



# Reasonable Adjustments in Schools

Wales 2024

In partnership with

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# Introduction

**This guidance is intended to support early years, schools and other settings in understanding and acting on their obligations under the 'Equality Act 2010', and the interface with the 'Additional Learning Needs and Education Tribunal (Wales) Act 2018', and the 'Additional Learning Needs Code for Wales (2021)', in relation to children and young people with a vision impairment.**

It has been developed with specialists, including qualified teachers of the vision impaired (QTVIs), other professionals, and National Sensory Impairment Partnership (NatSIP) partners working in the vision impairment sector. As such, it represents views from professionals on best practice in this area, based on statutory obligations.

## Definitions

**The Equality Act 2010 defines disability as 'a physical or mental impairment that has a substantial and long-term adverse effect on the ability to carry out normal day-to-day activities.'**

Children and young people with a vision impairment would all qualify under this definition and therefore would be covered by the provisions of the Act.

In Wales, the Additional Learning Needs and Educational Tribunal (Wales) Act 2018 defines 'additional learning need'. According to the Act, children with a vision impairment would be classed as having an additional learning need.



# Reasonable adjustment duty

**Reasonable adjustments are changes that can be made in schools to help disabled pupils take part in education on the same basis as other students.**

Schools and other settings have a duty to plan adjustments for disabled pupils generally, including in relation to the curriculum, physical environment of the school, and access to information. The duty for schools to make reasonable adjustments only applies to students with a disability. Where a school places a student with a disability at a disadvantage compared to other students, the school must take reasonable steps to try to overcome that disadvantage.

For example, a pupil with a vision impairment who can only read text comfortably in 16pt font or larger will be at a substantial disadvantage compared to non-disabled pupils, if materials are only provided in smaller print.

**There are 3 parts to the reasonable adjustment duty in the Equality Act 2010:**

- 1. Provisions, criteria and practices**
- 2. Physical features**
- 3. Auxiliary aids and services**



## Provisions, criteria and practices

**The requirement to make adjustments to any provision, criteria or practice relates to the way in which a school works on a daily basis.**

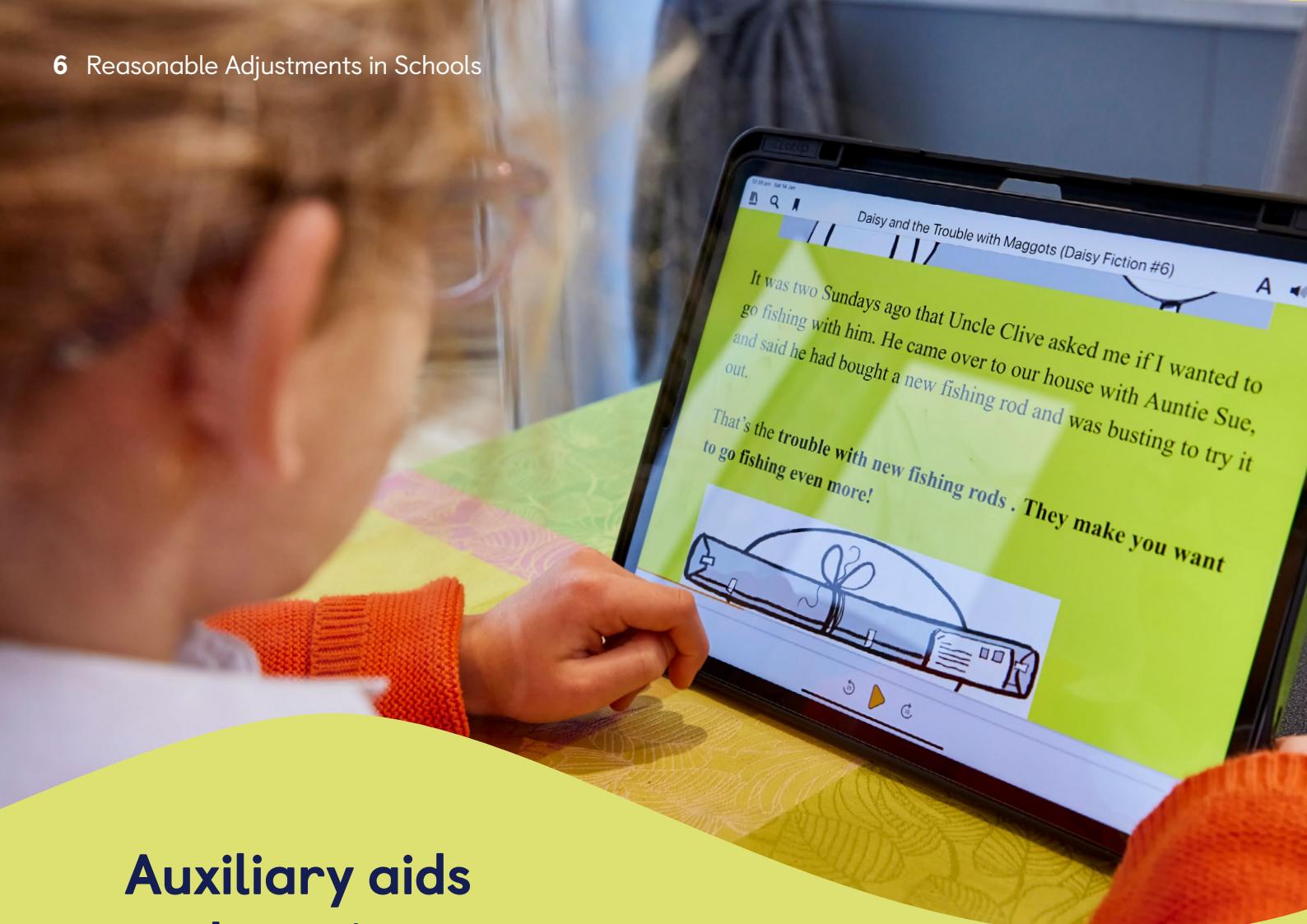
This includes its decisions and actions, how they deploy resources, and the practices that they follow. This applies irrespective of whether the provision, criteria or practice is written down.

## Physical features

**The physical features element does not apply to schools in relation to individual disabled pupils; instead, schools have a duty to plan better access for disabled pupils generally.**

This includes in relation to the physical environment of the school. While schools and other settings are not required to meet the physical access needs of an individual pupil, it will often be good practice to make the changes. If alterations are specified in an Additional Learning Need or an Individual Development Plan, the Local Authority has a duty to make them.





## Auxiliary aids and services

**Schools will be expected to provide an auxiliary aid or service for a student with a disability when it would be reasonable to do so and if such an aid would alleviate any 'substantial disadvantage' that the student faces in comparison to students without a disability.**

'Substantial' can be defined as being anything considered more than minor or trivial. Whether a disabled pupil can be considered at a substantial disadvantage or not will depend on their individual situation.

A failure to make reasonable adjustments so that disabled children are not placed at a substantial disadvantage is also a form of discrimination.

**The Equality and Human Rights Commission (EHRC) gives examples of auxiliary aids which include:**

- Extra staff assistance
- An electronic or manual notetaking service
- Audio-visual fire alarms
- Readers for people with vision impairments
- Assistance with guiding
- An adapted keyboard
- Specialised computer software

## **The EHRC suggests the following considerations around reasonableness:**

- The resources of the school and the availability of financial or other assistance.
- The financial and other costs of making the adjustment.
- The extent to which taking any particular step would be effective in overcoming the substantial disadvantage suffered by a disabled pupil.
- The practicability of the adjustment.
- The effect of the disability of the individual.
- Health and safety requirements.
- The need to maintain academic, musical, sporting and other standards.
- The interests of other pupils and prospective pupils.

**It is also important to put these duties in the context of the general ALN duties.**

Where a child or young person is covered by ALN and the Equality Act, reasonable adjustments and access arrangements should be considered as part of planning and review.

## **It should also be noted that:**

- It is not possible for a school to justify a failure to make a reasonable adjustment. If the adjustment is reasonable, it must be provided.
- Schools, along with other service providers, cannot pass the cost of making a reasonable adjustment on to families. Changes should be covered from a school's Additional Learning Need (ALN) budget. If there is already provision through the ALN framework, schools can take this into account.
- The fact that a disabled pupil has an Additional Learning Need or an Individual Development Plan, does not take away a school's duty to make reasonable adjustments for that pupil.



## Anticipatory duty

**A school's duty to make reasonable adjustments is an anticipatory duty and therefore schools need to plan in advance and to have thought about the steps they can put in place to meet the needs of any vision impaired pupil who might join the school.**

The duty to make reasonable adjustments applies to all benefits, facilities and services that schools provide for students, not just curriculum access. This includes all school activities such as extra-curricular and leisure activities, work experience, after school and homework clubs, sports activities and school trips.

In anticipating and planning for future needs as part of their anticipatory duties "schools ...need only consider general reasonable adjustments e.g. being prepared to produce large font papers for pupils with a vision impairment even though there are no such pupils currently admitted to the school. Such a strategic and wider view of the school's approach to planning for disabled pupils will also link closely with its planning duties" (The Equality Act 2010, Section 4.22 – Department for Education).



# Habilitation support

**Habilitation is the teaching of movement and mobility skills, including spatial awareness, long cane use and independent living skills.**

Specialist support is provided by qualified Habilitation Specialists who support children and young people with vision impairment, at home or within an educational setting, from nursery through school. The positive impact of habilitation in ensuring that a child or young person with vision impairment can access all aspects of school is well recognised.

To the extent that these skills are needed within the educational setting, they would be specifically covered by the school's duty to provide a reasonable adjustment. As such, schools would be expected to implement recommendations and programmes of work developed by Habilitation Specialists.



# Checklist of potential adjustments and support

**It can be helpful to break down the different areas that schools and settings need to consider.**

The following pages include guidance about some of the typical adjustments or auxiliary aids that should be considered when thinking about children with vision impairment.

While these suggestions provide some examples of best practice, they are not exhaustive. The needs of children and young people with a vision impairment are diverse and adjustments should be made according to the needs of the individual student, within the specific context.

# Checklist: Potential adjustments or considerations for the development of best practice

## The curriculum

- Provide written materials, including homework, in accessible formats: large print, audio, electronic or braille. These must be sensitive to the needs of the individual student with a vision impairment.
- Provide individual copies of interactive whiteboard presentations in large print or in an accessible electronic format.
- Ensure an appropriate seating position for students and ensure appropriate lighting.
- Use modified teaching strategies to enable full curriculum access and understanding (including PE, Drama, Tech subjects and Science).
- Use appropriate and accessible communication approaches for students, e.g:
  - Visual/tactile symbols, spoken, sign language, sign systems including the deafblind manual alphabet, on-body signing.
  - Use objects of reference/tangible symbols, tactile symbols, auditory/vocal.
  - Visual/tactile access to dual communication boards, including technology that relies on communication through various kinds of switches.
  - Augmentative and alternative communication (AAC).
  - Spoken word, working with scribes.
- Facilitate the development of tactile graphicacy skills to promote and facilitate access to two and three-dimensional representational material such as tactile maps, diagrams, pictures, and other graphical and figurative material.
- Support their ability to choose specific approaches (or combinations of approaches) to access information in particular contexts (e.g. exam skills, in lessons and independent study).
- Use specialist software to facilitate the usability of school IT systems.

## Assessments and exams

- Provide exam papers (including past papers) in accessible formats such as modified large print, braille or accessible electronic formats (adjustments apply to internal and external examinations and practice opportunities).
- The setting should allocate and train a suitable scribe, reader and practical assistant, fluent in braille where appropriate.
- Accommodate the student appropriately for an assessment, taking into account any need for extra time and rest breaks, and with consideration for potential disruption arising from others leaving the exam room before them. Access to suitable space away from the main exam room may be needed.
- Ensure the student has access to, and is familiar with, appropriate specialist equipment.
- Ensure a glare free environment with good lighting.

## The extended curriculum

- Consider a buddy system to promote social inclusion.
- Use an agreed visual prompt when starting a race or a match e.g. a coloured flag or sound.
- Arrange theatre visits when there is an audio described performance and/or a touch tour.

## Wider participation

- Include students with vision impairment on the school council and/or ask their views on issues that are discussed at school council.
- Run a lunchtime/after school inclusive activity club e.g. inclusive sports, braille for all.
- Make sure after school clubs are accessible to all.
- Whenever reasonable, arrange transport to pick up students after the end of a school club, rather than at the end of the normal school day, to enable participation.
- Seek guidance from the QTVI when undertaking an appropriate risk assessment prior to trips. This could include offering pre-learning opportunities to enhance access.

## Classroom management

- Ensure that the student is addressed by name to get their attention.
- Minimise visual distractions and optimise the visual environment.
- Place the student's seating in the optimum position in relation to the teacher, adult support, and the board, and ensure good lighting.
- Take into account their level of vision and visual field.
- Check with the student that they are well positioned. If there is individual sensory guidance in place, make sure it is followed.
- It is good practice to engage and collaborate with external agencies and other professionals for specific strategies/guidance and provision that meets the needs of the student.

## Access to information

- Embed strategies which will be used in tests, exams or assessments as the normal way of working.
- Provide the student with their own copy of resources.
- Make appropriate modifications to print resources and information.
- Check with the student if there is specialist advice in place, and make sure it is followed.
- When information is presented, ensure it is always done so in a user-friendly way for pupils with visual impairments e.g. by reading aloud text and describing diagrams.

## The physical environment

- Use contrasting colours to highlight door frames, pillars, and steps. External steps will benefit from tactile paving at the top and bottom.
- Include handrails on stairs that extend beyond the top and bottom of the stairs.
- Ensure appropriate lighting in all student areas.
- Provide suitable storage for bags and coats to prevent floor obstructions.
- Remove trip hazards e.g. floor mats that are not flush with the floor level.
- Display appropriate signage e.g. large print or braille, or objects of reference.
- If required, provide access to quiet areas for 1-1 work.

- Allow for storage space, particularly for pupils who require large amounts of resources/equipment.
- Provide easy access to electrical sockets.

## **When working with a Habilitation Specialist to ensure safe access in the physical environment**

- Consider with a Habilitation Specialist whether the student will be using mobility aids, including from an early age, and how to accommodate for these. This would include a full range of potential mobility aids, e.g. various canes, guide dog, electronic devices (including specialist apps and equipment), smart wheelchair with switch. It may also include a sighted guide.
- The decisions of an appointed Habilitation Specialist might impact what adjustments you should make. Here are some aspects of habilitation support that you may want to understand:
  - Does the student have a structured approach to develop independence, self-organisational skills, and functional life skills, appointed by a Habilitation Specialist?
  - Does the student have a short-term or long-term programme, being delivered by a Habilitation Specialist?
  - Does the student have Cerebral Vision Impairment (CVI)/complex needs/ is non-ambulant (wheelchair user)/has developmental mobility or balance and co-ordination issues affecting independent mobility?
  - Is the student receiving support from an Occupational Therapist or Physiotherapist?

## **Social Education and Mental Health (SEMH)**

- As with all students, it is the school's duty to support their SEMH. This also applies to students with a vision impairment.

## **Auxiliary Aids-Technology**

- Provide specialist teaching from a qualified professional, experienced in working with vision impaired students, for touch typing and the use of keyboard shortcuts, supporting them to produce work and access information.
- Ensure effective access to Wi-Fi.

- Ensure educational technology (EdTech) in a setting allows each individual to use assistive technology in the way that's most effective for them. Any EdTech changes planned by a setting may be subject to an equality impact assessment.
- Facilitate personalisation of surroundings and use of accessibility features on mainstream devices e.g. increasing the size of the mouse pointer and enabling speech support tools.
- Provide mainstream and/or specialist hardware appropriate to the individual's needs e.g. DAISY book readers, braille notetakers and switches.
- Provide assistive technology software appropriate to the individual's needs e.g. for screen-sharing, high-level magnification and music composition.
- Enable the use of school-relevant technology through working with the individual student to fulfil their access needs e.g. mobile phones apps (including specialist apps such as image recognition tools, navigation apps, transportation apps, speech input software, as appropriate).
- Ensure access to e-learning, for example through use of a virtual learning environment that the individual can access efficiently, or by presenting the learning in an alternative, more accessible format.

For more examples of interventions please also refer to Guide Dogs' Reasonable Adjustments Good Practice Case Studies, and the Curriculum Framework for Children and Young People with Vision Impairment (CFVI)  
[www.rnib.org.uk/cfvi](http://www.rnib.org.uk/cfvi)

# Exclusions

## 1. Exclusion from specific activities

Students should not be excluded from any school activities without it first being considered whether there is an adjustment which could be reasonably made, or additional support provided to enable participation e.g. for activities or trips.

## 2. School exclusion

The duties that ensure reasonable adjustments are considered and made need to be followed in any discussion about excluding a student with a vision impairment from a school or setting. The report 'Exclusion from schools and pupil referral units' from the Welsh Government states that "the 2010 Act does not prohibit schools from excluding learners with a protected characteristic but does prohibit schools from excluding learners because of their protected characteristic (e.g. excluding a disabled learner because of their disability or because of their racial group) or discriminating unlawfully during the exclusions process. This applies to permanent and fixed-term exclusions. It is direct discrimination to exclude a learner because they are perceived to have a protective characteristic or because they are associated with someone with a protected characteristic. It is also unlawful to exclude a learner with a protective characteristic for behaviour that a learner without a protective characteristic would not be excluded for."

It could be unlawful discrimination for a student to be excluded for behaviour that is connected to their disability. Whether an exclusion is justified will depend on whether the school has met its duty to implement reasonable adjustments for that individual. If disruptive behaviour is as a result of reasonable adjustments not having been made for a child with a disability, the school should identify and address causes of behaviour first, before moving to exclusion.

# Resources

This briefing is not intended as a definitive guide to law in this area.

Please consult the guidance below for a full account of your legal obligations in this area.

- The Equality Act 2010 (Disabled School Pupils) (Wales) Regulations 2021: [www.gov.wales/equality-act-2010-disabled-school-pupils-wales-regulations-2021](http://www.gov.wales/equality-act-2010-disabled-school-pupils-wales-regulations-2021)
- Additional Learning Needs and Education Tribunal (Wales) Act 2018: [www.gov.wales/additional-learning-needs-and-education-tribunal-wales-act](http://www.gov.wales/additional-learning-needs-and-education-tribunal-wales-act)
- Additional Learning Needs Code for Wales (2021): [www.gov.wales/additional-learning-needs-code](http://www.gov.wales/additional-learning-needs-code)
- Planning to increase access to schools for disabled pupils -Welsh Government (2018): [www.gov.wales/sites/default/files/publications/2018-04/planning-to-increase-access-to-schools-for-disabled-pupils.pdf](http://www.gov.wales/sites/default/files/publications/2018-04/planning-to-increase-access-to-schools-for-disabled-pupils.pdf)
- Exclusion from Schools and Pupil Referral Units in Wales – Welsh Government (2019): [www.gov.wales/sites/default/files/publications/2019-11/exclusion-from-schools-pupil-referral-units.pdf](http://www.gov.wales/sites/default/files/publications/2019-11/exclusion-from-schools-pupil-referral-units.pdf)
- What Equality Law Means for You as an Education Provider in Wales: A Guide for Schools – EHRC (2014): [www.equalityhumanrights.com/sites/default/files/what\\_equality\\_law\\_means\\_for\\_you\\_as\\_an\\_education\\_provider\\_in\\_wales\\_schools.pdf](http://www.equalityhumanrights.com/sites/default/files/what_equality_law_means_for_you_as_an_education_provider_in_wales_schools.pdf)
- Curriculum Framework for Children and Young People with Vision Impairment (CFVI) (2023) – RNIB: [www.rnib.org.uk/cfvi](http://www.rnib.org.uk/cfvi)
- Planning to increase access to schools for disabled pupils – Welsh Government (2018): [www.gov.wales/increasing-access-disabled-pupils-planning-guidance](http://www.gov.wales/increasing-access-disabled-pupils-planning-guidance)
- A guide for parents on school behaviour and exclusion (2023) [www.gov.uk/government/publications/school-exclusions-guide-for-parents/a-guide-for-parents-on-school-behaviour-and-exclusion](http://www.gov.uk/government/publications/school-exclusions-guide-for-parents/a-guide-for-parents-on-school-behaviour-and-exclusion)
- Making childhood equal: The need to increase habilitation support for children and young people with vision impairment – Thomas Pocklington Trust and Guide Dogs (2020): [www.pocklington.org.uk/wp-content/uploads/2020/11/Making-Childhood-Equal-Habilitation-Research-2020-compressed.pdf](http://www.pocklington.org.uk/wp-content/uploads/2020/11/Making-Childhood-Equal-Habilitation-Research-2020-compressed.pdf)
- Guide Dogs' Reasonable Adjustments Good Practice Case Studies, 2024



## **Guide Dogs is the UK's largest charitable provider of services for children and young people with vision impairment.**

We provide a range of service including information, advice and guidance, assistive technology products and support, and large print books through our CustomEyes service.

Guide Dogs is a leading provider of habilitation services in the UK. Habilitation is the training and support needed for blind and partially sighted children and young people to gain the skills they need to move around independently.

Alongside our services, we campaign to remove barriers that prevent blind and partially sighted people living the life they choose.

For more information contact:  
**[publicaffairs@guidedogs.org.uk](mailto:publicaffairs@guidedogs.org.uk)**

To find out more about our campaigns, please visit:  
**[guidedogs.org.uk/campaigns](http://guidedogs.org.uk/campaigns)**  
**[@gdcampaigns](https://twitter.com/gdcampaigns)**



NatSIP – the National Sensory Impairment Partnership ([www.natsip.org.uk](http://www.natsip.org.uk)) is a unique national partnership of professionals and the main voluntary and professional organisations working across the sensory impairment sector to improve outcomes for children and young people with SI and their families.

To contact NatSIP please email:  
**[send-reforms@natsip.org.uk](mailto:send-reforms@natsip.org.uk)**