



Ministry
of Defence

DCS Directive 3.2.27

Schools Accessibility Strategy

DCS June 25 v2.0

Authorisation	Head DCS
Senior Responsible Owners	AH Cyprus and AH ROW
Point of Contact	POLRA
Review Date	June 2026
Related Policy/Guidance	Equality Act 2010
	JSP 342 Education of Service Children Overseas
	JSP 887 The Public Sector Equality Duty in Defence
	DCS Policy Directive 3.2.4 Supporting Pupils with Medical Conditions
	DCS Policy Directive 3.2.22 SEND
	DCS Policy Directive 7.1.5 Safety, Health, Environmental and Fire (SHEF)

Aim

1. This Policy Directive¹ defines how DCS schools and settings can apply, where reasonably practicable, the principles of accessibility. The overall aim of this strategy is to ensure that DCS supports the schools and settings for which it is responsible, in meeting the needs of disabled pupils, raising their attainment and meeting their responsibilities under the Public Sector Equality Duty (Equality Act 2010) including making reasonable adjustments to the school curriculum and resources.

Scope

1. This document applies to DCS schools and settings overseas. Queen Victoria School (Dunblane) follows Scottish National statutory requirements for Accessibility.

Statutory Requirement

2. Where MOD personnel are based in overseas locations the MOD acts in lieu of a UK local authority and delivers so far as is reasonably practicable statutory or near-statutory services following English legislation. JSP 342 says: 'In all overseas locations the MOD seeks, wherever possible, to align its educational policy with the principles laid out in Department for Education (DfE) policy.'

3. Overseas, DCS fills a similar role to a local authority Children's Services Department and delivers (or ensures/assures the delivery of) key children's services (Safeguarding, Education, Health, Social Care etc.), so far as is reasonably practicable. It is important to note that DCS is under no statutory obligation to provide these services.

¹ An EQIA has been completed for this Policy Directive and is available on request.

4. All local authorities in Great Britain must have an Accessibility Strategy for the schools and settings they maintain. This is a requirement of law under Schedule 10 of the Equality Act 2010 and specifically relates to pupils with a disability².

5. Accessibility Strategies share the same principles as Accessibility Plans and define over time, how schools and settings will be supported to:

- a. Increase the extent to which disabled pupils can participate in the curriculum;
- b. Improve the physical environment of schools and settings to enable disabled pupils to take better advantage of education, benefits, facilities and services provided;
- c. Improve the availability of accessible information to disabled pupils.

6. The overseas Command is responsible for all buildings and infrastructure overseas. This means that DCS has only limited responsibility for the physical environment of the school and cannot develop a strategy for Point 6b above. DCS will, however, maintain a strategy with respect to points 6a and 6c above.

7. Whilst DCS schools and settings can support a range of special educational needs and/or disabilities (SEND) they do not have the access to the resources required to support children with a full range of complex needs. All Service children moving overseas are required to undergo an assessment of their support needs, as set out in the MOD Policy Assessment of Support Needs for Accompanied Assignments Overseas. DCS considers what adjustments/adaptations will need to be made for a child when conducting this assessment and whether these are both reasonable and achievable on a case-by-case basis.

Accessibility plan

8. Schools and settings in Great Britain are required under the Equality Act 2010 to have an accessibility plan, and the MOD will mirror this requirement in overseas locations where it is reasonably practicable to do so. DCS schools and settings are therefore required to have an appropriate accessibility plan, the purpose of which is outlined above in paragraph 6.

9. All DCS schools and settings are to develop their Accessibility Plans using this Strategy, paying attention to the actions outlined in the implementation section of this document. Schools and settings may adapt the template Accessibility Plan at **Annex B**. The School Improvement Team will ensure this activity is undertaken by DCS schools and settings.

10. Health and Safety leads in schools and settings should be involved in the formulation of Accessibility Plans with support if required, from the DCS HQ Infra and the SHEF team.

11. It is the School Governance Committee (SGC)'s responsibility to ensure that all DCS schools and settings have an Accessibility plan. All DCS schools and settings are to ensure that Accessibility Plans are endorsed by the Education, Psychology, Speech and

² The Equality Act 2010 defines an individual as disabled if he or she has a physical or mental impairment that has a 'substantial' and 'long-term' adverse effect on his or her ability to undertake normal day to day activities.

Language Team (EPSL) and SEND. The Accessibility plans must be updated annually by DCS schools and settings and subsequently checked annually by the EPSL and SEND teams. Progress on the implementation of School Accessibility Plans will be monitored and evaluated by DCS schools and settings SENDCos.

12. All DCS schools and settings are to publish their Accessibility Plan on their website/DCS website.

13. Accessibility audits will be conducted by the school or setting SENDCos and submitted to the Assistant Head DCS Specialist Support Services in June of even-numbered years (i.e. every two years). A template is available at **Annex C**.

Reasonable Adjustments³

14. DCS schools and settings are required to make 'reasonable adjustments' for pupils with disabilities under the Equality Act 2010, to alleviate any substantial disadvantage that a disabled pupil faces in comparison with non-disabled pupils. This can include, for example, the provision of an auxiliary aid or adjustments to premises.

15. The reasonable adjustments duty comprises:

- a. provisions, criteria and practices
- b. auxiliary aids and services
- c. physical features

16. In seeking to follow English legislation where it is reasonably practicable to do so, DCS schools and settings are to anticipate the needs of potential disabled pupils in addition to those already attending the school and make adjustments, where reasonably practicable in the overseas context.

17. DCS HQ, acting in lieu of a local authority, is responsible for making adjustments, where reasonably practicable, to the physical features of its schools and settings. There is a duty on schools and settings to plan better access for disabled pupils generally through Accessibility Plans.

Intent

18. To achieve DCS's mission to educate the child, support the family, defend the nation. DCS will:

- a. work with the DCS schools and settings pupils, staff, parents and other school visitors to ensure that disabled pupils are not disadvantaged or discriminated against because of their disability
- b. work with DCS schools and settings and school governors to agree reasonable adjustments which will allow disabled pupils full access to school or setting facilities and activities

³ See from p93 of the Equality and Human Rights Commission [Technical Guidance for Schools in England Sept 23](#)

- c. work with DCS schools and settings to identify and plan for the needs of disabled pupils.

Defence Context

19. In the overseas Defence context, DCS does not have access to the full range of specialist provisions for children and young people with SEND for example DCS does not have access to special schools or specialist units. In this context DCS schools and settings can provide, where reasonably practicable, for a range of SEND but not the full range of severe and/or complex SEND.

20. The level of support that can be offered differs according to location. All DCS schools and settings are required to publish their local offer on the DCS/School website.

Implementation

21. DCS will work with the DCS schools and settings which are responsible for:

- a. increasing access to the curriculum for disabled pupils
- b. improving the physical environment for schools and settings to increase access for disabled pupils
- c. making written information more accessible to disabled pupils by providing information in a range of different ways where reasonably practicable

Increasing Access to the Curriculum

1. This strand of the planning duty is intended to improve access for disabled pupils to a full, broad and balanced curriculum, including the wider curriculum of the school, for example, participation in after school clubs, leisure, sporting and cultural activities and school visits.

2. In developing plans for increasing access to the curriculum, DCS schools and settings will need to consider issues such as:

- a. curriculum and lesson planning to enable the effective inclusion of pupils with a diverse range of learning needs
- b. classroom organisation
- c. timetabling
- d. pupil grouping arrangements and use of peer support
- e. deployment of learning support
- f. training of teachers and support staff
- g. allocation of time to ensure that SENDCos and subject or phase leaders have sufficient opportunity to address curricular access issues

3. DCS HQ will provide support to teachers and support staff in planning for increased curriculum access by:

- a. securing staff training, including training for learning support assistants and other support staff
- b. promoting collaboration and sharing of good practice
- c. Supporting curriculum development
- d. ensuring schools and settings are aware of sources of support which can be provided by SENDCos, advisory teachers, educational psychologists and social workers, and staff from other agencies and organisations
- e. championing a SENDCo Community Forum to enable the exchange of good practice

Improving Access to the Physical Environment

4. This strand of the planning duty covers improvements to the physical environment of the School or Setting and the provision of physical aids to access education.

5. The physical environment of the school includes steps, stairways, kerbs, exterior surfaces and paving, parking areas, building entrances and exits (including emergency escape routes), internal and external doors, gates, toilets and washing facilities, lighting, ventilation, lifts, floor coverings, signs and furniture as required. New builds will comply with the latest statutory law / building regulations. Older builds will be reasonably adjusted to meet individual needs where possible, following the DIO / local chain of command lead with support from HQ DCS and RC.

6. Physical aids to access education include ramps, handrails, lifts, widened doorways, adapted toilets and washing facilities, lighting, blinds, and improvements to the acoustic environment. They also include equipment such as ICT equipment, enlarged computer screens and keyboards, concept keyboards, radio aids and loop systems, specialist desks and chairs, and portable aids for children with motor coordination and poor hand/eye skills. Fixed items are the responsibility of the DCS HQ Infra team while non fixed assets such as ICT equipment are the responsibility of RC-DCS-SIS-PAM SO2 in conjunction with the DCS HQ ICT team.

7. All new DCS schools and settings and major extensions to DCS schools and settings will meet the requirements of UK Statutory legislation and building regulations.

8. Subject to the availability of funding, when major extension or refurbishment projects are commissioned at existing schools and settings, HQ DCS will take the opportunity to bring the building, or the remainder of the building, up to the required standards for disabled access.

Increasing Access to Information

9. This part of the duty covers planning to make written information normally provided by the school or setting to its pupils, accessible for disabled pupils. Written information might include worksheets, reading books, text books, timetables, and information about school events. The School or Setting might consider providing the information in clearer or alternative formats (e.g. enlarged text, visual symbols), or providing the information orally.

10. For pupils with visual impairment, strategies to improve the accessibility of written information include:

- a. enlargement of text
- b. clear, well-spaced black print on white matt paper, or pupil specific format
- c. correct seating in relation to the board, whiteboard etc. avoiding sources of glare
- d. optical low vision aids e.g. magnifiers, CCTV

11. Difficulty in accessing written information is not restricted to pupils with visual impairment or dyslexia. For example, children with Attention Deficit Hyperactivity Disorder (ADHD) may find it difficult to access written information because of their distractibility. Adaptations might include classroom placement and management strategies to reduce the possibility of distraction.

12. For pupils who have difficulty in accessing written information, teachers are required to consider whether special arrangements need to be put in place for Key Stage tests and or public examinations in line with Standards and Testing Agency (STA) guidance.

This will be achieved by DCS HQ and DCS Schools and Settings through increasing access to the curriculum, improving access to the physical environment and increasing access to information as outlined in **Annex A**.

Funding

13. All reasonable adjustments that involve capital works for improved physical access must be submitted via district business managers to the Garrison QM or the building owner.

14. The cost of support for present or future disabled pupils (including resources, needed by these pupils and specific staff training e.g. Makaton), should be met from school and setting budgets or approved on a case-by-case basis by the EPSL & SEND team.

DCS HQ and DCS Schools and Settings Responsibilities

DCS HQ will increase access to education by:	
Supporting DCS schools and settings, including Head Teachers and SENDCo's, in relation to strategies, policies and systems available through DCS and the MOD.	Ensuring availability of training and CPD opportunities for school or setting staff to support and enhance the understanding of accessibility in the curriculum.
Allocating funding for the provision of reasonable adjustments.	Facilitating advice to schools and settings from the DCS Specialist Support Services on how best to support Service children and young people with accessing education.
DCS schools and settings will increase access to education by:	
Meeting the duties set out in the Equality Act 2010 and Children and Families Act 2014 with regard to SEND, where reasonably practicable.	Including improvements that increase access to the curriculum in the Accessibility Plan published on the school or setting website/DCS website. This will also be included in the school's Local Offer.
Planning for and teach children with learning needs through a range of interventions and teaching strategies.	Planning for and deliver appropriate interventions and support for vulnerable children.
Establishing effective mechanisms for assessing and monitoring the progress of vulnerable groups.	Evaluating the outcomes of provision and adapt provision accordingly.

Ensuring effective support for vulnerable children in transition on a case-by-case basis.	Applying funding appropriately to ensure that vulnerable groups are not disadvantaged.
Facilitating effective professional development for staff and governors.	Providing opportunities for SENDCo's to share good practice and keep up to date with professional development
Keeping parents/carers informed	

DCS HQ will improve access to the physical environment by:	DCS schools and settings will improve access to the physical environment by:
Planning new buildings and significant extensions/adaptations that comply with accessibility requirements and facilitate access for children with disabilities, where reasonably practicable.	Routinely review the physical accessibility of the school or settings buildings and the site and make timely arrangements to accommodate access where reasonably practicable in collaboration with commands where appropriate.
Ensuring that any new buildings or extensions are appropriately designed in line with accessibility and Health and Safety requirements and ensure all new buildings and significant changes are compliant with UK law and building regulations.	Any modifications to buildings, new buildings or significant changes are compliant with UK law and building regulations.
Routinely review existing provision in DCS schools and settings for which DCS is responsible to ensure that they comply with accessibility legislation and requirements, where reasonably practicable.	Ensure improvements that increase access to the physical environment in the Accessibility Plan published on the school website/DCS website.

Ensuring the existing provision in DCS schools and settings meet the standards of the time that they were built.	Comply with anticipatory obligations as set out in the Equality Act 2010.
Monitor transition arrangements for children coming into DCS schools and settings and those moving across school phases.	Respond to the expectations set out in this DCS strategy and national guidance on meeting the Equality Act 2010 and Children and Families Act 2014 with regard to SEND.
Work with DCS schools and settings Educational Psychologist and SEND Adviser to assist with issues regarding individual placements.	Undertake any improvement projects in liaison with DCS HQ and DIO and adhere to building regulations and Health and Safety requirements.
Fund projects that increase access to the physical environment from within DCS allocated resources.	Ensure curriculum needs are met by providing access to appropriate classroom facilities.
Ensure that any new works are supported by the Statement of Requirement (SOR), Occupational Health Assessments and any other supporting evidence. As well as ensuring that there is a funded mechanism for reasonable change and/or adjustments via DIO and the local chain of command.	Adhere to specific direction within this DCS's Accessibility Strategy.
	Conduct risk assessments for school visits and ensure access for children with disability.
	Facilitate effective professional development for staff and governors.
	Keep parents and carers informed
DCS HQ will increase access to information by:	
Facilitate advice to schools and settings from the DCS Specialist Support Services on how best to support Service children and young people with accessing education.	
DCS schools and settings will increase access to information by:	

<p>Monitor and review the skills and expertise of staff to support pupils with disability.</p>	<p>Include improvements that increase accessibility in the Accessibility Plan published on the school or setting/DCS website.</p>
<p>Involve pupils and their families in the decision processes regarding accessibility of information.</p>	<p>Ensure that a range of communication techniques and technology is used to increase access to information.</p>
<p>Provide information for Service children and families in accessible formats where reasonably practicable.</p>	

Accessibility plan template

This document sets out the aims of our accessibility plan in accordance with the Equality Act 2010.

The information set out in the column of 'current good practice' are examples to guide your own analysis of your current practice. They are not a thorough representation of good practice and should be adapted to suit your school or settings context.

Aim	Current good practice <i>Include established practice and practice under development</i>	Any Actions to be taken	Person responsible	Date to complete actions by
Increase access to the curriculum for pupils with a disability	<p>Explain your school or settings approach here. Examples:</p> <p><i>Our school offers a differentiated curriculum for all pupils.</i></p> <p><i>We use resources tailored to the needs of pupils who require support to access the curriculum.</i></p> <p><i>Curriculum resources include examples of people with disabilities.</i></p> <p><i>Curriculum progress is tracked for all pupils, including those with a disability.</i></p> <p><i>Targets are set effectively and are appropriate for pupils with additional needs.</i></p> <p><i>The curriculum is reviewed to ensure it meets the needs of all pupils.</i></p>			

Aim	Current good practice <i>Include established practice and practice under development</i>	Any Actions to be taken	Person responsible	Date to complete actions by
Improve and maintain access to the physical environment	<p>Explain your school or settings approach here. <i>Example:</i></p> <p><i>The environment is adapted to the needs of individual where possible by way of a reasonable adjustment.</i></p> <p><i>This includes:</i></p> <ul style="list-style-type: none"> • <i>Ramps</i> • <i>Elevators</i> • <i>Corridor width</i> • <i>Disabled parking bays</i> • <i>Disabled toilets and changing facilities</i> • <i>Library shelves at wheelchair-accessible height</i> 			
Improve the delivery of information to pupils with a disability	<p>Explain your school or settings approach here. <i>Example:</i></p> <p><i>Our school uses a range of communication methods to ensure information is accessible. This includes:</i></p> <ul style="list-style-type: none"> • <i>Internal signage</i> • <i>Large print resources</i> • <i>Pictorial or symbolic representations</i> 			

Accessibility Audit

The table below contains some examples of features you might assess as part of an audit of the school or settings physical environment. It is not an exhaustive list and should be adapted to suit your own context.

Feature	Description	Action to be	Person responsible	Date to complete actions by:
Number of storeys				
Corridor access				
Lifts				
Parking bays				
Entrances				
Ramps				
Toilets				
Reception area				
Internal signage				
Emergency escape routes				