Accessibility Plan — London

In Toto Ed Group Ltd

Policy reference: SG38

Applies to

Site	Applies (Yes / No)
In Toto Ed London — Independent Special School	Yes
In Toto Ed Cambridge — Independent Special School	No
In Toto Ed Peterborough Post-16 Provision	No

This plan is specific to In Toto Ed London. Each provision has its own accessibility plan because the physical environment, the roll and the barriers differ. SG40 is the short group policy that sits above the three plans.

Document control

Policy reference	SG38
Version	V2.1
Status	Approved
Policy owner (role)	Head of School, In Toto Ed London, with the SENCO
Author	Simon Gunton, Proprietor
Approved by	Emily Gunton, Proprietor and Head of School
Date approved	11/10/2026
Date of last review	First issue of this rebuild; supersedes V2.0
Review cycle	Annual
Next review due	Autumn term 2027, then annually within the period ending 31/08/2029
Statutory or regulatory basis	Equality Act 2010, Schedule 10, paragraphs 3 and 4. See section 1.
Publication	Provided on request from the London office, in large print or another format if asked. Published in line with the group publication matrix. Provided to commissioners, inspectors and the Secretary of State on request.
Equality impact considered	This plan is itself an equality document. See section 10.
Personal data processed	No — see section 11.
Related policies	See section 12.

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1. What this plan is, and the period it covers

This is the accessibility plan for In Toto Ed London, required by paragraph 3 of Schedule 10 to the Equality Act 2010. It replaces SG38 V2.0.

1.1 The period

This plan covers three years, from 1 September 2026 to 31 August 2029. Schedule 10 requires a plan to be made for a period and to be kept under review during that period, so the period has to be stated. It is reviewed annually, in the autumn term, and revised during the period if the review shows it should be.

1.2 What the duty actually requires

Paragraph 3(2) sets out three things a plan must address, and this plan is built in those three parts and no others:

- increasing the extent to which disabled students can participate in the curriculum — Part A below;
- improving the physical environment, so that disabled students can take better advantage of the education, benefits, facilities and services offered — Part B;
- improving the delivery of information to disabled students in a form as accessible to them as it is to students who are not disabled — Part C.

1.3 It is directly inspectable

Paragraph 3(7) provides that a relevant inspection may extend to how the responsible body performs its functions in preparing, publishing, reviewing, revising and implementing the plan. Paragraph 3(8) defines a relevant inspection to include an inspection under Chapter 1 of Part 4 of the Education and Skills Act 2008, which is the regime under which In Toto Ed London is inspected.

1.4 Who is responsible for it

Under paragraph 6(5)(c) of Schedule 10, the responsible body for an independent educational institution is The Proprietor. For In Toto Ed London that is the proprietors of In Toto Ed Group Ltd. The plan is prepared, approved, reviewed and implemented on their authority.

In Toto Ed has no governing body, and the distinction matters here rather than being a point of wording. A governing body is a corporate body constituted under section 19 of the Education Act 2002 with statutory functions of its own; Schedule 10 paragraph 6(6) defines it that way and applies it only to maintained schools. The In Toto Ed Advisory Board is not that. It advises, it scrutinises, and it holds specific delegated functions recorded in the proprietors' minutes — for example the independent panel in an ending of placement, and authorising access where an allegation concerns a proprietor. It does not approve this plan and it is not the responsible body for it. SG38 V2.0 referred to a governing body twice. That was inherited from a maintained-school template and is corrected here.

The annual review is reported to the Advisory Board for scrutiny. The decision to approve or revise the plan rests with the proprietors.

2. Who this plan is for

Every student at In Toto Ed London has social, emotional and mental health needs, and most have an Education, Health and Care plan. In practice that means substantially all of them meet the Equality Act definition of a disabled person: a physical or mental impairment with a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities. Under the SEND Code of Practice, long-term means a year or more and substantial means more than minor or trivial. The definition takes in sensory impairments and long-term health conditions such as asthma, diabetes, epilepsy and cancer.

That has a consequence this plan has to state plainly. In a mainstream school an accessibility plan concerns a minority of students. Here it concerns almost all of them, which means accessibility is not an adjustment made at the edges of what the school does. It is the ordinary work of the school, and the targets below are written on that basis.

Most students have also experienced significant trauma. A barrier to access at In Toto Ed London is as likely to be a sensory, emotional or relational one as a physical one, and the plan addresses both.

2.1 Students who have not yet been admitted

Paragraph 6(4) of Schedule 10 provides that a disabled student includes a disabled person who maybe admitted to the school. The duty therefore looks forward, not only at the current roll.

In practice this means the plan has to be capable of answering a question from a local authority considering a placement: can this provision meet this child's access needs? GSP6 Admissions section 6 sets the pre-admission checks. Where an access need cannot be met, the honest answer is given at the consultation stage rather than after a placement has started.

As at the date of this plan In Toto Ed London has 92 students on roll and 46 staff.

3. Part A — Participation in the curriculum

Schedule 10 paragraph 3(2)(a). Costs are stated against each target; section 7 explains the resourcing position.

Target	Where we are now	What we will do, and by when	Lead and cost
A1. Every member of staff is trained in inclusive teaching and disability awareness	Disability awareness is part of mandatory induction. There is no record of which of the 46 current staff have completed it, and no refresher cycle. SG38 V2.0 recorded this target as "Ongoing" with no baseline, owner or date.	Build a training record showing completion for every member of staff. Set a refresher every two years. Report completion as a figure at each annual review of this plan. First complete record by 19 December 2026.	SENCO & Assistant SENCO Nil — delivered in existing training time
A2. Published curriculum resources meet an agreed	Resources are published for students to use. Whether an individual resource is accessible has	Agree a minimum accessibility standard for published resources — readable fonts, symbol support where needed,	Assistant Head Teaching & Learning

accessibility standard	never been checked against a standard, and no standard has been agreed.	no information carried by colour alone, alternative text on images. Tracked in Learning Walks overseen by the Assistant Head Teaching & Learning, from September 2026.	Nil — delivered in existing training time
A3. Assistive technology is provided to the students who need it	SG38 V2.0 recorded individual devices for students in Key Stages 3 and 4 as an aim. Clicker to be trialled for all students.	Clicker trial put in place from January 2027.	Head of School and SENCO Cost to be established
A4. Therapy strategies are used in lessons, not only in therapy	Therapy is commissioned as part of each student's plan. Strategies are shared with teaching staff.	Record each student's therapy strategies in their PEN Portrait, and sample their use in termly learning walks. In place from September 2026.	SENCO and Assistant SENCO Nil
A5. No student is excluded from enrichment by their disability	Trips, work experience and community visits are risk-assessed under HS12. Whether any student has in practice been unable to attend because of an access need is not recorded.	Record, for each off-site activity to ensure students are able to access a broad set of trips and enrichment activities. Recording from the spring term 2027.	Deputy Head Nil

5. Part B — The physical environment

Schedule 10 paragraph 3(2)(b). This is the part of the plan where the previous issue was weakest, and the first target explains why everything else here depends on it.

Target	Where we are now	What we will do, and by when	Lead and cost
B1. An access audit, which this plan depends on	No access audit has been carried out at 1 Cresswell, St Agnes House and Number 5.	Commission an access audit of 1 Cresswell, St Agnes House and Number 5 against Approved Document M and the Equality Act, carried out by a competent external assessor. The audit produces a written, costed and prioritised schedule of works. Assessor appointed by 19 December 2026. Audit complete by 31 March 2027.	Premises lead with the proprietors Cost of the audit to be obtained; it produces the costed schedule for everything below
B2. A funded programme of works, in priority order	Cannot be stated until B1 is complete.	The proprietors consider the audit schedule with the Chief Financial Officer, agree an order of priority and a funded programme. Decision by 31 July 2027. Programme reported at each annual review.	Proprietors with the Chief Financial Officer See section 7

B3. Regulating and sensory spaces remain fit for purpose	A sensory room and the Hub are in use and are overseen by the SENCO.	Confirm at each annual review that both spaces remain fit for purpose and that the conditions at SG63 section 4.2 are being met. Student consultation in the spring term 2027.	SENCO and Assistant SENCO Nil cost
B4. Lighting, signage, acoustics, flooring and furniture	SG38 V2.0 described textured flooring in each room, acoustic treatment where necessary, clear signage, neutral colours, low-stimulation classrooms and the removal of bright white lighting.	Assessed within the B1 audit rather than as a separate exercise, so that one competent assessment covers the whole physical environment.	Premises lead Within B1
B5. Personal emergency evacuation plans	NOT IN PLACE AS A RECORDED SYSTEM. SG38 V1.2 did not mention personal emergency evacuation plans at all. The Cambridge plan does. For a provision where students have sensory, medical and mobility needs, that is a gap rather than an omission in drafting.	A personal emergency evacuation plan for every student who needs one, and for any member of staff or regular visitor who needs one. Complete by 19 December 2026. Reviewed annually and after any change in need. Tested in a drill each term.	Group Director for Safeguarding and Student Welfare Nil cost
B6. Outdoor space supports regulation as well as play	Outdoor space is used for sensory breaks and regulation. Its accessibility has not been assessed.	Included in the B1 audit brief, covering surfaces, gradients, seating, shade and the route from teaching spaces to outdoor space. Within B1, by 31 March 2027.	Premises lead Within B1

6. Part C — Delivery of information

Schedule 10 paragraph 3(2)(c) and 3(3). The second of those is the one both previous issues missed.

Target	Where we are now	What we will do, and by when	Lead and cost
C1. We know what format each family actually wants, and use it	SG38 V2.0 listed a long range of formats the school can produce — large print, audio, digital, symbol support, Makaton, translation, and others. Nothing records what any individual student or family has said they prefer. Paragraph 3(3)(b) requires the way information is delivered	Add a communication-preference field to the admission process and to each annual review: preferred format, preferred language, preferred contact method, and anything that should never be used. In place for new admissions from April 2027. Captured for every student on roll by 31 August 2027.	SENCO and Head of School Nil

	to be determined after taking account of the student's disabilities and any preferences expressed by them or their parents. A capability list does not meet that; a recorded preference does.		
C2. Written communication is in plain language	SG38 V2.0 committed to short words and the active voice. No letter has been checked against that commitment.	Sample three communications sent to families each term against a readability check, and rewrite any that fail. Report at each annual review. From the spring term 2027.	Head of School Nil
C3. Students can understand information about their own school	Visual timetables, now-and-next boards and communication aids are in use. Whether a student can actually find and understand information about their school — the day, the rules, who to tell, how to complain — has not been checked with students.	Produce a student-facing version of the information students most need, in the formats the section 3 consultation says they want. Ensure students can access the help and support pages on the website. By 31 July 2027.	SENCO, Head of School with the Lead Student Support Nil
C5. This plan is available to anyone who asks	Schedule 10 paragraph 4(2) requires the proprietor to make a copy available for inspection on request. Both previous issues stated the plan would be on the website; the group publication matrix governs what is published there and what is made available on request.	A copy is provided on request from the London office, in large print or another format if asked. Published in line with the group publication matrix. Provided to commissioners, inspectors and the Secretary of State on request, as paragraphs 4(2) and 4(3) require. Immediate and continuing.	Group Director of Safeguarding and Student Welfare Nil

7. Resources

Paragraph 4(1) of Schedule 10 requires the responsible body, in preparing a plan, to have regard to the need to allocate adequate resources for implementing it. Neither previous issue mentioned resources or cost at all.

Accessibility work is funded case by case, considered by the proprietors with the Chief Financial Officer as each need arises.

- The access audit at B1 is what makes case-by-case funding workable. Until the audit exists, the proprietors are deciding on requests one at a time with no view of the whole. Once it exists, they are working from a costed and prioritised schedule, which is a different and far more defensible exercise.
- Where an item on that schedule is not funded, the decision and the reason are recorded in the annual review. The duty is to have regard to the need to allocate adequate

resources, not to fund everything; but a decision not to fund has to be a decision somebody took and can account for, not an absence.

Every target in Parts A and C above is costed at nil, because each is a change to practice and recording rather than a purchase. The costs in this plan sit almost entirely in Part B, and they cannot be stated until B1 reports.

8. Monitoring, review and implementation

Reviewed annually in the autumn term by the Head of School with the SENCO, and reported to the proprietors. The first review falls in the autumn term 2027.

9. Local arrangements at In Toto Ed London

Everything above applies at In Toto Ed London. The arrangements below are particular to this provision and are recorded so that the plan describes a real place rather than a generic school.

Three buildings, not one

Accessibility at London means accessibility across 1 Cresswell, St Agnes House and Number 5. A student may be taught in more than one of them. The access audit at B1 covers all three, and a finding in one building is not answered by the position in another.

Arrival and departure

Most students arrive by taxi or public transport. Staff meet students at arrival and support them to their first session. Arrival is supervised from 8.30am.

Regulating spaces

A sensory room and the Hub are in use and are overseen by the Lead Student Support.

Therapy

Therapy is commissioned as part of each student's plan and delivered on site. Strategies are intended to carry into the classroom, which is target A4.

10. Equality, and what this plan does not do

This plan addresses the three things Schedule 10 requires and does not attempt to be the school's whole response to disability. Reasonable adjustments for an individual student are made under the Equality Act whether or not they appear here, and the duty to make them is anticipatory and continuing — it does not wait for a target date in this document. Nothing in this plan limits an adjustment that a student needs now.

Equally, this plan is not the SEND policy, the SEN information report, or an individual student's plan. It is the strategic document that sits above them and says what the school is changing about itself.

A large-print copy of this plan is available on request. So is a copy in another format.

11. Personal data

This plan contains no student or staff personal data. Delivering it involves processing some: the communication preferences at C1, the PEEP information at B5, and the PEN Portrait entries at A5. Each is processed under HR4, the data protection policy, on the basis of legal obligation

— the accessibility planning duty in Schedule 10 to the Equality Act 2010 — and legitimate interests, with health and disability information handled as special category data under the Article 9(2)(g) substantial public interest condition. Public task is not relied on; see HR4 section 4.1 and HR4 Appendix C section 9. Retention follows HR4 Appendix A. The surveillance entries at A5 relate to the processing assessed in SG64.

12. Related policies and documents

The access audit report and works programme (once B1 reports) · GSP6 Admissions Policy · the SEND policy and SEN information report for London · HS23 Supporting Students with Medical Conditions · HS21 Allergy Safety Policy · HS12 Educational Visits and Outdoor Learning · HS3 Health and Safety and the fire risk assessments · SG63 CCTV Policy and SG64 CCTV Data Protection Impact Assessment · GSP30 Complaints Policy · HR10 Equality, Diversity and Inclusion · HR4 Data Protection Policy and Appendix A · SG61 Safeguarding Contacts and Named Roles Annex · the group publication matrix · SG40 Accessibility Policy, the short group policy that sits above this plan.

13. Version history

Version	Date	Author	Summary of changes
V2.0	see 1.1	as recorded in that issue	Superseded by this issue.
V2.1	01/10/2026	Simon Gunton, Proprietor	Full rebuild on the current template, structured on the three limbs of Schedule 10 paragraph 3(2). States the three-year period the plan covers, which no previous issue did. Corrects the responsible body: the proprietor under paragraph 6(5)(c), not a governing body — the previous issue's references to a governing body came from a maintained-school template. Adds the paragraph 6(4) duty to prospective students, the paragraph 3(3) requirement to record individual communication preferences, the paragraph 4(1) resourcing position, and the paragraph 3(7) point that the plan is directly inspectable. Replaces every target previously marked "Ongoing" with a baseline, a named lead, a date and a cost. Adds an access audit as the target the physical-access limb depends on, and records that none has ever been carried out. Adds surveillance as a potential barrier to participation, following the confirmation on 1 October 2026 that all classrooms are covered by CCTV. Removes the consultation claim that no record supports, and replaces it with dated consultation actions. Reassigns actions previously given to posts that do not exist.