints

Raising a concern is simple and safe. We publish how to do it, we respond in a timely way, and we treat every contact as a chance to learn. Trend analysis (what people ask for, how quickly we deliver, and where we're slow) informs the next iteration of the Local Accessibility Plan.

Refer to the Complaints Policy for further information.

Related Policies

- Safeguarding & Child Protection Policy
- Inclusion Policy
- Behaviour, Relationship
- Anti-Bullying Policy
- Accessibility Plan / Accessibility Strategy
- SEND Policy (England) / ALN Policy (Wales) / ASN Policy (Scotland)
- Teaching and Learning Policy
- Curriculum Policy
- Assessment
- Marking and Feedback Policy
- Admissions Policy
- Attendance Policy
- Mental Health and Well-Being Policy (MHWB)
- Equality, Diversity & Inclusion Policy
- Data Protection (GDPR) & Information Governance Policy
- Complaints Policy
- Educational Visits / Trips & Risk Assessment Policy
- Staff Code of Conduct
- Examinations

Equality Impact Statement

This policy has been developed to promote equality, safeguard individual's rights, and ensure fair and inclusive practice across all services. The potential impact of the policy on children, young people, young adults, families, and staff with protected characteristics has been considered in line with the Equality Act 2010.

No negative impacts have been identified. Staff must apply this policy with sensitivity to individual need and make reasonable adjustments to ensure equitable access, safety, wellbeing, and participation for every individual. Any emerging risks of differential impact should be reported and addressed through ongoing review and quality assurance.

Appendix A - England

Legislation, guidance and regulatory frameworks underpinning Accessibility in England.

Equality Act 2010 (incl. PSED and reasonable adjustments)

- **Means:** UK anti-discrimination law covering protected characteristics and the Public Sector Equality Duty; applies to all sites (schools and FE).
- **Requires:** Sites to prevent discrimination/harassment, make reasonable adjustments, and evidence due regard in decisions and practice. Inspectors expect inclusive culture and compliance in day-to-day operations.
- **Our stance:** We treat PSED as a live decision test; every inclusion decision is recorded with the equality rationale.
- **Implementation example:** School/College publishes annual equality objectives and logs reasonable-adjustment decisions with outcomes for Learners.
- **Links:** <https://www.legislation.gov.uk/en/ukpga/2010/15>

Equality Act 2010 — Schedule 10 (Accessibility planning)

- **Means:** Specific duty on schools to plan for access to curriculum, environment and information (accessibility plans).
- **Requires:** A published plan with measurable actions; leaders monitor delivery and impact on participation and attainment. Inspectors look for implementation, not just intent.
- **Our stance:** Every School/College maintains a Local Accessibility Plan and reports termly progress.
- **Implementation example:** Site plan shows completed estates works, alternative format timelines, and curriculum access adjustments with impact notes.
- **Links:** <https://www.legislation.gov.uk/ukpga/2010/15/schedule/10/crossheading/accessibility-plans>

Children and Families Act 2014 — Part 3 (SEND)

- **Means:** Legal framework for identifying, assessing and meeting SEND; establishes EHC plans and core principles of participation and outcomes (applies to schools and FE in England).
- **Requires:** Graduated response, joint working, timely assessments, and securing provision in EHC plans; inspectors expect evidence of effective identification and support.
- **Our stance:** We operate a consistent graduated approach and track provision-to-progress for all Learners with SEND.
- **Implementation example:** Provision mapping links interventions to assessed need, with half-termly progress reviews chaired by the SENCO/ALNCo.
- **Links:** <https://www.legislation.gov.uk/ukpga/2014/6/part/3>

SEND Code of Practice: 0–25 years (Statutory Guidance)

- **Means:** Statutory guidance on duties, policies and procedures for organisations supporting children and young people with SEND (schools and FE in England).
- **Requires:** Sites to “have regard to” the Code—graduated approach, co-production with families, and outcome-focused planning. Inspectors triangulate practice against the Code.
- **Our stance:** We align our inclusion processes and templates to the Code and audit annually for fidelity.
- **Implementation example:** EHC and SEN-Support plans show co-produced outcomes, provision, review dates, and evidence of impact.
- **Links:** <https://www.gov.uk/government/publications/send-code-of-practice-0-to-25>

Ofsted Education Inspection Framework (EIF)

- **Means:** Sets how Ofsted inspects schools and FE, including expectations for quality of education, behaviour/attitudes, personal development and leadership with inclusion threaded throughout.
- **Requires:** Providers to show ambitious, inclusive curricula; effective support for SEND; and statutory compliance (including equality/access).
- **Our stance:** We evidence inclusion through curriculum intent / implementation /impact, SEND case tracking, and behaviour/pastoral analytics.
- **Implementation example:** Inspection pack includes curriculum maps with adaptation principles, SEND deep-dive samples, and equality duty logs.
- **Links:** <https://www.gov.uk/government/publications/education-inspection-framework>

The Education (Independent School Standards) Regulations 2014 (*independent sites only*)

- **Means:** Prescribes standards for quality of education, welfare/health/safety, premises, information, complaints, and leadership/management.
- **Requires:** Proprietor and leaders to secure inclusive quality of education and compliance with equality/SEND requirements; inspectors check evidence against Parts 1, 3, 5, 6 and 8.
- **Our stance:** Independent Schools map Inclusion Policy controls to ISS parts and maintain termly compliance assurance.
- **Implementation example:** ISS compliance tracker with evidence links (policies, plans, records, walkthroughs) overseen by the Headteacher/Principal.
Links: <https://www.legislation.gov.uk/ukxi/2014/3283>

Appendix B - Wales

Legislation, guidance and regulatory frameworks underpinning Accessibility in Wales.

Equality Act 2010 (incl. PSED and reasonable adjustments)

- **Means:** UK anti-discrimination law applying to Welsh schools and FE; requires due regard and reasonable adjustments.
 - **Requires:** Sites to eliminate discrimination, advance equality, foster good relations, and evidence compliance in decisions and practice.
 - **Our stance:** Equality impact is built into site decisions; adjustments are logged and reviewed for impact.
 - **Implementation example:** Published equality objectives with mid-year progress note and adjustments register tied to Learner outcomes.
- Links:** <https://www.legislation.gov.uk/en/ukpga/2010/15>

Additional Learning Needs and Education Tribunal (Wales) Act 2018

- **Means:** Statutory ALN framework for 0–25, replacing SEN/LDD; establishes Individual Development Plans (IDPs) and rights of appeal.
 - **Requires:** Schools/Colleges and LAs to identify ALN early, prepare and maintain IDPs, and work in multi-agency ways; inspectors expect robust implementation.
 - **Our stance:** We treat IDPs as the single planning document and align support, review cycles and transitions accordingly.
 - **Implementation example:** Live IDP tracker with actions, responsible staff, review dates and outcome measures for each Learner.
- Links:** <https://www.legislation.gov.uk/anaw/2018/2/contents>

Additional Learning Needs Code for Wales (Statutory Guidance)

- **Means:** Statutory Code setting out duties and processes under the ALN Act for schools, FE, LAs and NHS bodies.
- **Requires:** Person-centred planning, timely decisions, and maintaining IDPs; Estyn expects practice to mirror the Code.
- **Our stance:** Inclusion templates (IDP, review minutes, learner voice) mirror the Code; staff CPD covers Code-to-practice.
- **Implementation example:** Site IDP quality-assurance sample each term with actions fed back to the education team.
- **Links:** <https://www.gov.wales/additional-learning-needs-code>

Increasing access for disabled pupils: planning guidance (statutory)

- **Means:** Welsh Government statutory guidance on accessibility strategies (LAs) and accessibility plans (schools) under Equality Act Schedule 10.
- **Requires:** Written strategies/plans with the 3 duties (curriculum, environment, information) and regular review (minimum 3-year cycle in Wales).
- **Our stance:** Each School/College maintains a Local Accessibility Plan aligned to LA strategy and reports annually.



- **Implementation example:** Published plan with milestones and termly progress note to governors/board.
- **Links:** <https://www.gov.wales/increasing-access-disabled-pupils-planning-guidance>

Estyn: Education Inspection Frameworks (schools, FE and other sectors)

- **Means:** “How we inspect / What we inspect” handbooks set the standards and methodology for inspection across sectors, including inclusion and ALN. [\[estyn.gov.wales\]](https://www.estyn.gov.wales)
- **Requires:** Evidence of inclusive teaching, effective ALN processes (IDPs), equality compliance and accessible communication. [\[estyn.gov.wales\]](https://www.estyn.gov.wales)
- **Our stance:** We maintain an inspection pack linking the Inclusion Policy, IDP practice, and accessibility evidence to Estyn’s criteria.
- **Implementation example:** Pre-inspection summary with ALN caseload data, IDP timeliness, and curriculum adaptation examples.
- **Links:** <https://estyn.gov.wales/inspection-guidance-resources/>

Independent School Standards (Wales) Regulations 2024

- **Means:** Prescribes standards (quality of education; welfare/health/safety; premises; information; complaints; leadership) and clarifies proprietor accountability.
- **Requires:** Active promotion of safeguarding and compliance with ALN/Equality duties; Estyn inspects against these standards.
- **Our stance:** Independent Schools maintain a standards-to-evidence map for inclusion requirements.
- **Implementation example:** Proprietor-owned compliance log (Parts 1, 3, 5, 6, 8) with termly review by the Headteacher/Principal.
- **Links:** <https://www.legislation.gov.uk/wsi/2024/27/made>

Appendix C – Scotland

Legislation, guidance and regulatory frameworks underpinning Accessibility in Scotland.

Equality Act 2010 (incl. PSED and reasonable adjustments)

- **Means:** UK anti-discrimination law applying in Scotland; duties on public bodies and education providers.
- **Requires:** Inclusive culture, reasonable adjustments and due regard; inspectors look for compliance woven through daily practice.
- **Our stance:** Equality duty is embedded in all site decisions and reviews.
- **Implementation example:** Equality impact notes on key decisions and an adjustments log with impact on Learners' participation.
- **Links:** <https://www.legislation.gov.uk/en/ukpga/2010/15>

Education (Additional Support for Learning) (Scotland) Act 2004

- **Means:** Statutory framework for identifying and meeting Additional Support Needs (ASN), including CSPs, mediation and tribunal routes.
- **Requires:** Education authorities and sites to identify needs, make adequate and efficient provision, and work in multi-agency ways.
- **Our stance:** We apply the ASL duties through a clear graduated approach and multi-agency planning for Learners.
- **Implementation example:** ASN register with assessed needs, planned supports, review cycles and outcome measures.
- **Links:** <https://www.legislation.gov.uk/asp/2004/4/contents>

Supporting Children's Learning: Code of Practice (Statutory Guidance)

- **Means:** Statutory guidance to the ASL Act, setting duties for education authorities and partners; clarifies processes and rights.
- **Requires:** Sites to have regard to the Code—participation, early identification, coordinated planning and rights-based practice.
- **Our stance:** Our inclusion processes mirror the Code; staff training covers Code-to-practice.
- **Implementation example:** Planning paperwork evidences learner/parent voice, multi-agency input and timely reviews.
- **Links:** <https://www.gov.scot/publications/supporting-childrens-learning-statutory-guidance-education-additional-support-learning-scotland/>

Education (Disability Strategies and Pupils' Educational Records) (Scotland) Act 2002

- **Means:** Requires Accessibility Strategies to improve access for disabled pupils (curriculum, environment, information).
- **Requires:** Local strategies with measurable actions; schools align site-level plans to the LA strategy and track delivery.

- **Our stance:** Each School/College aligns its Local Accessibility Plan to the authority's strategy and reports progress annually.
- **Implementation example:** Estates and information-access workplan with milestones and learner impact evidence.
- **Links:** <https://www.legislation.gov.uk/asp/2002/12/contents>

GIRFEC (Getting it right for every child)

- **Means:** Scotland's national approach for wellbeing, early intervention and coordinated planning across services.
- **Requires:** Child-centred, rights-respecting practice using the National Practice Model; inspectors expect GIRFEC principles in daily work.
- **Our stance:** Inclusion plans use the wellbeing indicators (SHANARRI) and named person/lead professional arrangements where applicable.
- **Implementation example:** Child's-plan style records show needs analysis, coordinated actions and review against wellbeing outcomes.
- **Links:** <https://www.gov.scot/policies/girfec/>

How Good Is Our School? (HGIOS4) — Self-evaluation framework

- **Means:** National self-evaluation framework used to drive improvement, with QI 3.1 focusing on wellbeing, equality and inclusion.
- **Requires:** Sites to evidence inclusive culture, equitable outcomes as effective supports through self-evaluation and improvement planning.
- **Our stance:** We use HGIOS4 QIs to test inclusion impact and set improvement actions.
- **Implementation example:** Annual self-evaluation against QI 3.1 with actions embedded in the School/College improvement plan
- **Links:** https://education.gov.scot/media/2swjmnbs/frwk2_hgios4.pdf

HMIE / Education Scotland — Inspection and standards framework

- **Means:** National inspection frameworks and standards set out what is inspected and how evidence is evaluated across sectors.
- **Requires:** Demonstrable inclusion practice in leadership, learning/teaching, and outcomes; providers should align self-evaluation with inspection standards.
- **Our stance:** We maintain an inspection pack aligning Inclusion Policy evidence to HMIE frameworks.
- **Implementation example:** Pre-inspection brief with HGIOS4 self-evaluation, ASN data and accessibility strategy alignment.
- **Links:** <https://educationinspectorate.gov.scot/inspection-frameworks/>