

Reasonable Adjustments Policy

Introduction

We are working hard to promote equality and ensure that our services and the information, advice, and guidance we provide is inclusive and accessible to everyone. We want Torbay to be a place where everyone thrives. As a Disability Confident organisation, we are committed to meeting our Public Sector Equality duties under the Equality Act.

This policy sets out our approach to reasonable adjustments. It aims to inform our employees, partners and customers about the steps we are taking to ensure that our services are accessible. It provides information about what people can expect to happen when they inform us about a reasonable adjustment that they require. It also includes examples of how we could adjust the way we deliver our services to meet the needs of our customers.

Scope

This policy is for all managers and staff engaged by Torbay Council. It applies to everyone who wishes to use our services. It does not apply to maintained schools or academies unless specifically adopted by the relevant body. This policy refers specifically to service delivery, there is a separate policy in place for workplace reasonable adjustments.

What is a disability?

Disability is a broad term and is used to describe learning disabilities, physical conditions, mental health conditions and differences in sensory processing that have a substantial and long-term effect on a person's ability to conduct their normal day-to-day activities. A long-term effect is one that has lasted, or is expected to last, for 12 months or more. In addition, people with hearing, visual and speech impairments, and conditions such as cancer, HIV, diabetes, and asthma can also fit the definition of having a disability. It is important to remember that a disability may be visible or non-visible.

What is a reasonable adjustment?

The Equality Act provides protection to those with protected characteristics. People who have a disability have protection to stop them from being disadvantaged. Reasonable adjustments are changes to the way we deliver our services to help people that have a disability to access our services. The Equality Act requires that we put in place Reasonable Adjustments where required.

Our Public Sector Duty requires that we take steps to promote equality and advance opportunity between those who have a protected characteristic and those who do not. It may be appropriate in certain cases to make an adjustment to the way a service is delivered to achieve this even though the person does not have a disability. For example, when someone speaks English as an additional language and needs a translator and/or requires documents to be translated.

Our approach to reasonable adjustments

We take steps in advance to remove barriers that people may face to accessing our services by building accessibility into the way we deliver our services and provide information. To ensure that our services are accessible, we:

- Provide language interpretation including British Sign Language
- Publish easy read versions of key consultation information
- Ensure that our buildings and external venues are accessible where possible
- Regularly review the information on our website to ensure that it meets the Government's accessibility standards
- Provide an opportunity for our customers to tell us that they have a disability/reasonable adjustment requirement via our customer self-service portal, My Torbay
- Adhere to our branding and language guidelines to ensure that our documents are easy to understand
- Flag on our customer relationship management software if a customer contacting us via the call centre has a known requirement for a reasonable adjustment
- Complete equality impact assessments to help us identify if our decisions could negatively impact different people

How we provide reasonable adjustments

We will always consider requests for adjustments to make it easier for people with disabilities to access our services, but we are only required under the Equality Act to provide adjustments that are reasonable for us to make. Reasonable adjustments will vary depending on an individual's needs and circumstances. Examples of the support that we may be able to put in place include:

- Providing a printed version of an electronic document
- Communicating with someone over the telephone instead of via email
- Providing a written record of a conversation
- Providing a hearing loop in meeting rooms
- Changing the time of an appointment to help a person manage the symptoms of a health condition
- Supporting a person to make a paper-based rather than online application to access a service

Putting in place a reasonable adjustment

When a customer tells us that they have a disability, long-term injury or health condition and is experiencing difficulties in accessing our services, we will work with the person to identify what we can do to help them to access our services more easily. We know that disabilities and the impact that they can have on someone's life can change and we recognise that people may have temporary and/or multiple impairments and needs. Customers are encouraged to contact us at the earliest opportunity if they require a reasonable adjustment or if their needs change.

When a customer requests a reasonable adjustment, we take a person-centred case-by-case approach to identifying a customer's requirements and deciding if the request would be reasonable. We use the Equality and Human Rights Commission's guidance to help us reach a decision on if a reasonable adjustment is reasonable. We consider:

- How effective the reasonable adjustment will be in improving the accessibility of the service/information
- The practicality of putting in place the adjustment
- The cost of putting in place the adjustment
- Our ability to financially resource/support the adjustment

It is important to remember that there is no fixed definition of what is reasonable. Although it may be difficult to put in a place a reasonable adjustment, that by itself is not a reason for not putting one in place.

On the rare occasion where it is not possible to put in place an adjustment, this should be clearly communicated with the customer and recorded. All reasonable steps should have been taken to put in place the adjustment.

Expectations for our employees

Our core values of being adaptable, forward thinking, people-orientated and acting with integrity are at the heart of everything we do. We expect our staff to act in accordance with our core values and our Customer Service Standards. Our employees are expected to treat members of the public with respect and dignity and to communicate in an approachable and accessible manner.

We expect our employees to work with our customers to identify if they need a reasonable adjustment and to support our customers to put in place reasonable adjustments that meet their needs.

Employees must consider if a customer requires a reasonable adjustment during their first interaction with any customer. Employees should ask the customer if they require adjustment rather than make assumptions about what an individual may or may not require.

If reasonable adjustments have been identified, these should be agreed with the customer and put in place in a timely manner. Employees are expected to regularly review the reasonable adjustments in place to ensure that they are still meeting the customer's needs. Employees are expected to record this information using their usual departmental processes for capturing information about their customers.

Feedback and complaints

If you would like to raise a concern or complaint about our process for reasonable adjustments, in the first instance you should contact the department who you have been dealing with. If after contacting them, you are not happy with their response you may wish to make a formal complaint.