



Accessibility Policy

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Statement of intent

Rivers ESC is committed to taking all reasonable steps to avoid placing any individuals with disabilities at a disadvantage, and works closely with disabled pupils, their families and any relevant outside agencies in order to remove any potential barriers to their learning experience.

This policy outlines the principles that the school is committed to following throughout all accessibility planning activities to ensure that all disabled pupils are able to enjoy and access all aspects of educational life in the same way as other colleagues. The specific measures the school has taken to ensure the school is accessible are outlined within the [Accessibility Plan](#).

The ways in which the school fosters inclusion and equality for pupils who share other protected characteristics are outlined in the [Pupil Equality, Equity, Diversity and Inclusion Policy](#), and the ways in which the school ensures its practices and environments are accessible.

This policy must be adhered to by all staff members, pupils, parents and visitors.

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- United Nations Convention on the Rights of the Child
- United Nations Convention on the Rights of Persons with Disabilities
- Human Rights Act 1998
- The Special Educational Needs and Disability Regulations 2014
- Education and Inspections Act 2006
- Equality Act 2010
- The Education Act 1996
- The Children and Families Act 2014
- The Equality Act 2010 (Specific Duties and Public Authorities) Regulations 2017
- DfE (2014) 'The Equality Act 2010 and schools'
- DfE (2015) 'Special educational needs and disability code of practice: 0 to 25 years'

This policy operates in conjunction with the following school policies:

- Equality and Diversity Policy and Statement
- Special Educational Needs and Disabilities (SEND) offer
- SEND Policy
- Equality, Equity, Diversity and Inclusion Policy
- Admissions Policy
- Behaviour Policy
- Supporting Pupils with Medical Conditions Policy
- Anti-bullying Policy
- Teaching and Learning Policy
- Health and Safety Policy
- School Development Plan
- Data Protection Policy

2. Definitions

In line with the Equality Act 2010, “**indirect discrimination**” is defined as where a provision, criterion or practice is discriminatory in relation to a person’s protected characteristics, where:

- The provision, criterion or practice applies, or would apply, to people without those protected characteristics.
- It puts, or would put, people with those protected characteristics at a disadvantage compared to those without.
- The school cannot show that the provision, criterion or practice is a proportionate means of achieving a legitimate aim.

The “**protected characteristics**” are: age, disability, gender reassignment, race, religion or belief, sex or sexual orientation, pregnancy or maternity, marriage or civil partnership, additional needs. See link below or Appendix A for further guidance on Gender Recognition - [What the Supreme Court's Ruling on 'Sex' Means for Schools - Edapt](#)

A person is defined as having a “**disability**” if they have a physical or mental impairment that has an adverse, substantial and long-term effect on their ability to carry out normal day-to-day activities.

3. Roles and responsibilities

The management committee will be responsible for:

- Ensuring that all accessibility planning, including the school’s Accessibility Plan, adheres to and reflects the principles outlined in this policy.
- Approving this policy and the Accessibility Plan before they are implemented.
- Monitoring this policy and the Accessibility Plan.

The headteacher will be responsible for:

- Creating an Accessibility Plan with the intention of improving the school’s accessibility, in conjunction with the management committee and in line with the school’s legal obligations and the principles outlined in this policy.
- Ensuring that staff members are aware of pupils’ disabilities and medical conditions where necessary.
- Establishing whether a new pupil has any disabilities or medical conditions which the school should be aware of.
- Consulting with relevant and reputable experts if challenging situations regarding pupils’ disabilities arise.
- Working closely with the management committee, LA and external agencies to effectively create and implement the school’s Accessibility Plan.

The SENCO will be responsible for:

- Working closely with the headteacher and management committee to ensure that pupils with SEND are appropriately supported.
- Ensuring they have oversight of the needs of pupils with SEND attending the school, and advising the headteacher in relation to those needs as appropriate.

Staff members will be responsible for:

- Acting in accordance with this policy and the Accessibility Plan at all times.
- Supporting **pupils with a disability/additional needs** to access their environment and their education wherever necessary, e.g. by making reasonable adjustments to their practice.
- Ensuring that their actions do not discriminate against any pupil as a result of their disability/**additional needs**.

All staff members and governors will partake in whole-school training on equality issues related to the Equality Act 2010. Designated staff members will be trained to effectively support pupils with medical conditions.

Accessibility Plan

The school's Accessibility Plan demonstrates how access will be improved for pupils, staff, parents and visitors to the school within a given timeframe.

It will be presented as a freestanding document and is available on the school website.

The Accessibility Plan will be structured to complement and support the school's Equality Information and Objectives Policy, as well as the Special Educational Needs and Disabilities (SEND) Policy.

The plan has the following key aims:

- To increase the extent to which disabled pupils can participate in the curriculum
- To improve and maintain the school's physical environment to enable disabled pupils to take advantage of the facilities and education on offer
- To improve the availability and delivery of written information to disabled pupils, in particular that which has already been produced for pupils who are not disabled.

The intention is to provide a projected plan for a three-year period ahead of the next review date, which will be 2026. If it is not feasible to undertake all the plans during the lifespan of the Accessibility Plan, some items will roll forward into subsequent plans. The school will provide adequate resources for implementing plans, ensuring pupils are sufficiently supported.

The Accessibility Plan will be used to measure where reasonable adjustments need to be made in order to accommodate the needs of people with disabilities. It will be used to advise other school planning documents and will be reported upon annually in respect of progress and outcomes.

The school will collaborate with the LA in order to effectively develop and implement the plan. The LA will prepare accessibility strategies based on the same principles as the school's Accessibility Plan. The LA will also provide auxiliary aids and services where necessary to help the school provide suitable support to pupils with disabilities.

An access audit will be undertaken by the management committee annually.

During Ofsted inspections, the inspectorate may include the school's Accessibility Plan as part of their review. Both this policy and the Accessibility Plan will be published on the school website.

4. Equal opportunities

The school strives to ensure that all existing and potential pupils are given the same opportunities, and is committed to developing a culture of inclusion, support and awareness. The Accessibility Plan will detail any barriers which are hindering the opportunities for pupils with SEND. The aim of the plan is to take appropriate measures in order to overcome these barriers, allowing all pupils equal opportunities.

Staff members will be aware of any pupils who are at a substantial disadvantage due to their SEND and will take the appropriate steps to ensure the pupil is effectively supported.

Wherever possible, teaching staff will adapt their lesson plans and the curriculum to allow all pupils to reach their full potential and receive the support they need. The school will ensure that all extracurricular activities are accessible to all pupils and make reasonable adjustments to allow pupils with SEND to participate in all school activities.

5. Admissions

The school will act in accordance with its Admissions Policy. The same entry criteria will be applied to all pupils and potential pupils.

The school will strive to not put any pupil at a substantial disadvantage by making reasonable adjustments prior to the pupil starting at the school. All pupils, including those with SEND, will have appropriate access to all opportunities available to any member of the school community.

Information will be obtained on future pupils in order to facilitate advanced planning. Prospective parents of statemented pupils, and pupils with SEND, are invited to a transition meeting prior to the pupil starting school in order to discuss the pupil's specific needs.

6. Curriculum

The school is committed to providing a healthy environment that enables full curriculum access and values and includes all pupils regardless of their education, physical, sensory, social, spiritual and emotional needs. No pupil will be excluded from any aspect of the school curriculum due to their disability. The school aims to provide a differentiated curriculum to enable all pupils to feel secure and make progress.

The subject lead and the SENCO will work together to ensure that the pupil's EHC plan is implemented, and that the teaching of that subject is adjusted for the pupil wherever necessary in line with their EHC plan. Where any amendments to the provisions of the plan need to be amended or adapted to allow the pupil to reach their full potential in a given subject, advice will be sought from outside agencies where necessary.

Where areas of the curriculum present challenges for a pupil, these will be dealt with on an individual basis. The class teacher, in discussion with the pupil and their parents, will ensure that all adjustments possible, in line with common sense and practical application, will be made for any disability.

Curricular activities involving physical activity or exercise, e.g. PE lessons, will be adapted, wherever necessary and possible, to ensure disabled pupils can participate in a valuable way in lessons.

There are established procedures for the identification and support of pupils with SEND in place at the school. Detailed pupil information on pupils with SEND are given to relevant staff in order to aid teaching, e.g. 'pupil passports', Provision map, Tracking minutes, Teaching and Learning plans for those with EHCPs, SEND in a Nutshell, EHCP half-termly reviews

The school ensures that specialist resources – including physical resources, e.g. large-print books, and human resources, e.g. learning support assistants – are available and

appropriately deployed for pupils who require or would benefit from them to fully participate in the curriculum.

7. Physical environment

The school is committed to ensuring that all pupils, staff members, parents and visitors have equal access to areas and facilities within the school premises and reasonable adjustments have been made where possible. There are some limitations to parts of the KS3 site to which pupils with disabilities have limited or no access to due to the age, listed status and layout of the building. The KS4 centre and Phoenix centre are fully wheelchair accessible, however, the MEWS building is not wheelchair accessible

The school has toilet facilities suitable for people with disabilities which are fitted with a handrail and an emergency pull cord.

Wide doors are fitted throughout the school to allow for wheelchair access where possible at all three sites.

The school will ensure that accessibility audits are conducted for those within the school community to ensure that specific needs are taken into account; however, in general, the school will make its best endeavours to anticipate potential access needs that may be encountered in the future and to ensure that the physical environment is as accessible as possible for all current and prospective pupils.

The specific ways in which the school will ensure its physical environment is accessible in full to all members of the school community, irrespective of any protected characteristics, are detailed within the school's Accessibility Plan.

8. Monitoring and review

This policy will be reviewed on an annual basis or when new legislation or guidance concerning equality and disability is published. The management committee and headteacher will review the policy in collaboration with the SENCO.

Equality impact assessments will be undertaken as and when school policies are reviewed.

Appendix A

What the Supreme Court's Ruling on 'Sex' Means for Schools

(source: [What the Supreme Court's Ruling on 'Sex' Means for Schools - Edapt](#))

UPDATE 25th April: This article was originally published on 17th April but has since been updated to take into account the additional commentary and updates coming from the [Equalities and Human Rights Commission \(EHRC\)](#) and the government. As part of our apolitical stance, Edapt does not take a position on whether the Supreme Court's ruling is right or wrong. Our role is to support school staff by helping them understand what is a complex and evolving area of law, and to offer guidance on how it may apply in their professional context, particularly where duties intersect and safeguarding considerations arise. We are not prescribing what schools should do. Instead, we aim to provide clear, practical support rooted in the law as it currently stands, to help teachers and school leaders make informed decisions. Our guidance aims to help schools and teachers think about those responsibilities lawfully and fairly, while avoiding unlawful discrimination.

1. A brief explanation of the ruling

On 16th April 2025, the [UK Supreme Court delivered a landmark ruling](#) in *For Women Scotland Ltd v The Scottish Ministers*, clarifying that the term “sex” in the Equality Act 2010 refers to biological sex, not the legal gender recorded on a Gender Recognition Certificate (GRC). This ruling settles years of legal ambiguity about whether individuals with a GRC, whose legal sex differs from their biological sex, should be treated as having changed sex under equality law.

The case itself related to the definition of “woman” in Scottish public sector board appointments, but the implications extend across England, Scotland and Wales, including to schools, which are bound by the Equality Act.

In the UK, an individual can apply for a Gender Recognition Certificate (GRC) at the age of 18 or over. Since children under 18 cannot obtain a GRC, the ruling applies directly and fully to almost all pupils in schools, as their legal sex and biological sex are always the same in law. This means that:

There is no legal ambiguity about their sex under the Equality Act. A pupil's sex in law is their biological sex at birth, regardless of how they identify. Even if a child socially transitions or intends to apply for a GRC in future, this has no effect on how the law recognises their sex

For clarity, the Equality Act 2010 has not changed. However, the Supreme Court has now made clear that sex under the Equality Act should not be interpreted to mean gender identity but should only apply the definition as determined by biological sex. The knock on effect therefore comes into other laws and regulations where sex is a key feature for example the School Premises Regulations 2012 that refer to single-sex spaces.

2. What has the government said in relation to the ruling?

Speaking on Radio 4 on 22nd April Bridget Phillipson (Secretary of State for Education and Minister For Women and Equalities) said that the government welcomes the ruling and will make sure that the EHRC will work with them to bring forward guidance and a statutory code of practice to address those areas and provide further clarity. When pressed on which toilets a trans individual should use, she confirmed that it should be the one relating to “biological sex”. She also said that the Department for Education will publish revised gender-questioning guidance for schools this year to provide that necessary further clarity.

On 25th April the [EHRC provided an interim update on the practical implications of the judgment](#) including a small section on schools. They have confirmed that formal guidance will be published at a later date but have not confirmed the timescale for such.

3. How the ruling is being interpreted

The Supreme Court’s ruling has prompted a range of responses from across the education and legal landscape.

Some have argued that the ruling now requires schools to exclude all trans pupils from single-sex spaces and services, and that any inclusion would breach the School Premises Regulations. This interpretation holds that single-sex provision can only be upheld by categorically excluding those of the opposite biological sex in every circumstance.

Others have taken a contrasting view, that the ruling should not affect inclusive practices at all, and that trans pupils should always be permitted to access the spaces and activities that align with their gender identity. This position tends to see exclusion of trans pupils as inherently discriminatory or harmful, and views the Equality Act’s protection for gender reassignment as a primary consideration in all cases.

Edapt’s guidance sits slightly between these perspectives. It reflects the legal framework as it currently stands, which require schools to provide single-sex spaces based on biological sex . However, it also acknowledges where competing duties and responsibilities may require schools to make exceptions in extraordinary circumstances, which we detail below. That said, our message is clear that further

practical guidance from the Department for Education is needed to help school leaders and to clarify the legal position to their school communities.

4. A rebalancing of inclusion

The Court's decision introduces a key shift: schools and other public institutions must now apply the definition of sex in the Equality Act 2010 as biological sex. This reaffirms the legal rights of girls and boys, as biological categories, and provides a clear basis for maintaining single-sex spaces, activities, and sports.

Transgender pupils are still protected under the characteristic of gender reassignment and must not be harassed or unfairly excluded. However, schools are no longer required to stretch or reinterpret the meaning of "sex" to accommodate gender identity within spaces that are lawfully designated for one biological sex.

Importantly, the Equality Act continues to apply alongside this ruling. Where a space has been lawfully designated as single-sex under Schedule 3, schools are entitled, and, in light of the updated EHRC guidance, advised, to restrict access to pupils of the same biological sex. This exclusion does not require a separate proportionality test under the Equality Act. It follows automatically from the lawful designation of the space.

While the Supreme Court ruling gives schools greater legal certainty to operate spaces based on biological sex, it does not create a blanket requirement to exclude trans pupils from all areas of school life. However, where facilities are provided on a single-sex basis, such as toilets, changing rooms, and overnight accommodation, access must now be restricted based on biological sex unless there is a clear, exceptional reason to permit otherwise.

If a school does exceptionally decide to permit access by a pupil of the opposite biological sex (for example, during a temporary emergency), that decision must be:

- clearly justified,
- carefully documented,
- strictly time-limited, and
- must not undermine the overall legal status of the single-sex provision.

Schools are required under the Premises Regulations to provide single-sex toilets for pupils over the age of 8, and single-sex changing facilities over the age of 11. Once provided, these spaces are considered legally single-sex and should be consistently maintained as such.

Maintaining the clarity and integrity of single-sex provision is not only lawful, it is now a legal requirement under the School Premises (England) Regulations 2012 and the Equality Act 2010.

5. How will this practically impact schools?

There are a number of ways that this is likely to impact how schools will operate. Including the following:

6. **Toilets and changing rooms:** In line with the Equality and Human Rights Commission's clarification, schools should not permit pupils to use opposite-sex (as defined by biological sex) toilets or changing facilities. Suitable alternative provision should be made available where required. Schools are legally required to provide separate toilet and washing facilities for boys and girls over the age of 8 under the School Premises (England) Regulations 2012. These facilities are designated for use by pupils of the same biological sex. If a school is considering allowing a trans pupil access to a facility designated for the opposite sex, this must be approached with caution. Any such inclusion must be clearly justified, done as an exception and schools must be aware that doing so may affect the facility's legal status as a single-sex space.
7. **Competitive sport:** Girls' and boys' teams may be separated by biological sex, particularly in contact or performance-based sports.
8. **Positive action programmes:** Initiatives designed to promote gender equality (e.g. STEM clubs for girls) must be based on biological sex.
9. **Admissions policies** (especially in single-sex schools): The ruling confirms that these may lawfully use biological sex as the basis for entry.
10. **Staff decisions:** Roles involving intimate care or safeguarding (e.g. boarding houses) may now be lawfully designated by sex-at-birth.

11. Do trans pupils have to now be excluded from single sex spaces or activities?

The Supreme Court ruling clarified that single-sex spaces must be based on biological sex, not gender identity or acquired gender through a GRC. Where a facility has been lawfully designated as single-sex, for example, a girls' changing room, schools are permitted, and indeed expected, to exclude pupils of the opposite biological sex in order to maintain the legal status of the space. Exclusion in these circumstances does not constitute unlawful discrimination and does not require a case-by-case proportionality assessment.

The ruling does not say that trans pupils must be excluded in *all* circumstances without exception. In rare or exceptional cases, for instance, where no alternative

provision is available temporarily, a school may consider whether a carefully justified, necessary, and time-limited inclusion is appropriate. However, any such decision must be recorded, proportionate, and must not undermine the school's duty to maintain appropriate single-sex provision overall.

Inclusion is not explicitly prohibited, but it is not the expected norm either. Schools must weigh any proposed inclusion carefully against safeguarding, privacy, and the rights of other pupils, ensuring that the integrity of single-sex provision is preserved. The ruling provides schools with greater clarity and legal confidence to manage these decisions thoughtfully and lawfully.

12. What practical steps should schools be taking now?

First of all, don't rush anything! These are not simple decisions and if anything the ruling highlights the importance of considered and documented reasoning. That said schools are likely going to have to:

1. **Review and update policies:** Behaviour, uniform, equality, safeguarding, sport, and facilities policies should reflect the biological definition of sex.
2. **Train staff:** Ensure all staff understand the protected characteristics of "sex" and "gender reassignment", and how they interact.
3. **Document decisions:** Particularly in sensitive cases, record the rationale, legal basis, and any safeguarding considerations.
4. **Update pastoral support plans:** Tailor arrangements for trans pupils with dignity and discretion.
5. **Engage governors and parents (where appropriate):** Prepare consistent messaging that focuses on fairness, safety, and respect for all.

The ruling does not remove nuance. Schools must continue to weigh each situation based on a number of factors including:

- The age and maturity of pupils involved
- The specific facilities available
- Safeguarding or privacy concerns
- Whether any exclusion is the *least discriminatory option available*

This does not mean schools are expected to redefine single-sex provision or abandon safeguarding. Where spaces are lawfully designated by biological sex, schools should exclude pupils of the opposite sex.

Policies should provide clear expectations while allowing for limited flexibility in exceptional circumstances. A one-size-fits-all approach is unlikely to be legally or practically sound, but any departure from a school's established framework should be rare, necessary, and clearly documented

A case-by-case approach does not mean inconsistent decision-making. Schools should develop a clear framework for how such cases will be assessed and ensure that similar cases are treated in similar ways, based on documented evidence and legal principles.

13. Unresolved issues and ongoing challenges

Whilst the ruling does provide some clarity to schools, there are number of issues that still remain unresolved and the practical implementation of the law will still be challenging. For example, in the case of facilities, many schools lack enough space for private or alternative changing and toilet provision. Some schools, especially those with strong inclusive or faith-based values, may struggle to reconcile legal clarity with community expectations. Without centralised guidance, schools risk inconsistency, complaints, or legal challenge.

This is why we think it is sensible for the DfE to consider issuing national guidance that:

- Clarifies how the ruling applies to the school context
- Offers practical models for balancing rights
- Addresses unresolved questions (e.g. safeguarding, parental objections and school sports)

Without clear national guidance, schools risk facing disproportionate legal and operational pressures, demands that would challenge even trained equalities lawyers, let alone busy school leaders.

Some practical case study applications of the ruling:

14. Case Study 1: A trans pupil and changing room access

Scenario: Chloe is a Year 10 pupil, biologically male but living as a girl since Year 8. Her parents request that she be allowed to use the girls' changing room for PE.

School's response: The school considers the request and explains the requirements of the School Premises Regulations, which require the provision of separate single-sex facilities based on biological sex. They offer Chloe the use of a private changing cubicle near the PE office, balancing privacy, dignity, and safeguarding for all pupils. The decision is documented and reviewed annually to ensure consistency and clarity across the staff team.

Legal position: The exclusion is lawful because the facility is a lawfully established single-sex space. Schools are entitled to restrict access based on biological sex under the Equality Act. No separate proportionality assessment is required for exclusion, but the school's rationale should be documented carefully to ensure transparency, consistency, and fairness.

15. Case Study 2: A trans boy in competitive sport

Scenario: Max is a trans boy (biological female) in Year 11 who wants to compete in the boys' rugby team.

School's response: The school explains that Max cannot compete in the boys' team because he is not of the same biological sex. The school consults medical advice and considers the physical demands of contact rugby. They determine that Max may also not safely participate in full-contact training sessions. However, Max is supported to continue taking part in non-contact training activities and is offered a mentoring role within the team, based on a documented risk assessment.

Legal position: Exclusion from competitive matches is lawful under Section 195 of the Equality Act 2010, based on biological sex and safety reasons. Participation in training is permitted where a risk assessment confirms it can be done safely and without undermining fairness, safeguarding, or the welfare of other pupils.

16. Case Study 3: A staff member with a GRC

Scenario: Ms Smith, a trans woman with a GRC, applies for a job in a girls' boarding house. The role includes overnight safeguarding duties.

School's response: The school considers the safeguarding responsibilities, privacy needs of pupils, and the expectation of parents. Following legal advice, the school determines that the role constitutes a genuine occupational requirement for a biological female. Ms Smith is not appointed to the boarding house post and the reasons for doing so are explained to her and documented.

Legal position: This is lawful under Schedule 9 of the Equality Act, as the occupational requirement is a proportionate means of achieving a legitimate aim, such as safeguarding or protecting privacy.

17. Case Study 4: Temporary access in an emergency

Scenario: Taylor is a Year 9 pupil, who identifies as female and is legally male (based on biological sex). They normally use a separate unisex facility near the library. Due to a burst pipe, that facility and the nearby accessible toilet are out of order for several days. Their only option is to use the boys' toilets or not attend school. Taylor's parent asks if they can use the girls' toilets temporarily.

School's response: The school considers the situation an emergency. The girls' toilets are multi-cubicle with floor-to-ceiling partitions and individual locking doors. After a dignity and risk assessment, the school allows Taylor to use a specified cubicle in the girls' toilets for no more than one week, with supervision adjustments to ensure privacy. The arrangement is documented, limited in time, and ends when alternative facilities are repaired.

Legal position: This may be lawful in an exceptional, time-limited emergency if the school can demonstrate that:

- The inclusion was the least intrusive option available;
- It did not compromise the long-term legal status of the girls' toilet;
- The decision was proportionate, documented, and reversed once the disruption ended.

This approach aligns with schools' duties to provide education, ensure dignity, and avoid unnecessary disruption, while still upholding the law's requirement to maintain appropriate single-sex provision.

18. What next?

It is likely that the Equality and Human Rights Commission will issue updated statutory guidance later this year to provide further clarity on how the ruling should be applied in practice. No specific timeframe has been announced. We may also see organisations on both sides of the debate seek to test these questions through the courts, with the aim of strengthening their respective positions. This is a natural part of how legal frameworks evolve, and future cases may add further nuance to how schools are expected to respond. A good example of this is a High Court ruling in 2024 involving the Michaela Community School, which focused on the lawfulness of a school's decision not to allow a prayer space for pupils. [In this case the school was found to be in breach of regulations but was able to justify why this was lawful as it achieved other proportionate and legitimate aims.](#)

The most important thing for schools to keep in mind is that any decisions made in this area should be thoughtfully considered and clearly documented. Should a decision ever be challenged, a court will examine the school's reasoning, including its understanding of the legal context and its aim to act fairly and without discrimination. Courts look for evidence of reasonable and thoughtful consideration, not legal perfection. Careful records are protective and help to provide reasoning to judgements when challenged.