



STAFFORDSHIRE
POLICE

Reasonable Adjustments

Guidance & Information

September 2020

Produced by Staffordshire Police
for FOI 23088

To be used in conjunction with the Reasonable Adjustments Passport when Police Officers and Police Staff (referred to as “employees” throughout this document), including new recruits, have a disability or long-term condition or impairment requiring changes to their working environment or practices.

Contents:

Introduction	3
Purpose	5
Definitions	6
Guidelines	7
Reasonable Adjustment Passport (RAP)	9
Training	9
Monitoring Compliance & Effectiveness	9
Associated Documentation	10
Process Flowcharts	10
Flowchart - Referral	11
Flowchart – Completion of Reasonable Adjustment Passport (RAP)	12



Introduction

We aspire, under our Modern Policing Strategy to be a positive and healthy workplace, where people taking ownership of their own health and wellbeing with wellbeing being at the heart of people's experience of working for us. Our ambition is to create an inclusive workplace where we embrace individuality, value diversity and treat everyone fairly and with compassion and respect. Our aim is to create an inclusive and accessible environment for all which is free from any form of discrimination, disadvantage, victimisation, and harassment or bullying. We will not tolerate discriminatory attitudes, behaviours or practices, whether these are due to prejudice, stereotyping, thoughtlessness or ignorance.

We expect everyone working in and with Staffordshire Police to adhere to and uphold our commitment to our Values and to behave in accordance with them and the College of Policing's Code of Ethics and the Police Staff Standards of Professional Behaviour.

Staffordshire Police recognises that true equality of opportunity and inclusion cannot be guaranteed by a 'one size fits all' approach to policies and practices. Some employees are likely to be placed at a greater disadvantage by certain workplace arrangements than others, especially when they have a long-term health condition or a disability. Consequently, in order to treat people fairly, it may be necessary to treat them differently. Some individuals might be placed at a substantial disadvantage by the physical features of the premises where they work, including their work station, desk, chair, etc. and others may require flexibility of approach in relation to location (for instance agile working) and times of work (i.e. changes to shift patterns or rotas).

We are committed to creating a more diverse workforce which includes increasing the numbers of people we employ who have both visible and hidden disabilities and long-term conditions. In order to do this, we recognise we need to act more inclusively and recognise people's abilities and what they can do rather than focus on what they find difficult.

We acknowledge that tackling unconscious, subconscious and conscious bias is the key to this along with our taking action to level the playing field between those with disabilities and those without. We want there to be complete equality in all of our processes and practices, including promotion and development, and for individuals not to feel marginalised or be lacking in opportunities because they declare a disability or long-term condition. We will monitor this and take action to tackle unfairness and inequality in all its forms.



Adjustments on health grounds have a critical role to play in enabling individuals to work on equal terms. Any necessary adjustments should be identified and put into place swiftly and efficiently and always in consultation with the individual concerned. It is important to note that often individuals with a disability or long-term condition will not want to declare that they have one. This is okay and perfectly acceptable, particularly if they do not require any adjustments to be made to support them in their role. There is a significant amount of stigma surrounding disability and lots of evidence to suggest that disabled people can get treated less fairly because of it. However, if an individual requires adjustments because of their disability or long-term condition, then they will need to have a conversation with their line manager or supervisor to enable the relevant support to be given.

If an individual has a disability or long-term health condition that means they require support at work, this policy and process should be followed. It is recommended that a Reasonable Adjustment Passport (RAP) should be completed for everyone requiring adjustments in the workplace.

Although not a specific legal duty for the organisation, as an employer of choice we recognise that we have an obligation and a responsibility to support those individuals who have other complex health needs that don't fall under the Equality Act's definitions (such as employees going through the menopause or with IBS, for example). This also extends to those employees with caring responsibilities and those who require our support because of their individual situation or circumstances at a particular time. We will use this guidance in conjunction with the family and other leave policies to ensure that we meet the needs of these individual members of staff in a supportive and collaborative way.

Where a staff member returning to work following an injury requires some temporary transitional arrangements, for example a leg injury where access to the workplace could be difficult, this process should be used to manage the rehabilitation period. Whilst this particular situation would not normally meet the criteria set out in the legislation, it might do in the case of a short term acute disabling condition. Each case should be treated on an individual and 'case by case' basis. Another example may be where a colleague has a mental health condition that they are recovering from and a flexible return to work, which may be longer and more flexible than the norm, would support their needs. Managers who are unsure as to whether they should be supporting their employee to complete the Reasonable Adjustment Passport should take advice from their HR Officer or a member of the Disability and Carers Network (contact details on the intranet).

Workplace environment issues such as room temperature and/or lighting preferences do not sit under this guidance and should be resolved by individual line managers.



This guidance will also be used at the recruitment stage to support individuals who are applying for a job with us or who are wishing to progress within the organisation. Consideration of a persons' individual needs will be taken account of and support provided throughout the selection and appointment process. These adjustments will need to be made in a timely manner and before an individuals' commencement in post. Consideration of an individual's needs in terms of the promotion process (e.g. examinations and interview processes) and when moving into a new job role is also necessary and adjustments will need to be put in place to ensure there are no barriers to access or opportunity.

When considering any return to work intervention, careful planning is required. This should be done in collaboration with the individual concerned and, where appropriate, the HR Officer together with the Occupational Health, Safety Wellbeing Team.

Action to provide the adjustment should be started within seven working days of its initial identification. It is important that an individual requiring adjustments can be confident that they will be met without unnecessary delay.

Purpose

The purpose of this guidance is to provide individuals and their line managers with detailed information about their duties and responsibilities in respect of positively enabling workplace adjustments. It also provides a mechanism, through the Reasonable Adjustment Passport, to request and consider an adjustment or adjustments whether this be on health grounds or because of a disability or impairment. There are a variety of arrangements that can be made to achieve this (see section on **Adjustments**).

This guidance represents the understanding of Staffordshire Police on compliance under the Equality Act 2010.

Duties

Equality Act 2010 – Disability (protected characteristic)

Under the Equality Act, the employer has an absolute 'duty' to make 'reasonable adjustments' to workplace arrangements for an officer, member of staff or potential new recruit with a disability or long-term condition. Below is a description of what managers need to do so that the force meets its legal obligations to disabled applicants and those currently working for us by quickly making those adjustments which will enable individuals, with dignity, to access, retain and be empowered to excel in their employment. Managers should, in particular, be familiar with the support available to them from the Occupational Health, Safety & Wellbeing Team and the Government's Access to Work Scheme (set out below) as well as the content of an individual's Reasonable Adjustment Passport ([RAP](#)).



STAFFORDSHIRE
POLICE

Employees are not obliged to disclose personal medical information to their employer unless required by law. However, they will need and are expected to disclose how their medical condition is likely to impact on their functional ability to do their job, so that they can be appropriately supported in their role and that their absence and subsequent return to work can be managed effectively.

Definitions

Reasonable Adjustments – Under the Equality Act disabled people can be treated more favourably in order to ensure equality of outcome. The Equality Act places a requirement on employers to make reasonable adjustments to ensure disabled employees are not substantially disadvantaged. Adjustments include changes to working policies and practices in addition to the physical features of any premises and taking into consideration:

- Mental health issues
- Learning difficulties and disabilities
- Sensory impairments
- Physical Impairments
- Progressive conditions

Disability Definition

For the purposes of the Equality Act, disability is defined as a physical or mental impairment which has a substantial and long term adverse effect on a person's ability to carry out normal day to day activities. For the purposes of the Act:

substantial means neither minor or trivial

long term means that the effect of the impairment has lasted or is likely to last for at least 12 months (there are special rules covering recurring or fluctuating conditions)

normal day-to-day activities could include everyday things like eating, washing, walking and going shopping

a normal day-to-day activity must affect one of the 'capacities' listed in the Act, this could include mobility, manual dexterity, speech, learning, seeing and memory.

People who have had a disability in the past that meets this definition are also covered by the scope of the Equality Act. There are additional provisions relating to people with progressive conditions.



People with HIV, cancer and multiple sclerosis are deemed to be covered by the Equality Act effectively from the point of diagnosis, rather than from the point when the condition has some adverse effect on their ability to carry out normal day-to-day activities.

Disability Discrimination

Disability discrimination is the less favourable treatment because of, or for a reason related to, a person's disability or a failure to make a reasonable adjustment. Even if the discrimination, harassment or victimisation is unintentional it will still be against the law.

The Equality Act also includes protection from discrimination by association and discrimination by perception. For more information please contact the Diversity and Inclusion Team or a HR Advisor.

Guidelines

Reasonable Adjustments

Reasonable adjustments can take many forms. These can include the provision of specific equipment or hardware such as a specialist chair, a laptop with specific computer software on, a portable or fixed loop system, etc. It can also be other forms of support such as the provision of a British Sign Language (BSL) signer, a support worker, the introduction of either permanent, semi-permanent or fixed-period flexible working hours, agile working (working away from the office in another location or at home), either permanent or temporary adjustment to an individual's job description and duties or lessening the demands of the job for a period of time where the individual is recovering from health issues, etc.

Many adjustments will have no or little cost to implement. If there is a cost, the Government's Access to Work Scheme (see below) may be able to help. It can fund up to 100% of the costs of adjustments prior to employment, up to 80% of the cost of adjustments for those already employed by the force and 100% of the costs of adjustments such as support workers or BSL interpreters. It is advised that individuals speak to their HR Officer or a member of the Disability & Carers network before contacting Access to Work.

The first point of contact for anyone requiring or needing advice on reasonable adjustments should be their HR Officer/Occupational Health Safety & Wellbeing Team.



The Occupational Health, Safety & Wellbeing Team is there to advise and provide support to individuals. Referral to more specific and specialist assessment, such as for dyslexia is also through Occupational Health/HR Officer. See the flowchart on page 9.

Access to Work – What is it?

It is advised that individuals contact their Line Manager, HR Officer and Occupational Health before making contact with Access to Work.

Access to Work is a specialist disability service delivered by Job Centre Plus, which gives practical advice and support to disabled people, whether they are working, self-employed or looking for employment. Access to Work is provided where someone needs support or adaptations beyond the reasonable adjustments which an employer is legally obliged to provide under the Equality Act.

Access to Work can help employers retain an employee who develops a disability or long term condition (keeping their valuable skills and saving both time and money recruiting a replacement) and to support your employees who have a mental health condition.

Who Is Eligible? To be eligible for help, a person must have a disability or health condition that has a long term substantial adverse effect on their ability to carry out their job.

What type of help is provided? Access to Work can support customers in a number of ways. For example it can provide funds towards:

- Special aids and equipment
- Adaptations to equipment
- Travel to work
- Travel in work
- Communication support at interviews
- A wide variety of support workers, and
- The Mental Health Support Service

Access to Work does not provide the support itself, but provides a grant to reimburse the cost of the support that is needed. 100% grants are available for people starting a job or people who have less than 6 weeks service when they first apply.

When cost sharing applies, Access to Work may refund up to 80% of the approved costs between a threshold and £10,000. The force may contribute 100% of costs up to the threshold level (£1,000) and 20% of the costs between the threshold and £10,000. Any balance above £10,000 will normally be met by Access to Work.

For current levels of support contact Access to Work direct or visit their website at <https://www.gov.uk/access-to-work>.



STAFFORDSHIRE
POLICE

Reasonable Adjustment Passport (RAP)

Employees requiring workplace adjustments that have a disability or long-term health condition need to complete a Reasonable Adjustment Passport (RAP). The preferred approach is for this to be completed in collaboration with their line manager, however in situations where another route is necessary, an individual can self-refer or seek support from the next in their chain of command or their Staff Network / Association, Union or Police Federation. Alternatively, individuals can contact the Disability & Carers network for support. The RAP has been designed by the Disability and Carers Network to support employees and ensure that they continue to receive ongoing support from their managers and HR Advisor. A copy of the RAP is [here](#).

Training

This guidance and approach to workplace adjustments will be actively communicated across the force to ensure that all employees have an awareness and understanding of their role and responsibilities.

Monitoring Compliance and Effectiveness

Managers are responsible for recording requests and outcomes for adjustments on the employees' personal file. A copy of an individuals' RAP and any updates to it should also be on the employees' personal file. Managers will be required to update HR that the RAP has been completed so that it can be recorded on Origin. Monitoring of RAP's may be undertaken to ensure that adjustments have been put in place and that they meet quality standards. Individual RAP's will be kept in accordance with Data Protection protocols and used only for reference and monitoring purposes.



Associated Documentation

This guidance links to the following policies/documents:

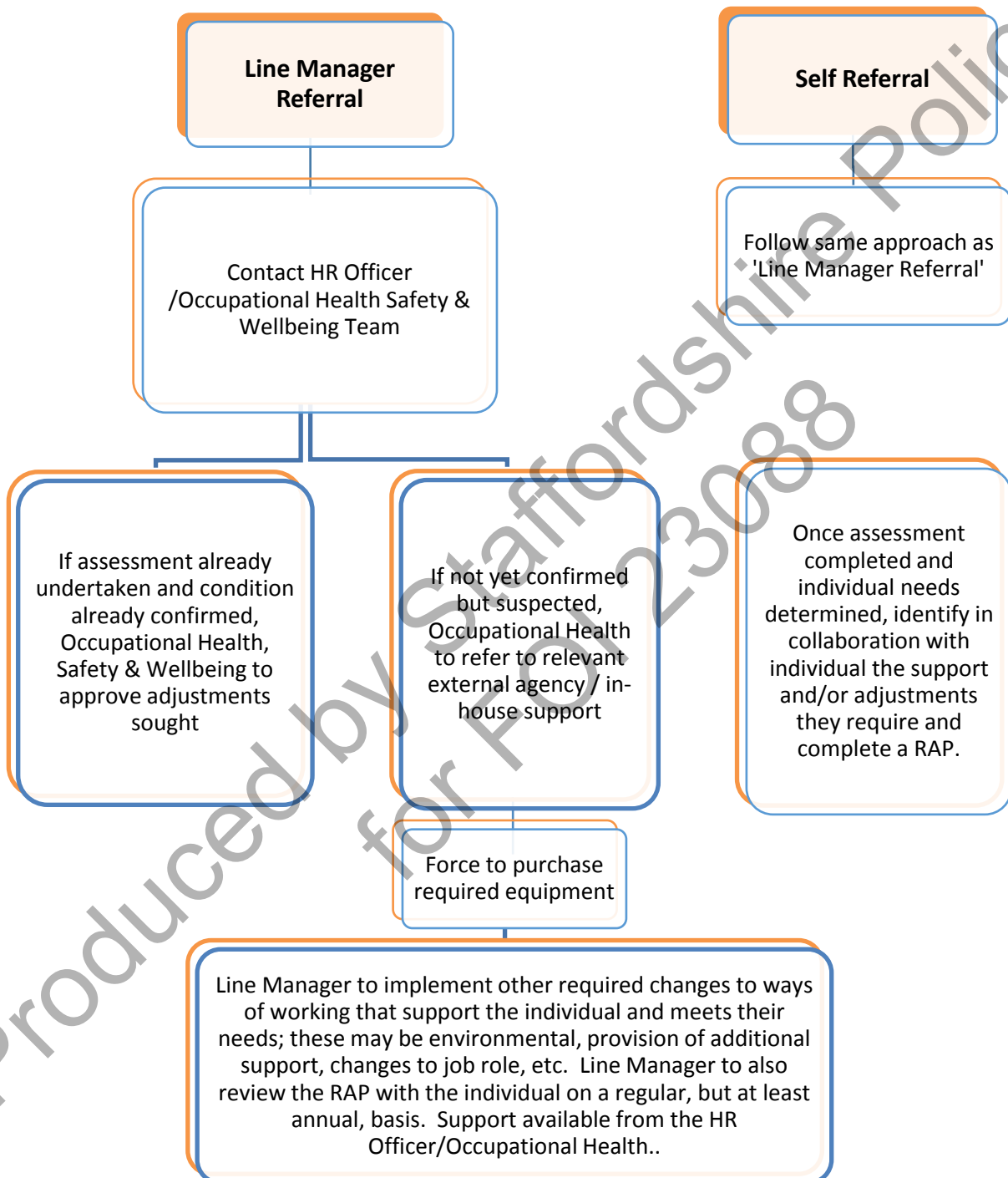
- Reasonable Adjustment Passport (RAP),
- Sickness Absence Policy
- Capability Policy
- Resolution Guidance
- Health and Safety Policy, including the policy around risk assessments and Personal Emergency Evacuation Plan (PEEP).

Process Flowcharts

The first flowchart below shows the route from identification of need through to approval for all workplace adjustments. The relevant referral for any specific assessment should be completed at the same time or prior to completion of the Reasonable Adjustments Passport:



Flowchart: Referral



Flowchart: Completion of Reasonable Adjustment Passport (RAP)

