



**BEDFORD
GIRLS'
SCHOOL**

Accessibility Plan - 2022 -2025

Reviewed August 2023

Next Review August 2025

Reviewed by Director Finance and Operations (DFO)

1.0 Introduction

1.1 Bedford Girls' School (BGS) is an independent, fee paying school. The BGS community includes all students, all members of staff, parents and friends of BGS. BGS is committed to equality of opportunity for all current and prospective members of its community. The School welcomes applications from prospective students with and without additional needs, including those with Education and Health Care Plan (EHCPs).

2.0 This is the School's fourth Disability Access Plan effective from 1 September 2022 to 31 August 2025. The plan has been prepared by the School, has been approved by the School Committee of Governors and has been communicated to all staff and is available on the staff intranet (The Eyrie). The plan is also available for inspection on the policy section of the school website and its whereabouts has been communicated to all parents and girls.

3.0 Policy Statement on Site Accessibility

The school has a legal duty to be non-discriminatory towards students, staff and visitors and to provide equal access and opportunity, including access to the curriculum for the students. This policy statement explains the School's policy under the three areas described below:

The BGS Accessibility Plan 2022-2025 ("the Plan") has three inter-linked elements:

(i) Improvements in access to the curriculum by:

1. Providing for all students a curriculum which is appropriate to their needs
2. Ensuring that the curriculum is delivered in such a way that all students may benefit fully from it
3. Ensuring staff have the ability and facilities to deliver a full curriculum

(ii) Physical improvements to increase access to education and associated services by:

1. Ensuring that all the School buildings and grounds are fully accessible to those with mobility, sensory and other impairments;
2. Providing appropriate educational equipment and physical aids to ensure that educational programmes in the School can be fully delivered by staff and accessed by all students

(iii) Improvements in the provision of information in a range of formats by:

1. Providing for students, parents or guardians and visitors information about the School, including safeguarding, fire safety, Health & Safety and its curriculum in a format that takes account of any additional needs.

4.0 Admissions

- 4.1 The School admits students at various entry ages on an academic selective basis based on performance in examinations backed up by reports from the current school. Wherever possible and practicable, additional needs will not prevent a student from selection who is otherwise up to the academic standard required and who is in a position to benefit from the education offered at BGS.
- 4.2 The School operates an inclusive Admissions Policy, which it believes enriches School life, but the prospective student must be able to access the mainstream curriculum at an age appropriate level. The school also expects all students to take a full part in other activities, participating in sports, drama, music, camps and trips. The School will make reasonable adjustments to cater for the needs of applicants while giving equal importance to ensuring that no other student's education is impaired.
- 4.3 Before accepting a student onto the School Roll, we want to be confident that we can support the prospective student and her peers in achieving their potential. Parents are expected to support the School and to trust us. We are honest with parents about BGS; we ask parents to be honest with us and to be open about any issue relating to their daughters.
- 4.4 We are committed to supporting learning. Setting is restricted and additional in-class support is provided in some subjects. Withdrawal for learning support is limited. We are used to teaching students with a range of abilities, but the School acknowledges that it may not be able to provide the level of intensive support required by some children.
- 4.5 At BGS we are particularly mindful of the importance of home School links. The SEN Code of Practice highlights, "The relationship between parents of children with Special Educational Needs and the School which their child is attending has a crucial bearing on the Child's educational progress and the effectiveness of any School-based action."
- 4.6 In determining what is reasonable the School will have regard to:
 - The financial resources available to the School;
 - The costs of any particular alteration to the premises, staffing arrangements, or special equipment required;
 - The practicality of making reasonable adjustments;
 - The extent to which aids and services will be provided via an EHCP or by provision paid for outside the School's resources;
 - Health & Safety requirements; and
 - The interests of other students.
- 4.7 Parents or guardians of children with additional needs are expected to notify the School of them at the point of registration. If these are not known at the time, the School should be notified as soon as they are recognised. Prior to any interview or visit, parents may be asked to provide copies of any professional reports e.g. Educational Psychologist's report or professional reports from other agencies or a Learning Support Needs (if applicable). The School's Learning Support Policy provides further guidance. Early notification is of great value, as it will enable the School to liaise with parents and/or existing schools to

establish what reasonable adjustments can be made at BGS to support students attainment and accessibility.

- 4.8 As part of the Admissions' process, staff will meet with parents to discuss whether or not a prospective student will be able to access the curriculum and what reasonable adjustments can be made to facilitate this. In determining this, the School may advise additional assessments for further clarification. If after consultation, the School decides that it cannot discharge its legal and moral responsibilities to educate the prospective student and/or its contractual duties to the parent(s), BGS will be unable to offer a place.
- 4.9 If the School is satisfied that with reasonable adjustments prospective student can participate in the School, then, subject to availability, a place will be offered. Where the School agrees to provide additional services or equipment, parents may be charged for this service at a level which reasonably reflects the cost to the School of providing the service.

5.0 Access to Curriculum

- 5.1 The BGS Junior School and Senior School site is spread over a 16-acre area, with a public road in between and incorporates several listed buildings. The School has some small playing fields in both the Junior and Senior School location with the main playing fields 3 miles away at Cople Fields. This means that, by its very nature, the site can be difficult to move around. Lifts, ramps and accessible WCs have been included in the more recent constructions, and conversions and future developments will take account of improving access for the physically and visually impaired.
- 5.2 In order to provide the best facilities for students, the School operates a system of broadly fixed classrooms for particular subjects. Students need to move between sites, classrooms, laboratories and specialist rooms. Whilst most of the estate is now accessible to those with mobility issues, there remain some areas and buildings without lifts.
- 5.3 During the life of this Accessibility Plan, the School will continue to improve access to its buildings subject to paragraph 4.4 above.
- 5.4 There is some scope to consider the needs of an individual student when the timetable is being created, but this will, by the nature of a complex timetable, be limited. The School will make best use of time-limited support for girls with additional needs to enable them to gain maximum benefit. In the shorter term, depending on the age of the student, it will seek to adjust the timetable and/or room allocation in such a way that, with additional support, students will be able to access the curriculum.
- 5.5 Most students stay at BGS for many years. It is possible that during their education a student may develop mobility issues or additional needs or they may become more serious. Continuing communication between parents and staff is vital for ensuring that reasonable adjustments are made to facilitate the student's participation in School.
- 5.6 If the School decides that it can no longer provide an environment suitable for the student to participate and thrive, it will consult with parents and where appropriate BGS will request and support the move of the student to another educational establishment.
- 5.7 BGS is established within the Harpur Trust and does not have a large financial base. All improvements to the School have to be funded from its activities and there are budgetary constraints on development and adaptations. If outside funding can be made available in advance, it may be possible for the School to advance its programme of access improvements or purchase additional specialist equipment or support for

individual students.

Examinations

- 5.8 All students are able to be accommodated to take examinations at Bedford Girls' School. Arrangements for examinations for students with additional needs are attached at Appendix 4.

Physical access and access to activities requiring manual dexterity.

- 5.9 The physical constraints limiting access to sports and other School facilities can be obtained from the Estates Manager. When booking an off-site facility, the School will check the accessibility for all students. Risk Assessments for trips and visits are prepared on a regular basis and take account of the particular needs of disabled students if required.
- 5.10 As part of the Fire Risk Assessment door opening and closing mechanisms and other adaptations have been considered to accommodate the needs of the whole BGS community.
- 5.11 As the School is redecorated, the lighting and colour contrast of finishes will be reviewed to aid orientation within the School.
- 5.12 As new furniture is required, consideration will be given to purchasing items of variable or flexible height.
- 5.13 The School has a number of designated disabled car parking spaces.

Outside contractors

- 5.14 When educational sessions are run by outside contractors, they will be made aware of students' additional needs. The School will provide detailed information and any assistance possible.

Trips and Visits

- 5.15 The school will continue to provide equal access to all school activities for all students, within the constraints of the physical nature of the site, the budgetary costs, the Health & Safety implications and difficulties of supervision. Individual Risk Assessment and management strategies will be provided for students with any physical or mental health requirements who are engaged in school trips or visits.
- 5.16 The medical needs of all students are considered carefully when deciding on residential trip locations, transport arrangements and whether extra support staff are required. This is part of the risk assessment process and it is carried out in full consultation with parents. For example, parents might attend a residential visit to assist a girl who might have need additional medical support requirements.

Review, Co-ordination & Communication

- 5.17 Access co-ordination is the responsibility of the DFO and the Deputy Head (Pastoral). They will consult with the other members of the Senior Leadership Team, the Head of Examinations, the Estates Manager, School Nurse, and others as appropriate.

Responsibilities include:

- To review each year the School's policies, procedures and facilities to maximise accessibility to the School by those with additional needs

- To make recommendations to improve accessibility by means of reasonable adjustments and by planning future improvements and by reviewing this plan
- To revise the Accessibility Plan
- To monitor the implementation of this Plan and to review as necessary, and at least every 3 years.
- In addition, the DFO will table an annual review of the plan by the School Committee of Governors.

Staff training

5.18 It is stipulated in the Code of Practice; “All teachers are teachers of children with learning support needs. 7% of children are deemed likely to have a learning support need”. All teaching staff are expected to have the skills required to teach students with additional educational needs and this is supported by a programme of Inset training on learning, medical needs and effective social support strategies. Consideration will be given to suitable training for non-specialist teachers and support staff.

Awareness of the Accessibility Plan

5.19 This Plan has been prepared by the School and endorsed by School Committee. Copies are disseminated to all teaching staff and those involved in the Admissions’ Process. Parents of existing students have been advised of this Plan via the School’s website and the School supplies written copies of this Plan to all who request it. Reference to this plan will be made in the School Admissions’ literature and copies are supplied on request. Copies are sent to all new members of the teaching staff electronically.

Communication Improvement

5.20 The School is committed to seek ways to improve access to information for users by:

	Targets	Strategies	Outcomes	Timeframe	Goals achieved
Short term	To improve communication with students/users.	To ensure the School website is clear, simple and easy to use.	Increased number of visits to website.	Ongoing upgrades of the School Website	Delivery of information to students/users
	To liaise with Academic/ Support /specialist staff with reference to different formats of information	To ensure parents and students have wider access to information	Increased variety of information available	From September 2022. Delivery of information to students improved	
	Improve accessibility of essential information to all users	Explore better use of technology	Increased availability, accessibility and awareness of essential information and routes to access	From September 2023	
Longer term	To consult with Disability	To increase levels of	Increased variety of	From 2024 onwards	Delivery of information to

	Targets	Strategies	Outcomes	Timeframe	Goals achieved
	Information Service about the best way to make information available to users	awareness amongst staff responsible for information	information available		students to improve further

Welfare

- 5.21 BGS is an inclusive School. Our ethos is of accepting and valuing differences. Our policies and systems of counselling and pastoral care support this approach. Our Equality & Diversity Policy for all members of the Bedford Girls' School community provide further guidance.
- 5.22 If any student feels excluded or subject to bullying, the School takes this very seriously. All students are made aware of the School's Anti-bullying Policy and are reminded regularly of it. Students are encouraged to speak to teachers or a trusted adult about any concerns, to feel empowered to challenge unfairness on their own behalf and on behalf of others. The PHSE curriculum addresses themes of self-esteem, peer pressure, individual strengths, rights and differences as well as specific topics of disability. School Nurses are available to be used by our girls to help with the difficult times that almost everyone faces at some point in their lives. They liaise with teachers with pastoral responsibilities, maintaining confidentiality.
- 5.23 Tutors and Form Teachers seek and receive feedback from staff on the girls' performance, and where concerns are expressed they address these problems directly with the girl and/or their parents and develop strategies to support them. Similarly, in the Junior School, the SENCo liaises regularly with Class teachers, subject specialists, support staff, parents and students. All BGS students have access to School Nurses for counselling.
- 5.24 If staff consider it appropriate, and after consultation with the Headmistress, they make recommendations to parents for a meeting with the appropriate level of Curriculum Support who may then advise a referral to an educational psychologist and/or other specialist. If students find it difficult to fulfil the full timetable of activities, staff in consultation with parents may consider a reduction in the number of subjects studied to allow time for greater personal study and/or learning support.

Diet and Medication

- 5.25 For an additional fee the School provides hot lunches to students. Within the limits of our catering facilities, a number of options are available and it is possible to accommodate the needs of many on special diets. Where this is not possible, girls may bring in a packed lunch which may be eaten in designated eating areas with other students.
- 5.26 The School employs a nursing staff who will give medication to students in accordance with written guidance from parents or guardians and in line with the Health Centre Policy. Medication can be refrigerated and stored securely. If a girl feels unwell, she can visit the Health Centre and seek assistance. Information on any medical condition should be provided to the School Nurse (preferably in writing) as soon as it is diagnosed so she can brief staff on any emergency procedures to be followed.

Access to Estate Facilities and Improvements made

- 5.27 The Cardington Road site was formerly occupied by Dame Alice Harpur School has a plan of alterations and adjustments to premises on the Junior and Senior school sites. Appendix 4 details the incremental improvements that have been made across the site.
- 5.28 Whilst the School will do whatever is reasonable to provide access to disabled students, there are contractual matters relating to Disability Access as an Independent Fee-Paying School. The following clauses are necessarily contained in the parent contract to protect the school from an uncapped liability to support students.

- 6.8 *Learning difficulties:*** *The School shall do all that is reasonable to detect and deal appropriately with a learning difficulty which is considered to be a "special educational need". The School staff are not, however, qualified to make a diagnosis of conditions such as those commonly referred to as dyslexia, or of other learning difficulties.*
- 6.9 *Screening for learning difficulties:*** *The screening tests available to schools are indicative only: they are not infallible. The Parents will be notified if a screening test indicates that the Pupil may have a learning difficulty. A formal assessment can be arranged by the School at the Parents' expense or by the Parents themselves. The Parents agree to cooperate fully with any investigation of the Pupil's educational needs.*
- 6.10 *Information about learning difficulties:*** *The Parents shall notify the Head when completing the School's Confidential Information Form and subsequently in writing at any time if they are aware or suspect that the Pupil (or anyone in her immediate family) has a learning difficulty and the Parents must provide the School with copies of all written reports and other relevant information. The Pupil's place will be cancelled, or, once the Pupil has started, Parents will be asked to withdraw the Pupil, without further charge if, in the professional judgement of the Head and after consultation with the Parents and with the Pupil (where appropriate), the School is unable to provide adequately for the Pupil's special educational needs. The School reserves the right to charge for the provision of additional teaching or auxiliary aids and service where it is lawful to do so.*

Appendices

- Appendix 1: The Definitions of Disability and Frequently Asked Questions
- Appendix 2: Examinations Procedures with respect to EQUALITY ACT
- Appendix 3: Charity Equality & Diversity Policy
- Appendix 4: Site Accessibility Improvements

Appendix 1 - The Definitions of Disability and Frequently Asked Questions

THE DEFINITIONS OF DISABILITY

This appendix is included to aid understanding about who is covered by the Act. A Government publication 'Guidance on matters to be considered in determining questions relating to the definition of disability' is also available from The Stationery Office.

When is a person disabled?

A person has a disability if he or she has a physical or mental impairment, which has a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities.

What about people who have recovered from a disability?

People who have had a disability within the definition are protected from discrimination even if they have since recovered.

What does 'impairment' cover?

It covers physical or mental impairments; this includes sensory impairments, such as those affecting sight or hearing.

Are all mental impairments covered?

The term 'mental impairment' is intended to cover a wide range of impairments relating to mental functioning, including what is often known as learning disabilities.

What is a 'substantial' adverse effect?

A substantial adverse effect is something, which is more than a minor or trivial effect. The requirement that an effect must be substantial reflects the general understanding of disability as a limitation going beyond the normal differences in ability, which might exist among people.

What is a 'long-term' effect?

A long-term effect of an impairment is one:

- which has lasted at least 12 months, or
- where the total period for which it lasts is likely to be at least 12 months, or
- which is likely to last for the rest of the life of the person affected.

Effects, which are not long-term, would therefore include loss of mobility due to a broken limb, which is likely to heal within 12 months and the effects of temporary infections, from which a person would be likely to recover within 12 months.

What if the effects come and go over a period of time?

If an impairment has had a substantial adverse effect on normal day-to-day activities but that effect ceases, the substantial effect is treated as continuing if it is likely to recur; that is if it is more probable than not that the effect will recur.

What are 'normal day-to-day activities'?

They are activities, which are carried out by most people on a fairly regular and frequent basis. The term is not intended to include activities which are normal only for a particular person or group of people, such as playing a musical instrument, or a sport, to a professional standard or performing a skilled or specialised task at work. However, someone who is affected in such a specialised way but is also affected in normal day-to-day activities would be covered by this part of the definition. The test of whether an impairment affects normal day-to-day activities is whether it affects one of the broad categories of capacity listed in Schedule 1 to the Equality Act 2010. They are:

- mobility
- manual dexterity
- physical co-ordination
- continence
- ability to lift, carry or otherwise move everyday objects
- speech, hearing or eyesight
- memory or ability to concentrate, learn or understand, or
- perception of the risk of physical danger.

What about treatment?

Someone with an impairment may be receiving medical or other treatment that alleviates or removes the effects (though not the impairment). In such cases, the treatment is ignored and the impairment is taken to have the effect it would have had without such treatment. This does not apply if substantial adverse effects are not likely to recur even if the treatment stops (i.e. the impairment has been cured).

Does this include people who wear spectacles?

No. The sole exception to the rule about ignoring the effects of treatment is the wearing of spectacles or contact lenses. In this case, the effect while the person is wearing spectacles or contact lenses should be considered.

Are people who have disfigurements covered?

People with severe disfigurements are covered by the Act. They do not need to demonstrate that the impairment has a substantial adverse effect on their ability to carry out normal day-to-day activities.

Are there any other people who are automatically treated as disabled under the Act?

Anyone who has HIV infection, cancer or multiple sclerosis is automatically treated as disabled under the Act. In addition, people who are registered as blind or partially sighted, or who are certified as being blind or partially sighted by a consultant ophthalmologist are automatically treated under the Act as being disabled. People who are not registered or certified as blind or partially sighted will be covered by the Act if they can establish that they meet the Act's definition of disability.

What about people who know their condition is going to get worse over time?

Progressive conditions are conditions, which are likely to change and develop over time. Where a person has a progressive condition they will be covered by the Act from the moment the condition leads to an impairment which has some effect on the ability to carry out normal day-to-day activities, even though not a substantial effect, if that impairment is likely eventually to have a substantial adverse effect on such ability.

Are people with genetic conditions covered?

If a genetic condition has no effect on the ability to carry out normal day-to-day activities, the person is not covered. Diagnosis does not in itself bring someone within the definition. If the condition is progressive, then the rule about progressive conditions applies.

Are any conditions specifically excluded from the coverage of the Act?

Yes. Certain conditions are to be regarded as not amounting to impairments for the purposes of the Act. These are:

- addiction to or dependency on alcohol, nicotine, or any other substance (other than as a result of the substance being medically prescribed).
- seasonal allergic rhinitis (e.g. hay fever), except where it aggravates the effect of another condition
- tendency to set fires
- tendency to steal
- tendency to physical or sexually abuse of other persons
- exhibitionism
- voyeurism.

Also, disfigurements which consist of a tattoo (which has not been removed), non-medical body piercing, or something attached through such piercing, are to be treated as not having a substantial adverse effect on the person's ability to carry out normal day-to-day activities.

Appendix 2 - EXAMINATIONS PROCEDURES – DISABLED ACCESS

Access Arrangements & Special Needs

- At any stage in their school career, a student can be referred to SENDCo for assessment.
- If there is a history of need, SENDCo assesses candidates before their Year 10 internal examinations to ascertain whether the candidate is eligible for extra time in some or all of the examinations.
- These decisions are finalised by the end of April at the latest for girls to have extra time allocated for their Year 10 examinations.
- SENDCo liaises with the Examinations Officer over alterations to the rules that have been made by Awarding Bodies regarding Access Arrangements during the Autumn Term.
- These are then considered when planning examination rooms and invigilation.
- For external examinations SENDCo arranges, in consultation with parents, for necessary testing so that the paperwork is in place for January modules by the end of November.
- For candidates taking examinations in May and June, the certification of need documentation should be in place by February in order that any special arrangements can be put in place.
- The Examinations Officer consults the Awarding Bodies if there is any query over the implementation of Access Arrangements.
- The Examinations Officer with responsibility for Access Arrangements sees the candidates affected before each examination season to inform them of the measures put in place for them.
- A grid of girls with access arrangements is prepared for the main examination rooms. Colour coding shows how much extra time each candidate is eligible for in each subject.

Since the Examinations policy was written, additional access arrangements have been put in place where an extra time candidate has more than three hours of examinations in one session. In consultation with the candidate(s) involved, one exam can be moved to the other session during the day, with the candidates being supervised at the appropriate times to ensure security of the papers is not breached. Candidates are informed in writing of the arrangements made.

Access Arrangements made in the past - Access arrangements made in the past for candidates include:

- Up to 25% extra time
- Supervised rest breaks
- Enlarged papers
- Use of a word processor
- Use of a bilingual dictionary
- Prompter
- Seating by the exit and/or special seating for candidates with mobility difficulties or health problems.
- Practical assistant in a Chemistry practical examination
- Separate rooms for sub-vocalising candidates

Disabled Access to Examination Venues

- External Examinations not requiring specialist equipment are normally held in the Assembly Hall or Sports Hall.
- The Assembly Hall has disabled access from the car park and a disabled toilet is just off the corridor outside the Assembly Hall, by reception.
- At present, the Sports Hall does not have independent access and egress for a physically disabled user.
- Chairs are available outside all examination rooms.
- Emergency evacuation procedures from the Assembly Hall are discussed in the Examinations briefing held with all external examination candidates before the examination period.
- Those candidates not present must look at the PowerPoint presentation from the briefing on the school intranet.
- Emergency evacuation from the Assembly Hall is via a disabled access route.

Informing Invigilators

- Medical details of all external examination candidates are supplied for each examination with the examination papers.
- If a candidate requires medication during an examination, a school nurse is called to administer the medication.
- Invigilators are supplied in advance with a booklet of instructions for conducting examinations, which contains information on the above matters.
- Invigilators attend an examination briefing in which they have the opportunity to ask questions regarding the detail of the instructions.



The Harpur Trust

Equality & Diversity Policy

Policy Statement

The Trust is committed to the promotion of equal opportunities, valuing and encouraging diversity and the creation of an inclusive working environment for all employees / workers¹, and opposes all forms of irrelevant and unlawful discrimination, including discrimination on the basis of age, sex, marriage and civil partnership, gender reassignment, race, disability, sexual orientation, religion or belief, pregnancy and maternity (the nine Protected Characteristics defined in the Equality Act 2010). (See Appendix 1).

We are committed to employing the best person for the job and to ensuring that employees are treated equally and fairly. All policies and practices will seek to conform to the principle of equal opportunities in terms of recruitment, selection, training, promotion, career development, discipline, redundancy and dismissal. (See Appendix 2).

Ensuring that the work environment is free of harassment and bullying and that everyone is treated with dignity and respect is an important aspect of delivering equal opportunities in employment. The Trust has a separate dignity at work policy, which deals with these issues should they occur.

Scope

Application. This policy applies the Trust's employees, job applicants and volunteers who work within the Trust and its schools. It is not contractual and may be varied at the Trust's discretion. Breaches of this Policy will be regarded as misconduct and could lead to disciplinary proceedings.

Employees' responsibilities. All employees have a duty to act in accordance with this policy, to treat colleagues with dignity at all times, and not to discriminate against, harass or victimise other members of staff, whether junior or senior to them.

¹ Trust's employees, whether permanent, temporary, casual, part-time or on fixed-term contracts, agency staff, consultants and volunteers.

Trustees' Responsibilities. The Trust will not tolerate any discriminatory practices or behaviours and in some situations may be at risk of being held responsible for the acts of individual employees. The Trust therefore commits to the following actions to achieve the aims of this policy:

- Providing awareness training and guidance to workers, as appropriate
- Challenging and investigating any allegations of discriminatory behaviour
- Supporting the communities in which we live and work to ensure that we are accessible and involved

Measuring policy effectiveness

Some of the ways the Trust will measure the effectiveness of its policy are:

- Collating and reviewing quantitative and qualitative data to identify any areas requiring action
- Benchmarking against other organisations where relevant

Monitoring and review

This policy will be monitored periodically by the Trust to judge its effectiveness and will be updated in accordance with changes in the law

Information provided by job applicants and employees for monitoring purposes will be used only for these purposes and will be dealt with in accordance with the Data Protection Act 1998.

Appendix 1 – Unlawful discrimination

Types of unlawful discrimination

Direct discrimination is where a person is treated less favourably than another because of a protected characteristic. An example of direct discrimination would be refusing to employ a woman because she is pregnant.

In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity) that has the purpose or effect of violating a person's dignity; or creating an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and (according to guidance from the Government and Acas) pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that he/she has a particular protected characteristic when he/she does not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Third-party harassment occurs where an employee is harassed and the harassment is related to a protected characteristic (other than marriage and civil partnership, and pregnancy and maternity), by third parties such as clients or customers. For an employer to be liable:

- the harassment must have occurred on at least two previous occasions (although not necessarily by the same harasser or suffering the same type of harassment);
- it must be aware that the previous harassment has taken place; and

- it must have failed to take reasonable steps to prevent harassment from happening again.

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because he/she made or supported a complaint or raised a grievance under the Equality Act 2010, or because he/she is suspected of doing so. However, an employee is not protected from victimisation if he/she acted maliciously or made or supported an untrue complaint. There is no longer a need for a complainant to compare his/her treatment with someone who has not made or supported a complaint under the Equality Act 2010. For example, if a blind employee raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that protected characteristic and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Equal opportunities in employment

The Trust will avoid unlawful discrimination in all aspects of employment including recruitment, promotion, opportunities for training, pay and benefits, discipline and selection for redundancy.

Recruitment and selection. The Trust aims to ensure that no job applicant receives less favourable treatment because of a Protected Characteristic. Recruitment procedures will be reviewed regularly to ensure that individuals are treated on the basis of their relevant merits and abilities. Job selection criteria are reviewed from time to time to ensure that they are justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

Monitoring. To ensure that this policy is operating effectively with respect to recruitment and selection, the Trust monitors applicants in terms of age, disability, ethnic origin, gender and sexual orientation during the recruitment procedure (where applicants are willing to provide this information). We also maintain records of this data in an anonymised format solely for the purposes stated in this policy. Ongoing monitoring and regular analysis of the data provide the basis for taking appropriate steps to eliminate unlawful discrimination and implement this policy.

Staff training and promotion. Training needs shall be identified through the performance management process. All workers will be given fair access to training that is relevant for their role. All promotion decisions shall be made on the basis of merit.

Terms and conditions of employment. Our conditions of service, benefits and facilities will be reviewed from time to time to ensure that they are available to all workers who should have access to them and that there are no obstacles to accessing them.

Disability discrimination. If someone is disabled, or becomes disabled in the course of their employment, we will encourage them to tell us about their condition. This is to enable us to support employees as much as possible and to ensure that they are able to continue to contribute to the Trust to the best of their ability.

Reasonable adjustments. On being informed of an employee's disability, the Line Manager and/or Human Resources professional will talk to the employee about reasonable adjustments to working conditions or the duties of the job, which may be considered necessary and proportionate to assist the employee in the effective and efficient performance of their duties. This may involve the provision of an additional piece of equipment or assistance in helping the employee to perform their work. If it is

decided that it is not reasonable for us to accommodate the suggested adjustments we will ensure that the employee is fully informed as to the basis of our decision not to make any adjustments.

Employees' responsibilities. Every employee is required to assist the Trust to meet its commitment to provide equal opportunities and diversity in employment and avoid unlawful discrimination.

Employees can be held personally liable as well as, or instead of, the Trust for any act of unlawful discrimination. Employees who commit serious acts of harassment may be guilty of a criminal offence.

Acts of discrimination, harassment, bullying or victimisation against employees or customers are disciplinary offences. They will be dealt with under the Trust's disciplinary procedure and may constitute gross misconduct and could lead to dismissal without notice.

Complaints. If an employee considers that they may have been discriminated against, they may use the Trust's grievance procedure to make a complaint. If the complaint involves bullying or harassment, employees are encouraged to raise the matter through the Trust's Dignity at Work policy.

The Trust will take any complaint seriously and will seek to resolve any grievance that it upholds. Employees will not be penalised for raising a grievance, even if the grievance is not upheld, unless the complaint is both untrue and made in bad faith.

Customers, suppliers and other people not employed by the Trust

The Trust will not discriminate unlawfully against customers using or seeking to use goods, facilities or services provided by the Trust.

Employees of the Trust should report any bullying or harassment by customers, suppliers, visitors or others to their line manager or Human Resources professional who will take appropriate action.

Appendix 4 – Site Improvements

Improvements 2003 to 2009 (DAHS Disability Access Plans)

1.1 In 2003 the following subject classrooms were already accessible:

- Drama
- Design Technology
- Art & Textiles
- Biology
- PE (Gymnasium/ Fitness Suite)
- Chemistry
- Library
- Assembly Hall
- Classrooms 1-6 (Maths, English, Classics)
- Cloakrooms
- Randle Hall
- Coach House

In 2003, the following subject areas were not accessible:

- PE (Sports Hall)
- Swimming Pool
- Physics
- Geography
- Information Tech
- Howard House
- Languages
- Sixth Form House
- History
- Food Tech
- Senior Leadership Team offices
- Careers
- Kilpin House
- Wing House - Music
- Religious Studies

1.2 During the period 2003 to 2011, the following access improvements have been made to the estate.

(i) In 2005, two Stannah passenger lifts (and a disabled toilet) were installed in the Art & Textiles area, thereby allowing access to the entire first floor of the main school (with the exception of the SLT corridor and assembly hall balcony). This provided full access to the following areas:

- Physics
- Geography
- Religious Studies
- Information Tech
- History
- Languages
- Food Tech

(ii) In 2005, a ramp was installed on the ground floor of Howard House, thereby providing whole ground floor access to Howard House, so long as entrance was via the Randle Hall entrance.

- Howard House Ground Floor

(iii) In 2006, a platform lift and a passenger lift (and a disabled toilet) were installed in Bedford Girls' School House as part of the Sixth Form development project, thereby providing access to the following subject areas:

- Sixth Form House (Rooms S1 to S9, Common Room, Media Suite & Cafeteria)
- Careers

1.3 During 2007, an additional door was added to the Sports Hall to comply with changes in Fire Regulations. As part of the planning process for this door, we commissioned our architects to design a suitable ramp for wheelchair access to the Sports Hall. It was noted that due to the substantial elevations of the Sports Hall above river level that the ramp would need to be excessively long to accommodate the appropriate gradient. On the basis of excessive cost and the fact that this would not solve the changing room facility issue noted above, the inclusion of the ramp was not approved.

1.4 In summer of 2011, Bedford Girls' School undertook a remodeling of some of the external spaces within the core area of the school. Whilst most of the work was decorative and seeking to better use lost spaces (cupboards etc), the School employed a DDA/EA2010 consultant to ensure compliance. 2 new buildings were also purchased and converted. However, listing and planning restrictions on these buildings prevented significant improvements to existing access arrangements.

1.5 In 2013, a wheelchair access ramp was built from the front car park through to School Office to allow a wheelchair user better access to the front of the building and to facilitate easy threshold access for other users.

1.6 In 2015, a two-story clubhouse was built at Cople Fields which provides Six Lacrosse Pitches. That building has a full disabled user platform lift to access all areas of the first floor as well as disabled toilet facilities on the ground floor.

1.7 In 2019, two science classrooms that has a stepped threshold were refurbished and ramped access provided to remove the step.

1.8 In 2021, the main school reception doors were reoriented to allow simpler access for disabled stakeholders to access the school's reception disabled toilet facilities.

1.9 In 2022, as part of the Sixth Form Common Room remodeling, an access ramp has been added to the Sixth Form Common Room Cardington Road entrance to improve accessibility.

1.10 **Remaining Accessibility Work** – The following areas have been identified for this Disability Access Plan 2022-2025, only the following areas remain inaccessible by disabled users on an independent basis:

- Senior Leadership Team offices / Staff Common Room
- Swimming Pool
- Kilpin House
- Sixth Form House
- PE (Sports Hall)
- Howard House (first and second floors only)
- Wing House

(i) Sixth Form House Rooms – these were considered for disability access inclusion as part of the Sixth Form Centre development. Due to their location on the top floor of Dame Alice House, it was agreed that the gradient required to access these rooms by way of a ramp produced unacceptable health and safety risks. In addition, the complex engineering required to introduce platform lifts to access these four rooms and the associated costs, significantly outweighed the benefit. No work is therefore planned to provide disabled access to these four rooms in the future.

- (ii) Howard House and Kilpin House – these two listed buildings have disabled access to the ground floors only of each building. The listed nature of these buildings, the complex layout of the buildings and the associated costs to provide full access solutions to the upper floors is not planned for in the short term. Any alteration to the building as part of a substantial capital project would include disabled access as part of that project. No work is therefore currently planned to provide disabled access at the moment.
- (iii) Wing House – this listed building is extremely complex in layout and at present, very little access is afforded to the disabled user. In reality, the only improvements to the access would be as part of a major capital alteration project.
- (iv) Swimming Pool Area – the fabric of the estate in the swimming pool area is such that all the changing room door frames would need to be replaced. In addition, disabled toilets and showers would need to be introduced as well as poolside lift equipment. Whilst feasible, this would constitute a major construction project, which could not be managed within the school’s current funding profile.

Senior Leadership Team Offices/ Staff Common Room – ramp access or passenger lift access will be investigated during 2022 to 2025.