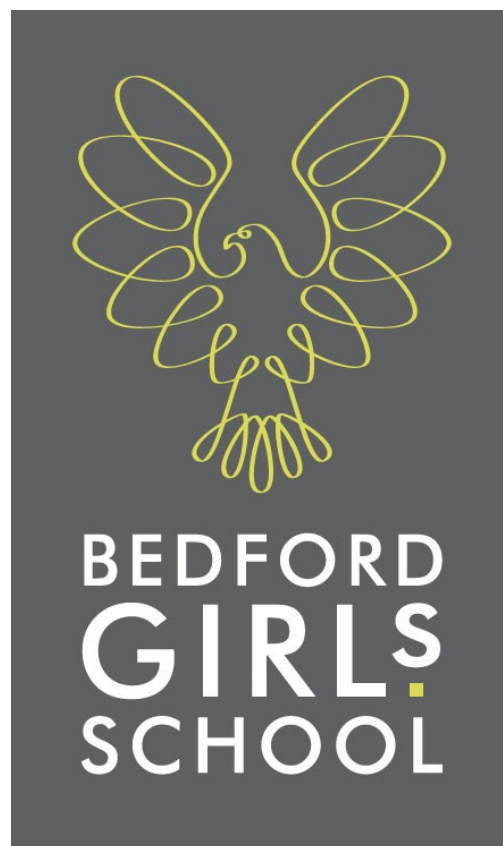


# Bedford Girls' School – Accessibility for Disabled Students

## Accessibility for Disabled Students Plan 2022 -2025



# Bedford Girls' School – Accessibility for Disabled Students

## 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 Statements of Educational Needs and Disabilities.
- 1.2 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 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.
- 1.3 The School arises from the merger of Dame Alice Harpur School and Bedford High School for Girls in 2010 however some aspects of this plan relating to the Cardington Road Site have been adopted from the former site occupant, Dame Alice Harpur School for purposes of history and continuity.

# Bedford Girls' School – Accessibility for Disabled Students

## 2.0 Definition of Disability & Legal Context

### The definition of 'disability' under the Equality Act 2010

In the Act, a person has a disability if:

- they have a physical or mental impairment
- the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities

For the purposes of the Act, these words have the following meanings:

- 'substantial' means more than minor or trivial
- 'long-term' means that the effect of the impairment has lasted or is likely to last for at least twelve months (there are special rules covering recurring or fluctuating conditions)
- 'normal day-to-day activities' include everyday things like eating, washing, walking and going shopping

People who have had a disability in the past that meets this definition are also protected by the Act.

**Appendix 1** of this document provides a full definition together with Frequently Asked Questions as an aid to communication and understanding.

Because the definition is broad, the number of people covered by the EQUALITY ACT is quite large and translates as 7% or more of the total child population in the UK. Many of the children who have Statements of Learning Support Need fall within the terms of the EQUALITY ACT, and the definition also includes other children who do not have statements.

- 2.1 The SEN and Disability Act 2001 extended the Disability Discrimination Act 1995 to cover education, and was further amended by the Disability Discrimination Act 2005. All Schools currently have three key duties towards disabled students, under Schedule 10 of the EQUALITY ACT 2010, namely:

- To not treat disabled students less favourably for a reason related to their disability, including increasing the extent to which disabled students can participate in the curriculum.
- To make reasonable adjustments for disabled students, so that they are not at a substantial disadvantage including improving the delivery to disabled students of information, which is provided in writing for students who are not disabled.
- To implement accessibility strategy through the improvement of the physical environment of the school to increase the extent to which disabled students can take advantage of education and associated services.

# Bedford Girls' School – Accessibility for Disabled Students

## 2.2 SCHEDULE 10 of the Equality Act 2010 Accessibility for disabled students states the following: Accessibility strategies

1(1) A local authority in England and Wales must, in relation to schools for which it is the responsible body, prepare

(a) an accessibility strategy;

(b) further such strategies at such times as may be prescribed.

(2) An accessibility strategy is a strategy for, over a prescribed period—

(a) increasing the extent to which disabled students can participate in the schools' curriculums;

(b) improving the physical environment of the schools for the purpose of increasing the extent to which disabled students are able to take advantage of education and benefits, facilities or services provided or offered by the schools;

(c) improving the delivery to disabled students of information which is readily accessible to students who are not disabled.

(3) The delivery in sub-paragraph (2)(c) must be—

(a) within a reasonable time;

(b) in ways which are determined after taking account of the students' disabilities and any preferences expressed by them or their parents.

(4) An accessibility strategy must be in writing.

(5) A local authority must keep its accessibility strategy under review during the period to which it relates and, if necessary, revise it.

(6) A local authority must implement its accessibility strategy.

2(1) In preparing its accessibility strategy, a local authority must have regard to—E+W+S

(a) the need to allocate adequate resources for implementing the strategy;

(b) guidance as to the matters mentioned in sub-paragraph (3).

(2) The authority must also have regard to guidance as to compliance with paragraph 1(5).

(3) The matters are—

(a) the content of an accessibility strategy;

(b) the form in which it is to be produced;

(c) persons to be consulted in its preparation.

(4) Guidance may be issued—

(a) for England, by a Minister of the Crown;

(b) for Wales, by the Welsh Ministers.

(5) A local authority must, if asked, make a copy of its accessibility strategy available for inspection at such reasonable times as it decides.

(6) A local authority in England must, if asked by a Minister of the Crown, give the Minister a copy of its accessibility strategy.

# Bedford Girls' School – Accessibility for Disabled Students

(7) A local authority in Wales must, if asked by the Welsh Ministers, give them a copy of its accessibility strategy.

## Accessibility plans

3(1) The responsible body of a school in England and Wales must prepare

(a) an accessibility plan;

(b) further such plans at such times as may be prescribed.

(2) An accessibility plan is a plan for, over a prescribed period—

(a) increasing the extent to which disabled students can participate in the school's curriculum,

(b) improving the physical environment of the school for the purpose of increasing the extent to which disabled students are able to take advantage of education and benefits, facilities or services provided or offered by the school, and

(c) improving the delivery to disabled students of information which is readily accessible to students who are not disabled.

(3) The delivery in sub-paragraph (2)(c) must be—

(a) within a reasonable time;

(b) in ways which are determined after taking account of the students' disabilities and any preferences expressed by them or their parents.

(4) An accessibility plan must be in writing.

(5) The responsible body must keep its accessibility plan under review during the period to which it relates and, if necessary, revise it.

(6) The responsible body must implement its accessibility plan.

(7) A relevant inspection may extend to the performance by the responsible body of its functions in relation to the preparation, publication, review, revision and implementation of its accessibility plan.

(8) A relevant inspection is an inspection under—

(a) Part 1 of the Education Act 2005, or

(b) Chapter 1 of Part 4 of the Education and Skills Act 2008 (regulation and inspection of independent education provision in England).

4(1) In preparing an accessibility plan, the responsible body must have regard to the need to allocate adequate resources for implementing the plan.

(2) The proprietor of an independent educational institution (other than an Academy) must, if asked, make a copy of the school's accessibility plan available for inspection at such reasonable times as the proprietor decides.

(3) The proprietor of an independent educational institution in England (other than an Academy) must, if asked by a Minister of the Crown, give the Minister a copy of the school's accessibility plan.

# Bedford Girls' School – Accessibility for Disabled Students

## 3.0 Policy Statement on Facilities for Disabled Students

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

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

- (i) Improvements in access to the curriculum by:
  - Providing for all students a curriculum which is appropriate to their needs;
  - Ensuring that the curriculum is delivered in such a way that all students, regardless of any impairment, may benefit fully from it.
- (ii) Physical improvements to increase access to education and associated services by:
  - Ensuring that all the School buildings and grounds are fully accessible to students with mobility, sensory and other impairments;
  - Providing appropriate educational equipment and physical aids to ensure that educational programmes in the School can be fully accessed by all students.
- (iii) Improvements in the provision of information in a range of formats for disabled students by:

Providing for students and their parents or guardians, information about the School and its curriculum in a format that takes account of any disabilities.

## 4.0 Admissions

- 4.1 The School admits girls at various entry ages on an academic selective basis based on performance in examinations backed up by reports from the current school. Wherever possible, disability will not prevent a girl from selection who is otherwise up to the academic standard required and who is in a position to benefit from the education offered at the School.
- 4.2 The School operates an inclusive Admissions Policy (See **Appendix 2** for full copy) 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.

## Bedford Girls' School – Accessibility for Disabled Students

- 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 a Statement of Educational Needs, 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 disabilities or 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). Details of the School’s Learning Support Policy is attached at **Appendix 3**. 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 your daughter’s future education.
- 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.

# Bedford Girls' School – Accessibility for Disabled Students

## 5.0 Access to Curriculum

- 5.1 The Cardington Road Junior School and Senior School site is spread over a 16-acre area, with a public road in between and incorporate several listed buildings. The School playing fields are 3 miles away at Cople Fields. This means that, by its very nature, the site can be difficult to move around. Lifts, ramps and disabled WCs have been included in the more recent constructions, and conversions and future developments will take account of improving access for the physically 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 a physically disabled persons, there remain some areas and buildings without lifts.
- 5.3 During the life of this Disability Access 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 in such a way that, with additional support, physically disabled 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 become disabled or her additional needs may first be identified, or 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 Bedford Charity 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 disabled students are attached at **Appendix 4**.



# Bedford Girls' School – Accessibility for Disabled Students

## **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 has reviewed door opening and closing mechanisms and highlighted other adaptations to accommodate the needs of disabled people.
- 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 disabled 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 disabled students 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.

# Bedford Girls' School – Accessibility for Disabled Students

## 6.0 Review, Co-ordination & Communication

- 6.1 Disability Access Coordination is the responsibility of the Bursar and the Deputy Head (Pastoral). They consult with the other members of the Senior Leadership Team, the Head of the Sixth Form, the Head of Examinations, the Estates Manager, and others as appropriate. In addition, they will seek advice and input from the School Nurse and those professional advisors deemed 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 School's Disability Access Plan
- To monitor the implementation of this Plan and to review as necessary, and at least every 3 years.
- In addition, the Bursar will table an annual review of the plan by the School Committee of Governors.

## Staff training

- 6.2 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 Disability Access Policy

- 6.3 This Policy 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 Policy via the School's website and the School supplies written copies of this Policy 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.

## Bedford Girls' School – Accessibility for Disabled Students

### Communication Improvement

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

	Targets	Strategies	Outcomes	Timeframe	Goals achieved
Short term	To improve communication with disabled 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 disabled students.
	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 disabled students improved.	
Longer term	To consult with Disability Information Service about the best way to make information available to users.	To increase levels of awareness amongst staff responsible for information.	Increased variety of information available.	From 2023 onwards.	Delivery of information to disabled students to improve further.

# Bedford Girls' School – Accessibility for Disabled Students

## 7.0 Welfare

- 7.1 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 is attached as [Appendix 5](#).
- 7.2 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 (See [Appendix 6](#)) and are reminded regularly of it. Students are encouraged to speak to teachers 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.
- 7.3 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.
- 7.4 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.
- 7.5 The procedure for ensuring the care of children are as follows:
- regular monitoring by the class teachers & tutors
  - all adults working as pastoral/academic teams in monitoring and supporting students throughout the school day
  - placing information in the staff room to inform staff about individual children with medical conditions, including photos and their treatments (i.e. health care plans)
  - morning briefings to ALL teaching and pastoral staff in Staff Common Room and e-mailing notes of briefing to absent staff on a daily basis
  - oral updating by School Nurses of any changes or new students / conditions at briefing
  - training of staff in the use of Epipens (and allergies)
  - many staff holding HSE First Aid certificates which are renewed every 3 years
  - working with parents to facilitate the needs of students e.g. asthma inhalers
- 7.6 If parents believe that their daughter has been unfairly treated by the School they may utilise the published complaints procedure (See [Appendix 7](#)).

# Bedford Girls' School – Accessibility for Disabled Students

## Diet and Medication

- 7.7 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.
- 7.8 The School employs three 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.

# Bedford Girls' School – Accessibility for Disabled Students

## 8.0 Access to Estate Facilities and Improvements made

- 8.1 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. New schematics of the site are in the process of being drawn up and will be inserted into this plan when available.

### Improvements 2003 to 2009 (DAHS Disability Access Plans)

- 8.2 In 2003 the following subject classrooms were already accessible:

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

In 2003, the following subject areas were not accessible:

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

- 8.3 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           | • Information Tech | • Languages |
| • Geography         | • History          | • Food Tech |
| • Religious Studies |                    |             |

- (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 |
|---|-----------|

## Bedford Girls' School – Accessibility for Disabled Students

- 8.4 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.
- 8.5 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.
- 8.6 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.
- 8.7 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.
- 8.8 In 2019, two science classrooms that has a stepped threshold were refurbished and ramped access provided to remove the step.
- 8.9 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.
- 8.10 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.
- 8.11 **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 | • Sixth Form House | • Howard House (first and second floors only) |
| • Swimming Pool                                      | • PE (Sports Hall) | • Wing House                                  |
| • Kilpin 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.

## Bedford Girls' School – Accessibility for Disabled Students

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

9.0 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.*



# Bedford Girls' School – Accessibility for Disabled Students

## Appendices

- **Appendix 1:** The Definitions of Disability and Frequently Asked Questions
- **Appendix 2:** Admissions Policy and Entry Procedure
- **Appendix 3:** Learning Support Policy
- **Appendix 4:** Examinations Procedures with respect to EQUALITY ACT
- **Appendix 5:** Charity Equality & Diversity Policy
- **Appendix 6:** Anti-Bullying Policy
- **Appendix 7:** Complaints Procedure

# Bedford Girls' School – Accessibility for Disabled Students

## THE DEFINITIONS OF DISABILITY

## Appendix 1

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.

# Bedford Girls' School – Accessibility for Disabled Students

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

## Appendix 1

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.

# Bedford Girls' School – Accessibility for Disabled Students

## Appendix 1

### **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.

# Bedford Girls' School – Accessibility for Disabled Students

## ADMISSIONS POLICY

## Appendix 2

Last Reviewed December 2021

Next Review December 2022

Reviewed by the Headmistress

### Introduction

Bedford Girls' School is an academically selective independent day school for girls from the age of 7-18. We have a dual stream Sixth Form offering both the International Baccalaureate Diploma Programme and A Levels.

The purpose of our Admissions Policy is to ensure that we continue to fulfil our aim of attracting students of ability to be part of a school that wants to develop forward thinking women who are confident to choose their own path and aspire to make a difference to the world around them.

### Choosing the School

We understand the importance of deciding on the right school for your daughter. We feel that visiting the school personally is often the best way to understand what makes BGS special and to gain a real understanding of our rich educational offer.

We hold a number of open events throughout the year which give a general introduction to the school. Details are published on our website. We are also very happy to welcome prospective parents and their daughters at other times for small group or individual tours. Please do contact our Admissions Dept for details ([admissions@bedfordgirlsschool.co.uk](mailto:admissions@bedfordgirlsschool.co.uk))

### Criteria for Entry

We seek to admit candidates whom we consider capable of benefiting from the education provided at Bedford Girls' School and who will contribute fully to the life of the School. We wish to support these students to achieve their personal best.

We embed the International Baccalaureate philosophy into all that we do, encouraging candidates to become internationally minded and recognise their common humanity and shared guardianship of the planet, and help to create a better and more peaceful world.

Selection for entry to the School is on merit. All candidates are assessed through entrance tests, references from the candidate's current school, as well as interviews and reports from the school depending on the entry level.

Successful candidates will have met our academic entry requirements. They will also have demonstrated ability and/or interest in the co-curricular areas and we feel they would benefit and have the potential to do well in the Bedford Girls' School environment. Our selection process is designed to identify students who are able to benefit from our balanced and well-rounded education and who will make a positive contribution towards the life of the School. We are seeking students who want to make a difference to the world around them.

Applicants may be considered as candidates for admission to the School once the Registration Form has been completed and returned with the £100 registration fee, which is non-refundable.

The main points of entry into the school are Year 3, Year 5, Year 7, Year 9 and Lower Sixth with admissions into other year groups being dependent on vacancies. Our main assessment period is in the January of the year of entry. However, we will consider applications made at any time during the school year if places are available in the year group.

# Bedford Girls' School – Accessibility for Disabled Students

## Equal Opportunity

Candidates for admission will be treated equally, irrespective of their or their parents' race, sexual orientation, religion or belief, pregnancy or maternity, gender reassignment or any disability. Candidates will also be treated equally in respect of their parents' age, sex or marital or civil partnership status.

We also welcome applications from students with disabilities or special educational needs and the School will do all that is reasonable to comply with its obligations under the Equality Act 2010 and the Special Educational Needs and Disability Code of Practice, 0-25 years 2014.

The School needs to be aware of any known disability or special educational need which may affect a child's ability to participate in the admissions process and take full advantage of the education provided at the School. We advise parents of children with special educational needs or physical difficulties to discuss their child's requirements with the School before the assessments so that we can consult about the adjustments which can be reasonably made to ensure that the admissions process is accessible and the School can cater adequately should an offer of a place be made. Please refer to our Learning Support Policy for more detail. Parents must alert us to any disability, special educational need or medical condition in the application form.

Parents of prospective students where English is an additional language (EAL) and not the first language spoken at home must alert us in the application form. Prospective EAL students, sit the same tests as other students, but in appropriate circumstances, allowances will be made regarding the admissions tests to allow those with EAL to show their full potential. We will contact parents to ensure we address the level of support their daughter may require in the assessments. Please refer to our English as an Additional Language Policy.

During the assessment our Learning Support Manager will supervise any students with special educational needs or disabilities as required. Once a candidate is accepted into the school, and provided that she can benefit from the type of education we offer, the School will work with the family to ensure that any particular learning needs are met.

## Selection Process

Each year we publish the entrance assessment dates on our website along with details of our Open Days and events. The entrance examinations for Bedford Girls' School Junior School and Senior School are held in the January prior to the Autumn Term admission.

## Entry to the Junior School

The entrance assessment for the Junior School (Years 3 – 6) consists of a series of online Cognitive Ability Tests (CAT), a creative writing task and a reading activity.

For entry to the Junior School, candidates will normally spend two half days in the school working alongside students of the same age. A mixture of fun activities and individual work, which includes online standardised tests, allows the staff to assess a candidate's potential. This assessment procedure, together with a report from the candidate's present school, helps us to identify those who will most benefit from the opportunities available at Bedford Girls' School.

## Internal Transferring from the Junior School to the Senior School

It is the expectation that all students from the Junior School will successfully transfer into the Senior School. From time to time, however, the recommendation is made that a student might not make the transfer. In such a case, parents have always been alerted before their daughter reached the end of Year 5 and it is recommended that they should explore possible alternative secondary schooling, in case a positive recommendation for transfer into the Senior School cannot be made. In the very few cases where transfer is not recommended, based on their performance in the transition examination, we always offer active assistance and support in identifying and contacting a suitable alternative school.

# Bedford Girls' School – Accessibility for Disabled Students

All current Year 6 students undertake the same CAT tests as our external candidates as part of their transition programme for the Senior School. Tests are taken online in a classroom setting. Performance in the assessment is used to provide Senior School staff with additional and consistent underlying data on all students entering Year 7 to aid their transition to the Senior School. It may also be used to determine if additional support is needed.

## Entry to the Senior School

Senior School entrance assessments consist of a series of online Cognitive Ability Tests (CAT) looking at underlying verbal, non-verbal, spatial and quantitative ability and will be used to identify the candidate's potential. Candidates may also be asked to undertake a short creative writing task. All candidates will be interviewed by the Headmistress, Deputy Head or relevant Head of Year as part of the entrance assessment process and a report will be requested from their current school.

We are also able to facilitate remote assessments for overseas candidates, in conjunction with their current school, who will be requested to invigilate the online assessments. Interviews will be held remotely via Microsoft Teams or Zoom.

## Entry into the Sixth Form

Bedford Girls' School is an International Baccalaureate School. We offer the Diploma Programme in the Sixth Form. Girls have a choice to take either the Diploma Programme or follow a course of three A Levels.

The minimum entry requirement for our Sixth Form is five Grades 9 – 6 at GCSE with a minimum of a 6 in the subjects the candidate wishes to study at A Level or IB. For some specific subjects a minimum of a 7 is required at GCSE. Entry to the Sixth Form depends upon a satisfactory report from their present Headteacher, the minimum GCSE requirements and suitable CAT scores. All Sixth Form candidates will also be required to undertake a short writing task.

Potential Sixth Form students can request a taster session where they come into School for the morning to sample Sixth Form lessons, meet the Director of Sixth Form and relevant Heads of Department. Once registered, the candidate is then asked to sit a series of Cognitive Ability Tests and have an interview with the Headmistress and the Director of Sixth Form. A candidate for Sixth Form entry will usually receive a conditional offer of a place following receipt of a supportive reference from her current school.

We are happy to consider candidates who look to join us from educational systems where they do not undertake external examinations at age 16. Entry requirements for these candidates will be based upon a satisfactory report from their present Headteacher, and a suitable CAT scores in line with the subjects they wish to study at Sixth Form.

## Transfer from BGS Year 11 into the Sixth Form

Transfer from Year 11 into the Sixth Form is dependent on the GCSE grades of the student. The minimum entry requirement for our Sixth Form is five Grades 9 - 6 at GCSE with a minimum of a 6 in the subject she wishes to study at A Level or IB. For certain subjects a specific grade at GCSE may be required, candidates should refer to the A Level and IB curriculum booklets.

Interviews are held between the Headmistress and all current BGS Year 11 students in the Autumn Term of Year 11 to discuss plans and aspirations for Sixth Form and post school study/employment. If there is concern that a Year 11 student who wishes to stay on in the Sixth Form may not obtain the minimum requirements for the Sixth Form, discussions are held with the parents of the student. Strategies are put in place to support the student, but if they fail to meet the GCSE requirements of the Sixth Form, they will not be awarded a place.

## References/Reports

We liaise closely with the applicant's current school and require the Headteacher of the applicant's school to provide a confidential report. We ask parents and schools to provide any information that will help us to make our decision including any existing assessment of need for individual support.

Parents considering transferring their daughter from another school must inform the other school of their plans to enter their daughter for our examination and to fulfill all financial obligations to that school.

## Late applications/applications for mid-year entry

Where vacancies exist we do consider late, or mid-year, entry. We keep, as far as possible, to our normal assessment procedures, taking into account any particular urgency which applies in an individual case. A candidate is never admitted without reference to her present school.

## Fee Assistance

A limited number of academic bursaries are available for girls from Year 7 upwards. Academic bursaries are offered dependent on parental income and academic ability. Demand for fee assistance is usually high and therefore we are only able to assist a small number of applicants each year who perform particularly well in the Senior School assessments. Bursaries are allocated based upon the results of candidates who sit assessments during the **Main Assessment Period in January** and we are unable to consider bursary requests for entry at any other time of the year.

## Overseas Application

We can only accept girls who have British citizenship or a visa to be educated in the UK. As a school we do not have a license to help facilitate the visa application. If you are currently living overseas and wish to return to the UK we can facilitate with the assessment tests being taken overseas in your current school. We always support families as they transfer to the UK and are able to arrange for additional virtual meetings with key staff and tours of the School upon arrival. We are also able to offer advice about moving within the School's catchment areas. Where possible we will try to connect new families with existing families prior to the start of term.

## Offers

During the **Main Assessment Period**, parents are informed towards the middle February whether or not the School will offer their daughter a place and those offered places are asked to confirm their acceptance by early March. A deposit of £500 is payable when parents return the acceptance form to the School to accept the place for their daughter. This deposit is refunded (less any outstanding charges) when their daughter leaves the school.

If the amount of offers exceeds the number of places available in a particular year group, candidates will be placed on a waiting list in order of overall suitability and contacted should a place become available.

Acceptance of registration and admission into Bedford Girls' School is determined by the Headmistress and is subject to the Terms and Conditions that apply and amendments will be made to these periodically. Updated Terms and Conditions are held on the school website ([www.bedfordgirlsschool.co.uk](http://www.bedfordgirlsschool.co.uk))

## Late Offers

**Late Assessments** are only offered in Year Groups where spaces are currently available. Results from a late assessment is normally communicated either by phone or email within a few days of sitting the assessment, once the school have all the required information including a reference from the current school. Parents are given two



weeks to accept an offer of a late place, from the date of the offer. A deposit of £500 is payable when parents return the enrolment form to the School to accept the place for their daughter. This deposit is refunded (less any outstanding charges) when their daughter leaves the school.

If a late assessment takes place after new student induction events have happened, we will try to facilitate a call or meeting, in Term time, with the relevant Form Tutor.

Acceptance of registration and admission into Bedford Girls' School is determined by the Headmistress and is subject to the Terms and Conditions that apply and amendments will be made to these periodically. Updated Terms and Conditions are held on the school website ([www.bedfordgirlsschool.co.uk](http://www.bedfordgirlsschool.co.uk))

### **Information on examinations, appeals and complaints**

The School will do all that it can to ensure that the process of selection is fair and meticulous. After the assessment, the School is willing to offer guidance as to the strengths and weaknesses of a candidate's performance though it will not reveal exact details of the performance of individual candidates.

The decision of the Bedford Girls' School Governing Body in awarding bursaries is final and is not subject to appeal.

Bedford Girls' School hopes that parents and students do not have any complaints about the School's admissions process, but copies of the School's complaints procedure can be sent to parents on request.

Reviewed: August 2022

Next Review: August 2023

Reviewed by: Deputy Head (Pastoral)

{Insert 2022 L Supp Policy – with Tom  
Williams – not provided as at 25/8/22}

**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

## Appendix 4

- 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 / workers<sup>1</sup>, 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 to 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.

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<sup>1</sup> 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.

## ANTI BULLYING POLICY

## Appendix 6

Review date: August 2022

Next review: August 2023

Reviewed by: Deputy Head - Pastoral

This policy sets out the aims of Bedford Girls' School in relation to bullying behaviour. It provides a framework within which any actions against bullying can be implemented and their effectiveness reviewed. The school values represented here are also reflected in the Positive Behaviour Policy, which incorporates the views of students. Staff are reminded of our Anti- Bullying Policy and where relevant, staff are trained in anti-bullying strategies.

### Guiding Principles

The aim of our anti-bullying policy is to clarify that, within our school community, bullying at any level is always unacceptable. Bullying is included in the list of behaviours which qualify as peer-on-peer abuse. If left unaddressed it can have a devastating effect on individuals. It can be a barrier to their learning and have serious consequences for their mental health. Bullying which takes place at school does not only affect an individual during childhood but can have a lasting effect on their lives well into adulthood. By effectively preventing and tackling bullying, schools can help to create safe, disciplined environments where pupils are able to learn and fulfil their potential.

This anti-bullying policy document reflects our commitment to encouraging an environment where independence is celebrated and individuals can flourish without inhibition. Every member of the community has the right to be safe and happy in school and to be protected when they are feeling vulnerable. At BGS we aim to create an environment that prevents bullying from being a serious problem in the first place by creating an ethos of good behaviour where pupils treat one another and the school staff with respect.

The non-statutory DfE advice "[Preventing and Tackling Bullying](#)" July 2017 and "[Cyberbullying – advice for headteachers & staff](#)" 2014 has helped to guide this policy.

This policy should be read in conjunction with the school's Positive Behaviour policy, the Child Protection and Safeguarding policy and the e-Safety policy.

The objectives of our anti-bullying policy are to:

- clarify the school's collective understanding of the nature of bullying;
- involve the students themselves to share expectations and good practice to create culture of kindness in school
- underline the seriousness of bullying both physical and emotional, in its potential for causing psychological damage and even suicide;
- establish an agreed code of expectations for all school members;
- encourage staff to maintain awareness and understanding of potential for, and effects of, bullying in the classroom;
- make bullying an explicit theme in assemblies and through the curriculum e.g. Personal, Social and Health Education;
- provide appropriate opportunities for pupils to share and consider relevant behavioural issues in a secure learning environment;
- encourage liaison between the school and parents;
- maintain a regular review of this policy.

### What is Bullying?

Bullying is behaviour by an individual or group, repeated over time, that intentionally hurts another individual or group either physically or emotionally. Bullying can take many forms (for instance, cyber-bullying via text messages or the internet), and is often motivated by prejudice against particular groups, for example on grounds of race, religion, gender, sexual orientation, or because a child is adopted or has caring responsibilities. It might be motivated by actual differences between children, or perceived differences. Stopping violence and ensuring immediate physical safety is obviously a school's first priority but emotional bullying can be more damaging than physical; each case will be considered on an individual basis.

Many experts say that bullying involves an imbalance of power between the perpetrator and the victim. This could involve perpetrators of bullying having control over the relationship which makes it difficult for those they bully to defend themselves. The imbalance of power can manifest itself in several ways, it may be physical, psychological (knowing what upsets someone), derive from an intellectual imbalance, or by having access to the support of a group, or the capacity to socially isolate. It can result in the intimidation of a person or persons through the threat of violence or by isolating them either physically or online.

Definitions of bullying vary, but there are **three essential elements** that are always present:

- an unequal power relationship between the bully and target
- the deliberate and continued use of aggression
- the causing of physical pain and/or emotional distress

## Cyber-bullying

The rapid development of, and widespread access to, technology has provided a new medium for 'virtual' bullying, which can occur in or outside school. Cyber-bullying is a different form of bullying and can happen at all times of the day, with a potentially bigger audience, and more accessories as people forward on content at a click.

When an electronic device, such as a mobile phone, has been seized by a member of staff who has been formally authorised by the headteacher, that staff member can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If an electronic device that is prohibited by the school rules has been seized and the member of staff has reasonable ground to suspect that it contains evidence in relation to an offence, they must give the device to the police as soon as it is reasonably practicable. Material on the device that is suspected to be evidence relevant to an offence, or that is a pornographic image of a child or an extreme pornographic image, should not be deleted prior to giving the device to the police. If a staff member finds material that they do not suspect contains evidence in relation to an offence, they can decide whether it is appropriate to delete or retain the material as evidence of a breach of school discipline.

If anyone receives hurtful cyber messages to tease, bully or threaten, that cause distress or discomfort, these should be saved and the matter reported to a teacher. Our ICT security system is able to trace any email on our system that is reported as being malicious.

The students are also taught in their PSHE lessons and the message reinforced in form tutorials to seek help if they experience problems, understanding that they are not accountable, nor should they feel guilty, for the actions of others in which they are unwilling participants.

## Who is the object of the bullying?

Any pupil is at risk, but there are certain indicators:

- lacking close friends in school
- being shy
- coming from an over-protective family environment
- being a carer or adopted
- being from a different racial, religious or cultural group
- being homosexual, lesbian, bisexual or transgender
- having a mental or physical disability
- being different in some obvious respect from the majority
- having specific learning difficulties
- being a 'provocative victim' (a child who behaves inappropriately with others)
- the obviously sensitive child

**None** of these factors can excuse bullying.

## **What are the signs of bullying?**

Young people may:

- be frightened of walking to and from school
- be unwilling to go to school: feigning illness, increase in absences, late arrival at school or lessons
- change their route to school
- begin doing badly in school work
- come home with possessions missing or damaged
- become withdrawn and anxious/change in their usual behaviour
- suffer psychological damage
- have nightmares
- seem to lose a lot of possessions
- ask for or steal money
- continually appear to lose pocket money
- refuse to say what is wrong
- give improbable excuses for any of the above situations
- be anxious about checking computer messages, e-mails or texts
- self-harm
- consider or attempt suicide

## **Encouragement to Tell**

It is important that we aim to create an atmosphere in the school where a pupil who is being bullied, or others who know about it, feel that they will be listened to and believed, and that action will be swift but sensitive to their concern. Not telling protects the bully or bullies and gives the message that they can continue, perhaps bullying others too. We encourage students to approach any member of staff with whom they feel comfortable. We have notices in every form room alerting students to the nature of cyberbullying and giving advice on how to respond, if such situations arise.

## **Procedures**

Bullying will lead to consideration under Safeguarding Children and Child Protection procedures if the pupil identified may be at risk or is at risk of serious harm. Restorative practice will usually be used to resolve any conflict. This enables those who have been harmed to convey the impact of harm to those responsible and for those responsible to acknowledge the impact their actions have had and to take steps to put it right.

If a parent raises the concern via email, then a conversation will be arranged with the parent and an agreement to report back to them within an agreed timescale will be arranged. When setting a timescale for investigating a bullying complaint, staff need be realistic and consider other commitments within school.

If a child raises a concern, preliminary investigations will occur and then the parent will be contacted. The concern raised will be investigated and this will involve interviewing both the alleged perpetrator and the victim, as well as any witnesses including bystanders and staff deemed relevant to the concern.

Questions might include:

- How long has the bullying been going on?
- What has been happening
- Where is it happening
- Who was involved?
- Were other pupils around at the time?
- How is it affecting the child?
- Did the child tell a teacher or any other adult?

Written statements are often asked for. We make it clear to the victim that revenge is not appropriate, and to the perpetrator that her behaviour is unacceptable and has caused distress. Every effort is made to resolve the problem through counselling of both parties, where an understanding of the perpetrator's motivation should be sought and addressed. The perpetrator should be helped to face up to and accept responsibility for the harm she has caused. The victim will also be supported, for example, through mentoring or touching base with a trusted adult. The situation will continue to be monitored over a period of time.

At this stage, it is usual for the parents of all parties to be informed of what has happened, and how it has been dealt with. Details of any sanctions given to students will not be shared. It is vital that everything that happens is carefully recorded by the member of staff dealing with the incident in a clear, factual way as documents to be stored in the files of the perpetrator and victim. Conversations with parents should also be noted and added to the students' files.

It is vital to keep parents informed of the action you are taking. There's nothing more frustrating or upsetting for a parent than to wait by the phone for a promised call which never comes or to have emails ignored. This often leads to the problem escalating to the point where children are removed from school.

If the bullying behaviour continues, then sanctions will follow (such as removal of the perpetrator from social time at break and lunch, exclusion from lessons while being kept in isolation, or in more serious cases, fixed term or permanent exclusion).

## **Parents**

This policy is available to parents on the school website so that they are clear that BGS does not tolerate bullying, that we take any concern about bullying seriously and that parents are aware of the procedures which follow if they believe their child is being bullied. We hope parents will reinforce the value of good behaviour at home.

## **Teachers**

At BGS staff are encouraged to identify issues which could develop and proactively gather intelligence. Teachers are advised that if they think that bullying is happening, they should talk to the students concerned and ask them what has occurred, ensuring that a written record is made and passed on to the relevant Head of Year. Duty staff are directed to be vigilant and sensitive to the potential of bullying situations. Staff training will include information about tackling bullying.

Records of bullying, including cyberbullying are kept, partly to evaluate the effectiveness of the approach adopted and to enable patterns of behaviour to be identified.

At BGS, bullying of staff, whether by pupils, parents or colleagues, is unacceptable. It is not acceptable for pupils, parents or colleagues to denigrate and bully school staff via social media in the same way that it is unacceptable to do so face to face. Staff should report their concerns to the Headmistress if they feel they have been subjected to bullying behaviour.

### **How the anti-bullying policy is supported in the curriculum**

Issues such as bullying, friendships and related topics are raised in our Personal, Social and Health Education Programme, and in other lessons such as English and Drama.

Issues are raised in assembly themes e.g. friendship, mutual respect, being different, tolerance, often led by students, in order to place emphasis on prevention of bullying. The importance of peer disapproval of anti-social behaviour is underlined; the positive aspects of 'community-friendly' behaviour are stressed, and the importance of avoidance of prejudice-based language

Visits from police speakers to students and parents describe the criminal laws which apply to harassment and threatening behaviour, and which address issues of grooming, inappropriate internet sites and the sharing of photographs or personal information without permission

Workshops on anti-bullying are held or attended from time to time by students to raise awareness of the benefits of a positive culture of kindness.

The issue of cyberbullying is dealt with in ICT lessons, during digital citizen days and assemblies. We have an e-Safety Policy of which the students and staff are made aware. All students, when issued with iPads, are asked to sign the Student's pledge for iPad Use where they agree to follow the policy outlined in the Technology for Learning Acceptable Use Policy.

In the Senior School we believe that we educate the students to be able to use their mobile phones and iPads in a sensible way. They can keep them in their bags or pockets and should only use them in class if directed to do so. All students are trained in correct and appropriate use of their iPads.

Anti-Bullying Week leads to heightened consciousness of pupils and staff through posters, discussions in form time, in Student Voice Forum and assemblies. We address anti-bullying issues throughout the year. We refer to this national campaign alongside our anti-bullying strategies.

House points can be given to students who show characteristics of kindness or support for others.

Students are able to use computers, laptops and iPads in the Learning Resources Centre and elsewhere in the school; our ICT lessons cover the need for care and attention to appropriate language, content and correct usage.

The Pastoral and Co-curricular Sub-Committee of Governors and the students from the Girls' Leadership Group who are leading the Anti-Bullying Campaign, along with our student led Anti-Bullying Ambassadors also have an opportunity to comment on the Policy.



## Useful links

CEOP (Child Exploitation and Online Protection Centre)	<a href="http://www.ceop.police.uk">www.ceop.police.uk</a>
Anti-bullying alliance	<a href="http://www.anti-bullyingalliance.org.uk/">http://www.anti-bullyingalliance.org.uk/</a>
Kidscape	<a href="http://www.kidscape.org.uk">www.kidscape.org.uk</a>
Restorative justice in schools	<a href="http://www.restorativejustice.org.uk/restorative-practice-schools">www.restorativejustice.org.uk/restorative-practice-schools</a>
Diana award	<a href="http://diana-award.org.uk/">http://diana-award.org.uk/</a>
LGBT advice	<a href="http://www.schools-out.org.uk/">http://www.schools-out.org.uk/</a>

## BGS PARENTAL COMPLAINTS PROCEDURE:

Appendix 7

See BGS Website (Policies Section) for latest Parental Complaints Policy