

Policy No: EN07.1

## **RIKKYO SCHOOL**

Lead Person for Policy: Mr. Rob Preddy (Director of Operations)

#### 3-YEAR ACCESSIBILITY PLAN SEPTEMBER 2024 – AUGUST 2027

This policy applies to the whole school, including boarding

The Policy is publicly available on the school website and upon request a copy (which can be made available in large print or other accessible format if required) may be obtained from the School Office. All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school.

We have a whole school approach to safeguarding, which is the golden thread that runs throughout every aspect of the school. All our school policies support our approach to safeguarding (child protection). Our fundamental priority is our children and their wellbeing; this is first and foremost.

All who work, volunteer or supply services to our school have an equal responsibility to understand and implement this policy and its procedures both within and outside of normal school hours including activities away from school. This policy also takes into consideration the National Minimum Standard (NMS) for residential special schools (RSS).

In our school the term 'staff', in the context of safeguarding, is inclusive of all staff and is also inclusive of students on placement, contractors, agency staff, volunteers and proprietor.

#### **Legal Status:**

- Equality Act 2010 (which defines disability as a 'physical or mental impairment which has a substantial and long-term adverse effect on someone's ability to carry out normal day to day activities');
- Schedule 10 of the Equality Act; and,
- Part 1(2)(d)(ii) The Quality of Education Provided (curriculum) of The Education (Independent School Standards) (England) Regulations currently in force which encourages respect for other people, paying particular regard to the protected characteristics set out in the Equality Act 2010.

#### Rikkyo Strategy:

Rikkyo's strategy is to address and comply with the requirements of the Disability Discrimination Act 1995 and the Special Educational Needs and Disability Act (SENDA), as amended. Schools are under a duty to prepare an Accessibility Strategy and Plan to increase the accessibility of their individual schools.

#### **Availability:**

This Policy is made available to parents, staff and students in the following ways: available from the School Office electronically, or hard copy from the PA to the Director of Operations.

Monitoring and Review: The text of this policy is necessary and proportionate to meet the needs of Rikkyo School, supporting the staff who work with our pupils, making clearer the responsibilities of school staff, volunteers, proprietor and the Board of Governors. This policy is subject to continuous monitoring, refinement and audit by M J Sugiyama (President of the Japanese Board of Trustees), the Chair of the Governance Advisory Board, Dr T Okano (Headmaster) and Mr J Buckles (Bursar). The UK Board of Governors will undertake a full annual review of this policy and procedures, inclusive of its implementation and the efficiency with which the related duties have been discharged. This discussion will be formally documented in writing. The UK Board of Governors recognises the expertise staff build by undertaking safeguarding training and managing safeguarding concerns. Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff will be informed of the update/reviewed policy, and it is made available to them in either a hard copy or electronically.

Date reviewed: October 2025
Date of next review: August 2026
Date of next major review: August 2027

Signed:

岡野透 JN Pratten
Dr T Okano Mr J N Pratten
Headmaster Chairman

SENDA 2001 refers to disabled students in a wide sense, including those with special educational needs and those with learning difficulties and disabilities. The Act obliges us not to treat disabled students less favourably and to take reasonable steps to avoid putting disabled students at a substantial disadvantage in matters of admission and education. This Accessibility plan covers the following areas:

- the extent to which disabled students (including those with learning difficulties) can participate in the whole curriculum;
- making written information accessible in a range of different ways for disabled students, where it is provided in writing for students who are not disabled.
- proposed developments in physical access to education and associated services.

# **Disabled Staff**

We will ensure that in recruitment procedures any advertisements, short listing and interview procedures are without any hint of direct or indirect discrimination. In all staff appointments the best candidate will be appointed based on strict professional criteria. Rikkyo will make reasonable adjustments in order to ensure that disabled staff or prospective staff are not placed at a disadvantage in comparison with non-disabled staff. This includes an acceptance of the need to make reasonable adjustments to accessibility and physical layout of classrooms as well as reasonable improvements for visual, auditory or other impairments. Staff duties may also be adjusted, if possible, to meet the needs of the individual.

The Equality Act 2010 defines disability as 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 any student with 'significantly greater difficulty in learning than the majority of children of his/her age' or 'a disability which means that a student cannot make full use of the general educational facilities' provided for children of their age in mainstream schools. Not all children are disabled by their SEND and vice versa. For the purpose of the disability access plan, 'disabled children' refers not only to those with physical disabilities but could include, for example, those with health issues, including mental health, or learning disabilities if they meet the legal definition of 'disability'. We do not treat disabled children less favourably; we also take reasonable steps to avoid putting disabled children at a substantial disadvantage (the 'reasonable adjustment' duty) in matters of admission and education.

#### Applies to:

The whole school along with all activities provided by the School, including those outside of the normal school hours. All staff (teaching and non-teaching), the UK Board of Governors and volunteers working in the school.

#### Introduction

In accordance with the Equality Act 2010, Rikkyo School must take steps to make reasonable adjustments for students and applicants with disabilities so that they are not put at a substantial disadvantage when compared with students and applicants who are not disabled. Rikkyo therefore seeks to cater for each situation on its individual merits. We are committed to providing an environment which values and includes all children, staff, parents and visitors regardless of their educational, physical, sensory, social, spiritual, emotional and cultural needs. We challenge attitudes about disability and accessibility, developing a culture of awareness, tolerance and inclusion. We take positive action, in the spirit of the Equality Act 2010, with regard to disability and to developing a culture of inclusion, support and awareness within the school and this includes improving the delivery to children with special needs which is readily accessible to all. This Plan sets out the principles underlying our approach to making adjustments for students and applicants with disabilities and the factors Rikkyo will take into account when considering requests for reasonable adjustments.

Therefore, our three-year Accessibility Plan is for:

• improving the physical environment of the school for the purpose of increasing the extent to which disabled children are able to take advantage of education and benefits, facilities or services provided or offered by Rikkyo School; • increasing the extent to which disabled children can participate in the school's curriculum; and,

Improving accessibility to assessment, recording and reporting systems.

#### Background: The Equality Act 2010 places a duty on all of us to have due regard to:

- elimination of discrimination and harassment of disabled persons that is related to their disabilities;
- promotion of equality of opportunity for disabled persons and others;
- promotion of positive attitudes towards disabled persons;
- encouragement of participation by disabled persons;
- taking account of disabled persons' disabilities, even where that involves treating disabled persons more favourably than others; and,
- not to treat disabled students less favourably.

The Accessibility Plan should be read in conjunction with the following policies, strategies and documents:

- School Prospectus
- Single Equalities Policy
- Health and Safety Policy
- Special Educational Needs and Disabilities Policy
- Curriculum Teaching and Learning Policy
- Behaviour and Discipline Policy
- Risk Assessment and Student Access to Risky Areas Policy
- · Positive Mental Health and wellbeing Policy
- Emergency Evacuation Procedures
- Reasonable Adjustments Policy

#### **Accessibility Plan Content**

Our three-year plan includes how we plan to:

- increase the extent to which disabled children (including those with special educational needs) can participate in Rikkyo School curriculum:
- improve the provision to disabled children of information, which is already in writing for children who are not disabled;
- improve the physical environment of Rikkyo School to increase the extent to which disabled children are able to take advantage of education and associated services offered by the school.

In producing this plan, the following Senior Leaders have had input into the development of the plan:

- Headmaster
- Deputy Head (Pastoral)
- Deputy Head (Academic)

Students at Rikkyo School are not discriminated against, with particular regard being paid to the protected characteristics set out in the Equality Act 2010 and to their cultural background, linguistic background, special educational need, sexual orientation, gender reassignment or academic or sporting ability. Rikkyo School embraces diversity and exhibits tolerance. All Equality Objectives are seeking to protect children identified by the **Nine Protected Characteristics (NPC)**: Race; Disability; Sex; Age; Religion or Belief; Sexual Orientation; Gender re-assignment; Pregnancy and Maternity, and children who are linked by association.

Rikkyo School Accessibility Plan has been developed and drawn up based upon information supplied by DfE and consultations with children, parents, staff and the UK Board of Governors. Other outside agencies and specialists have also been consulted. The document will be used to advise other school planning documents and policies and will be reported upon annually in respect of progress and outcomes. Rikkyo School is committed to providing an environment that enables full curriculum access that values and includes all children, staff, parents and visitors regardless of their education, physical, sensory, social, spiritual, emotional and cultural needs. Rikkyo School Accessibility Plan shows how access is to be improved for disabled children, staff and visitors to the school within a given timeframe, anticipating the need to make reasonable adjustments to accommodate their needs where practicable.

## The Accessibility Plan contains relevant and timely actions to:

• increase access to the curriculum for students with a disability, expanding the curriculum as necessary to ensure that students with a disability are as equally prepared for life as are the able-bodied students; this covers teaching and learning and the wider

curriculum of Rikkyo School, such as leisure and cultural activities or schools visits – it also covers the provision of specialist or auxiliary aids and equipment, which may assist these students in accessing the curriculum within a reasonable timeframe;

- improve and maintain access to the physical environment of Rikkyo School, adding specialist facilities as necessary this covers improvements to the physical environment of the school and physical aids to access education within a reasonable timeframe;
- improve the delivery of written information to children, staff, parents and visitors with disabilities; examples might include handouts, timetables, textbooks and information about the school and school events;
- ensure the information is made available in various preferred formats within a reasonable timeframe.

Our Accessibility Plan relates to the key aspects of physical environment, curriculum and written information. Whole school training will recognise the need to continue raising awareness for staff and the UK Board of Governors on equality issues with reference to the Equality Act 2010.

The Accessibility Plan for physical accessibility relates to the Access Audit of the school, which was originally undertaken by Rikkyo School and remains the responsibility of the UK Board of Governors and ultimately the Anglo Japanese Executive Committee. It may not be feasible to undertake all the works during the life of this accessibility plan and therefore some items will roll forward into subsequent plans. An accessibility audit will be completed by Rikkyo School prior to the end of each period covering this plan to inform the development of a new Accessibility Plan for the on-going period. Equality Impact Assessments will be undertaken as and when school policies are reviewed.

Admissions Policy: Each student with a disability requires special consideration and treatment. If appropriate, adjustments will need to be put in place. We recognise that some disabled students may require specialist support, and we would normally discuss this issue thoroughly with parents and their medical advisors before the child enters Rikkyo School. Once parents have accepted the offer of a place for their child and before they become a student at Rikkyo School, we will also discuss the adjustments that can reasonably be made. Copies of our SEND Policy may be obtained on request.

Rikkyo School asks parents to complete a form in respect of a prospective student at the time of application. In assessing any student or prospective student, the school may take advice and require assessments as it regards as appropriate. Subject to this, Rikkyo School will be sensitive to any requests for confidentiality. The admissions staff welcome information concerning a prospective student's special needs at the earliest possible stage in the application process. Such information will enable Rikkyo School to consider any adjustments it might need to make and to offer the best possible advice.

Rikkyo School policy is to support all students and potential students regardless of any disability of which it is aware, subject to its obligation to make reasonable adjustments not to put any disabled student or potential student at a substantial disadvantage compared to any student who is not disadvantaged because of his or her disability.

# When does the duty arise?

A student or applicant is disabled if they suffer from a 'physical or mental impairment that has a substantial and long-term negative effect on his or her ability to carry out normal daily activities' (Equalities Act 2010). In most cases, disabilities will have lasted or be likely to last for 12 months or more.

#### What is the scope of the duty?

Rikkyo School seeks to ensure that students with disabilities and applicants are not put at a substantial disadvantage, by making reasonable adjustments:

- to our policies and practices (i.e. the way we do things); and
- by providing auxiliary aids and services (i.e. additional support or assistance).

There is no standard definition of an auxiliary aid or service. Examples include:

- · pieces of equipment;
- extra learning support assistance;
- note-taking;
- induction loops;
- audio-visual fire alarms;
- readers; and

assistance with guiding.

## The school's response

In some cases, Rikkyo School will be able to agree to and implement the requested adjustment as soon as possible. In other cases, for example where the adjustment would be logistically difficult or more financially costly, we may need to consider in more detail how best to overcome the substantial disadvantage that the student or applicant is suffering and what measures it is reasonable for the school to take. In these cases, Rikkyo School may seek input from teachers, other experts (such as doctors and/or educational psychologists), therapists, parents and the child in question.

#### How will the school decide whether an adjustment is reasonable?

When considering whether it would be reasonable to make the adjustment, the school will consider the following factors:

- whether making the adjustment would overcome the substantial disadvantage the child is experiencing;
- the practicability of the adjustment;
- · the effect of the disability on the student;
- · the cost of the proposed adjustment;
- the school's resources;
- health and safety requirements;
- the need to maintain academic, musical, sporting and other standards; and,
- the interests of other students (and potential students).

#### **Summary and Conclusion**

Whilst we are confident that the School has made all necessary adjustments to ensure that no current students are treated less favourably or disadvantaged by physical or mental impairments (typically by making adjustments to support those with ASD & Language Disorders, Dyslexia, DCD, Dyscalculia, ADHD, Emotional Difficulties, Anxiety, EAL or hearing impairments, and by supporting students with long term medical conditions or significant physical impairments), we recognise that the School or its operations are not set up to support students with more severe physical or mental disabilities. Given our experience to date, we are confident that we could adjust teaching methods, facilities and communication materials to ensure that any student applying or gaining entry to the School is not placed at a significant disadvantage. The School's Accessibility Plan 2024-2027 lays out at a high level the short, medium and longer-term priorities for action to help overcome the potential barriers identified. This plan is reviewed and updated regularly.

# Increasing the Extent to Which Disabled Students Can Participate in the School Curriculum

The Curriculum in this context incorporates both the academic and co-curricular curriculum

In the academic year 2025-2026 the Rikkyo School currently has no students with a recorded learning disability on the school roll, nor any students with another recorded disability who cannot participate in the unadjusted academic school curriculum.

	Targets	Strategies	Outcome	Time frame	Goals achieved
Short term	Enable Learning Support staff and relevant co-curricular staff to increase their knowledge and understanding of needs of disabled and neurodiverse students.	Training of Learning Support and co-curricular staff.	Staff confidence in providing appropriate teaching and support for disabled and neurodiverse students.	Flexible approach to disabled and neurodiverse students	Disabled students can access a full range of co-curricular options.  Learning Support staff are ready to support the needs of student(s) with a learning disability.
Medium term	In the case that a student with a learning disability is a prospective entrant, enable Heads of Faculty to increase their knowledge and understanding of needs of disabled and neurodiverse students.	Training of Heads of Faculty.	Heads of Faculty adapt the academic curriculum to enable full access for disabled and neurodiverse students.	Flexible approach to disabled and neurodiverse students. One term lead in time.	Disabled or neurodiverse student has full access to academic curriculum.
Long term	In the case that a student with a learning disability enters the School, enable classroom teachers to increase their knowledge and understanding of needs of disabled and neurodiverse students.	Training teachers.	Teachers are trained to teach the adapted curriculum to disabled and neurodiverse students.	Flexible approach to disabled and neurodiverse students. One term lead in time.	Disabled or neurodiverse student is taught full curriculum and achieves comparable value added exam results.

Improving the physical environment of the school to increase the extent to which disabled Students are able to take advantage of education and benefits, facilities or services provided and offered by the school

	Targets	Strategies	Outcome	Time frame	Goals achieved
Medium term	Ensure that all buildings are user friendly for wheelchair users, and those with hearing or visual impairment	When refurbishing buildings ensure that works are completed to satisfy Part M of the Building regulations wherever possible	School buildings and facilities are accessible to everyone	As required to meet individual needs and when buildings are refurbished	Disabled students can access facilities within School
Medium term	Good quality compliant disabled toilet facilities distributed across the site	Provide disabled toilet facilities in Maple and Oak Houses	Disabled toilet facilities are available to students	When Buildings are refurbished	
Medium term	Improve signage to disabled toilets and parking	Plan as part of signage project	Clearer sign-posting for disabled facilities	September 2026	Improved information about disabled facilities

# Improving the delivery to disabled Students of information which is readily accessible to Students who are not disabled

	Targets	Strategies	Outcome	Time frame	Goals achieved
Medium Term	Staff Training on Microsoft Built- in Accessibility Tools  Maintain DfE Digital Accessibility Standards:  Making digital products, content, and services accessible and usable for all.  Ensuring that everyone can access the same information and use equipment, regardless of their needs and situation.  Provide adaptive technologies and tools that can assist neurodiverse students in navigating digital spaces more comfortably and safely	Provide ongoing training for staff in supporting neurodiverse students and those with disabilities to enable accessibility tools available to them on their own laptops.  • Ensure that digital media used in classrooms meets the needs of neurodiverse students and those with disabilities such as visual impairments.  • IT & Digital Team to continue working with the Learning Strategies department to review and support adaptive technology, including screen readers, text-to speech software, and other assistive technologies.	Neurodiverse students and those with visual and hearing impairments are able to access and digital media	Implemented by April 2027	
Long Term	The development of a digital wellbeing strategy to include providing tailored digital wellbeing resources and support	Create digital wellbeing resources designed to meet the needs of neurodiverse students and those with disabilities. Ensure these resources are available in multiple formats (e.g., text, audio, video) to accommodate different learning needs			