Policy No.EN07.1.6

RIKKYO SCHOOL

3-YEAR ACCESSIBILITY PLAN SEPTEMBER 2024 – AUGUST 2027

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

This policy applies to the whole school

The Policy is available to the school staff via TEAMS and Staff Share

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 Accessibility Plan takes account of the Department for Education National Minimum Standards for Boarding Schools, in particular Standard 3 (Inclusion, equality and diversity), Standard 4 (Boarding accommodation) and other standards relating to the individual and special requirements of boarders.

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 Equality Act 2010 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. These principles apply equally to boarders, and individual needs are taken into account in their care, accommodation and participation in boarding life so as to promote an inclusive boarding environment.

Availability:

This Policy is made available to parents, staff and students in the following ways: available from the School Sharepoint, or hard copy from 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 students, 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 2026
Date of next review:	October 2027
Date of next major review:	September 2027

Signed:

岡野　透	*J N Pratten*
Dr T Okano	Mr J N Pratten
Headmaster	Chairman

The Equality Act 2010 requires the School not to discriminate against disabled students and to make reasonable adjustments to avoid disabled students being placed at a substantial disadvantage. This duty operates alongside the School's responsibilities towards students with special educational needs under the Children and Families Act 2014. These Acts oblige 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:

- Boarding Handbook
- Single Equalities Policy
- Health and Safety Policy
- Special Educational Needs and Disabilities Policy
- Curriculum Teaching and Learning Policy
- Behaviour Policy
- Risk Assessment and Student Access to Risky Areas Policy
- Positive Mental Health and wellbeing Policy
- Emergency Evacuation Procedures

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)**: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation 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 hand-outs, 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'* (Equality 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.

Boarding accommodation

The School will ensure that the accessibility needs and special requirements of individual boarders are considered when allocating and reviewing sleeping accommodation. This will include, where applicable, physical, medical, sensory, learning, emotional and behavioural needs and any reasonable adjustments required. Individual risk assessments will be undertaken and recorded where appropriate.

The accessibility of boarding toilet, shower and washing facilities will form part of the School's accessibility audit. Where a boarder has additional physical, medical or sensory requirements, the School will assess their individual needs and make reasonable adjustments to ensure appropriate access to washing and toilet facilities, taking account of the student's dignity, privacy and independence.

Boarding activities and recreational facilities

The School will take reasonable steps to ensure that disabled boarders and boarders with special requirements can participate in the range of recreational, social and enrichment activities available during boarding time. Accessibility and reasonable adjustments will be considered when activities are planned and risk assessed.

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 of Current Provision: Rikkyo's physical layout consists of buildings which have grown since the school was founded. There are fixed classrooms for each subject in the secondary phase, based on the valid ground of having all the facilities for one subject in one place. This requires students to move from classroom to classroom.

Many of the targets in our Accessibility Plan, once met, will become an annual provision.

TASK OR ISSUE	ACTION	LEAD	TIMEFRAME	STATUS
Facilities				
Ensure ramped accesses to all ground floor corridors.	Director of Operations to audit.	Director of Operations	Complete we also have temporary ramps we can use as required	Completed
Investigate feasibility of improving access within any plans for redecoration and refurbishment of buildings. Consider appropriate colour schemes to benefit students with visual impairments and install window blinds where appropriate.	Continuing refurbishment and upgrading of existing facilities where appropriate.	Director of Operations	On-going	Ongoing
Improve step-free access to the dining hall and adjacent teaching spaces.	Regrade/replace paved area following accessibility assessment	Director of Operations	August 2028	
Ensure that boarding accommodation is accessible to individual boarders with disabilities or special requirements.	Carry out and record an accessibility assessment of boarding accommodation, including bedrooms, circulation routes, entrances/exits, toilet and washing facilities and emergency evacuation arrangements. Identify reasonable adjustments required for any individual boarder with a disability or special requirement.	Director of Operations / Director of Pastoral Care	Annual review and upon admission or identification of an individual need	On-going
Emergency Evacuation Procedures	Personal Emergency Evacuation Plans (PEEPs) will be developed where required for boarders, staff or visitors whose disability or individual needs may affect their ability to respond to an alarm or evacuate safely. For boarders, the assessment will specifically consider evacuation from sleeping accommodation during boarding time and overnight.	Director of Operations	Annual review and upon admission or identification of an individual need	On-going
Welfare, Health and Safety of Students				
Ensure effective provision for healthcare and medication provision.	Review / Update medical policy and procedures.	Head of Health and Wellbeing	On-going	On-going

				Review Spring 2027
Establish an annual audit of Health and Safety across the school site		Director of Operations	Annually	On-going with revisions as required
Ensure the school can protect and support students with allergies as practicably as possible.	Establish Risk Assessments for students with severe allergies. Ensure all staff are informed about any allergy and food lists updated. Ensure anaphylaxis policy is compliant with current legislation and best practice	Head of Health and Wellbeing	On-going	On-going
Ensure medical information for specified children is clearly disseminated to required staff for school or off-site activities.	Liaison with parents to formulate plans. Information on specific students, including asthmatics and diabetes to be disseminated. Diabetes training for staff. Emergency Asthma and Epi-pen box in school office. Defibrillator on site	Head of Health and Wellbeing	On-going	On-going
Health and Safety training for all staff as part of initial induction or as required.	All staff to complete online or site-based training in Health and Safety, including Fire-safety.	Director of Operations	On-going	Provided at induction and INSET
To provide opportunity for students to develop their mental wellbeing.	Students are given the opportunity to attend Pastoral drop-ins.	Director of Pastoral Care	On-going	On-going
Wheelchair available for emergency use.	Wellbeing	Head of Health and Wellbeing	Apr 25	Completed
If a visually impaired student were to join the school, investigate alternative forms of written materials for.	Learning Support Team to investigate Application form. This has not been needed yet although visual stress is accommodated via support from OT	Learning Support Team	When required	When required but strategy being researched
Provision for hearing impaired students and staff.	Hearing impaired students are identified and receive regular visits from professionals to ensure students are able to learn / have procedures in place in case of Fire Alarms.	Director of Pastoral Care Registrar HoLS	On-going	On-going
Quality of Education Provided				
Ensure all students have the opportunity to fulfil their potential.	Established clear screening method for new students Tracking of students' progress to identify areas of concern	Admissions Team Heads of Departments	On-going	On-going

	Annual Reviews	Deputy Head (Academic)		
Monitoring students' progress in accessing curriculum/ assessments/examinations	Assessing kanji levels and reading comprehension in students who are not progressing as expected; procuring YARC materials and undertaking assessments when the need arises; other responses when required. Train two teachers in using YARC assessment.	HoDs Director of Curriculum Development	On-going	On-going
Review reporting and assessment procedures	New AR system to be introduced. INSET to be provided. Increased provision of summative data into parental reporting. Introduce baseline assessment in reading in the new English Curriculum as of April 2025. Assess to track progress and understand where students are not making expected progress	SMT Director of Curriculum Development	April 2025	Completed
Staff needing to find information about students in many different locations and on different documentation.	Review and implement change into the assessment, recording and reporting system, making best use of iSAMS.	SMT	On-going	On-going
Provision for practical subjects	Review work in practical subjects (e.g. Creative arts and physical education) to ensure students with difficulties are properly catered for	SMT Deputy Head (Academic)	Ongoing	Ongoing
Monitor provision for students with disabilities on all residential visits including day, week or overseas trips. SMT to keep up to date with current regulations and to check website 'learning outside the classroom / OEAP'; information on specific students including nut allergy sufferers, asthmatics and diabetes to be disseminated by Director of Pastoral Care/Medical Administrator to trip organizers and leaders; if necessary, trip leaders to receive EpiPen training / diabetes / epilepsy.	Blanket medical form which enables students to go on all educational trips throughout the year. Specific medical forms for trips abroad. Medical training for staff. Medical / specific needs as identified in Risk Assessments. Ensure inclusivity, if appropriate, of all residential visits for students. Appoint a Head of OE to manage and inform RAs.	Director of Pastoral Care	Ongoing	Ongoing
Review strategies on use of IT to facilitate students with organization or memory problems	Teachers to ensure students have access to appropriate IT system and software to support their needs. Audit ICT provision across the school Introduction of Clicker 8 and Creation of Prep ICT room	SMT	On-going	Will always be on-going Completed
Review Screening procedures ensure all students are appropriately placed.	HoLs to screen paperwork and advise Registrar.	HoLs	Ongoing as standard practice	Completed

Staff Training				
Develop staff CPD programme to ensure all staff and teaching assistants are able to identify and teach students with learning difficulties	Introduction of Educare CPD package for all staff Training provided at INSET to support students with SEN / de-escalation techniques / mental health Pastoral Team update whole staff via email and links to support.	SMT and SENCo Director of Pastoral Care	On-going Autumn 2025	Educare introduced Sept 2024