



**West Hampshire**  
Clinical Commissioning Group

# **SUPPORTING STAFF WITH MENTAL OR PHYSICAL DISABILITIES (REASONABLE ADJUSTMENTS) POLICY**

**Version 1**

<b>Subject and version number of document:</b>	Supporting Staff with Mental or Physical Disabilities (Reasonable Adjustments) Policy Version 1
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<b>Author:</b>	Head of Equality, Diversity and Inclusion
<b>CCG owner:</b>	Director of Quality and Board Nurse
<b>Links to other policies:</b>	<ul style="list-style-type: none"> <li>• Conduct, Performance, Grievance &amp; Absence Management Policy</li> <li>• Dignity &amp; Respect Policy</li> <li>• Learning &amp; Development Policy</li> <li>• Leave &amp; Flexible Working Policy</li> <li>• Lone Working Policy</li> <li>• Organisational Change Policy</li> <li>• Probationary Period Policy</li> <li>• Recruitment and Exit Procedure</li> <li>• Stress Management Policy</li> <li>• Policy on Abuse, Harassment and Violence Against Staff</li> </ul>
<b>Review date:</b>	January 2021
<b>For action by:</b>	All CCG staff, line managers, applicants to posts and volunteers.
<b>Policy statement:</b>	<p>This policy sets out the CCG approach to supporting and managing staff with:</p> <ul style="list-style-type: none"> <li>• A physical disability</li> <li>• Sensory disability (e.g. a visual or hearing impairment)</li> <li>• A learning disability (e.g. dyslexia, dyscalculia, Attention Deficit/ Hyperactivity Disorder)</li> <li>• Autism spectrum disorder (Autism, Asperger's syndrome)</li> <li>• A diagnosed long-term health condition, including a physical or mental health condition.</li> </ul>
<b>Responsibility for dissemination to new staff:</b>	Line managers as part of new staff induction.
<b>Mechanisms for dissemination:</b>	All new and updated policies are promoted to staff through the internal staff newsletter and

	the policy page on the intranet, and are published on the CCG website.
<b>Training implications:</b>	Line Mangers will need to be aware of and use this policy. The policy will be referenced in the Line Manager Toolkit
<b>Resource implications</b>	Some reasonable adjustments may require the CCG to provide specialist equipment or extra resources. This will be considered on a case-by-case basis. For new employees it may be possible to apply for a grant from Access to Work.
<b>Further details and additional copies available from:</b>	Website: <a href="https://westhampshireccg.nhs.uk/document-tag/hr-policies/">https://westhampshireccg.nhs.uk/document-tag/hr-policies/</a>
<b>Equality analysis completed?</b>	This policy has been assessed for equality impact. The policy aims to have a high positive impact for potential and existing employees with a disability or long-term health condition. The policy helps the CCG to meet its duties under the Equality Act 2010.
<b>Consultation process</b>	<ul style="list-style-type: none"> <li>• Executive Team</li> <li>• Staff with long-term health conditions and disabilities at two focus groups on 14 May 2019, as well as one-to-one meetings</li> <li>• Members of the Staff Forum</li> <li>• Directorate Teams</li> <li>• Staff Partnership Forum</li> <li>• Learning and Growth</li> </ul>
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**Amendments summary:**

Amend No	Issued	Page(s)	Subject	Action Date
1				
2				
3				
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5				

**Review log:**

Include details of when the document was last reviewed:

Version Number	Review Date	Reviewer	Ratification Process	Notes

# **SUPPORTING STAFF WITH MENTAL OR PHYSICAL DISABILITIES (REASONABLE ADJUSTMENTS) POLICY**

## **SUMMARY OF KEY POINTS TO NOTE**

This policy sets out the CCG approach to supporting and managing staff with a physical, sensory or learning disability, autism spectrum disorder or a diagnosed long-term health condition, including a physical or mental health condition. It applies to people with an existing disability, mental health or other long-term health condition that apply for jobs at the CCG; current employees of West Hampshire CCG who have a pre-existing disability, or other long-term mental or physical health condition and current employees of the CCG who develop a long-term mental or physical health condition or who become disabled. Specifically:

- Recruiting managers should ensure that disabled applicants are not unfairly disadvantaged during the recruitment process and that appropriate adjustments are made. The basis for selection decisions will be related to the job description and person specification for that role. Disability is not part of the decision making process and issues relating to disability will only be addressed once the decision has been reached regarding the best person for the job.
- All managers must, when it is known that an employee has a disability, complete with the member of staff the process and documentation of the Disability Passport. Even if the employee does not feel they require any reasonable adjustments at this time, the Disability Passport should still be completed by the manager. This will evidence the conversation and have an agreed plan in relation to the on-going contact to discuss the wellbeing of the individual. This should be at a minimum of once per year as required for all staff with a disability as a part of the Disability Confident Scheme.
- The Equality Act 2010 requires that reasonable adjustments are made to working conditions, policies and practices that put a member of staff with a disability at a disadvantage.
- A reasonable amount of paid and pre-agreed disability leave will be granted when disabled people, who are not sick for other reasons, require time off as a result of their disability. This may be:
  - To attend treatment appointments with respect to their impairment/ disability
  - Hearing aid tests or assessments for conditions such as dyslexia
  - In respect of technical aids or equipment needing fitting/ adjustment/ mending
  - Training with a guide or hearing dog
  - To facilitate veterinary treatment for an assistance dog
  - Counselling/ therapeutic treatment or physiotherapy
  - Dialysis treatment
  - Treatment for long term or recurring cancer
  - Blood tests for diabetes, cancer or other conditions, and treatment or tests and recovery time.



# SUPPORTING STAFF WITH MENTAL OR PHYSICAL DISABILITIES (REASONABLE ADJUSTMENTS) POLICY

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# **SUPPORTING STAFF WITH MENTAL OR PHYSICAL DISABILITIES (REASONABLE ADJUSTMENTS) POLICY**

## **1. INTRODUCTION AND PURPOSE**

- 1.1 This policy sets out the West Hampshire Clinical Commissioning Group (CCG) approach to supporting and managing staff with:
- A physical disability
  - Sensory disability (for example a visual or hearing impairment)
  - A learning disability (dyslexia, dyscalculia, Attention Deficit/ Hyperactivity Disorder)
  - Autism spectrum disorder (Autism, Asperger's syndrome)
  - Or a diagnosed long-term health condition, including a physical or mental health condition.
- 1.2 In particular, the policy aims to help managers to:
- Create a workplace and organisational culture that is welcoming, compassionate and respectful of people who have a mental illness, a disability or a long-term health condition
  - To meet their legal obligation to consider and make reasonable adjustments in the workplace under Section 20 of the Equality Act 2010
  - To avoid and remove discrimination against applicants and employees who have a disability.
- 1.3 This policy also supports the CCG's work to implement and make progress against the NHS Workforce Disability Equality Standard.
- 1.4 Supporting principles:
- Job applicants, candidates and staff have the right to be treated fairly and with dignity and respect
  - This policy reflects our CCG values of compassionate, inclusive, fair, honest and ambitious, and helps us put these values into action
  - The CCG is committed to meeting the Equality Act 2010 duties by eliminating discrimination, advancing equal opportunities and fostering good relations for people with protected characteristics, including those with a disability.

## **2. SCOPE AND DEFINITIONS**

### **2.1 Scope**

This policy applies to:

- People with an existing disability, mental health or other long-term health condition that apply for jobs at the CCG
- Current employees of West Hampshire CCG who have a pre-existing disability, or other long-term mental or physical health condition
- Current employees of the CCG who develop a long-term mental or physical health condition or who become disabled.

### **2.2 Definitions**

#### **2.2.1 What is a disability?**

The CCG is using the definition of 'disability' set out in the Equality Act 2010. This states that a person is disabled if:

- They have a physical, visual, hearing or speech impairment, mental health issues, learning difficulty/ disability or severe disfigurement and includes any impairment, which is likely to develop over time, such as cancer, Multiple Sclerosis (MS) or Human Immunodeficiency Virus (HIV)
- This has an adverse effect on the ability to carry out normal day-to-day activities
- The adverse effect is substantial
- The adverse effect is long-term (meaning it has lasted for 12 months, or is likely to last for more than 12 months or for the rest of their life).

A person who has cancer, HIV or MS is deemed to be disabled from the point of their illness being diagnosed.

The Equality Act also covers people that have had a disability in the past. For example, if you had a mental health condition in the past which lasted for over 12 months, but you have now recovered, you are still protected from discrimination because of that disability.

In determining if a person has a disability, it is important to think about the effect of the impairment without treatment. The Act says that any treatment or correction should not be taken into account, including medical treatment or the use of a prosthesis or other equipment (for example, a hearing aid). The only things which are taken into account are spectacles or contact lenses.

Detailed [guidance](#) on what to take into account in determining questions relating to the definition of disability has been produced by the Government Office for Disability Issues.

## **2.2.2 Different types of disability discrimination**

The Equality Act 2010 gives protection against discrimination due to disability in several ways:

- Direct discrimination
- Indirect discrimination
- Discrimination arising from disability
- Discrimination due to a failure to make reasonable adjustments
- Harassment.

For more details see [Appendix A](#), and refer to the CCG [Equality, Diversity and Human Rights Policy](#).

This policy aims to be a source of advice for line managers so that discrimination is avoided.

## **2.2.3 Reasonable adjustments (Section 20 of the Equality Act 2010)**

The Equality Act 2010 requires that reasonable adjustments are made to working conditions, policies and practices that put a member of staff with a disability at a disadvantage.

The purpose of making a reasonable adjustment is to ensure that the person with a disability is not disadvantaged, compared to a non-disabled person in doing their job. The Act allows that, due to the additional barriers faced by people with disabilities, they can be treated more favourably than their non-disabled colleagues.

When considering if an adjustment is reasonable, employers should think about:

- How effective the change will be in removing, reducing or preventing the disadvantage (what someone may otherwise experience if the adjustment was not to be made)
- The practicality of making the adjustment
- The cost of the adjustment
- The employer's resources and size
- The availability of financial support (from Access to Work).

Reasonable adjustments to the work environment are usually very easy to achieve through effective day-to-day management processes such as flexible working which is available to all employees (see the CCG Leave and Flexible Working Policy). These changes are often low, or no cost.

A reasonable adjustment could include any of, or a combination of, the following:

- Making adjustments to premises
- Acquiring and modifying equipment
- Providing a reader or interpreter
- Reallocating some of a disabled employee's duties to another person (for example 'job carving')
- Providing supervision or other support
- Transferring the individual to fill an existing suitable vacancy without competitive interview
- Altering working hours
- Assigning the employee to a different place of work
- Allowing them to be absent during working hours for rehabilitation, assessment or treatment
- Giving them, or arranging for them to be given, training or mentoring
- Modifying procedures for testing or assessment
- Employing a support worker
- Modifying disciplinary or grievance procedures.

### **3. PROCESS / REQUIREMENTS**

#### **3.1 Identifying a disability**

3.1.1 There are a number of ways in which disability of a member of staff may be identified to the CCG:

- At point of recruitment
- As a result of sickness and/ or sickness absence management
- An injury at work
- Age
- Performance in role

- As a result of changes to requirements in roles
- Through flexible working requests
- As a result of a workforce audit.

## 3.2 Recruitment and selection

- 3.2.1 Recruiting managers should ensure that disabled applicants are not unfairly disadvantaged during the recruitment process and that appropriate adjustments are made.
- 3.2.2 The CCG is a member of the Department for Work and Pensions [Disability Confident Scheme](#). This means that:
- All job adverts placed by the CCG will include the scheme logo to encourage applicants with a disability
  - If an applicant states that they are disabled on their application form and they meet the minimum criteria detailed in the person specification, they must be shortlisted for interview regardless of the total number of applications received
  - The recruiting manager must make sure that any reasonable adjustments required are made, including to tests or assessments as part of the recruitment process, so that disabled applicants are not disadvantaged.
- 3.2.3 The basis for selection decisions will be related to the job description and person specification for that role. Disability is not part of the decision making process and issues relating to disability will only be addressed once the decision has been reached regarding the best person for the job.
- 3.2.4 It is essential that the job description clearly describes what is required for the post to ensure the applicant, manager and Occupational Health team can ascertain any reasonable adjustments that may be required by the post holder.
- 3.2.5 Where the top-scoring candidate has declared that they have a disability, the recruiting manager will need to look at what reasonable adjustments need to be made to remove any substantial disadvantage facing the employee. This will involve the staff member and their new line manager meeting to complete the Disability Passport required by this policy. The process should involve working in partnership with the individual with a disability, and liaise with the HR Advisor and/ or Occupational Health if required. If specialist equipment, ICT or software are needed these should be requested using the Disability Passport and sent to the Head of Equality and Inclusion within two working days of the need being

identified so that equipment can be ordered in good time and so avoid delays in the new recruit starting at the CCG.

- 3.2.6 If reasonable adjustments required by a new employee are substantial (for example a support worker is needed or expensive equipment), the line manager must ask the employee to make an application to Access to Work straight away. The line manager should support the employee to gather information and complete a Disability Passport.

### **3.3 Supporting staff already in employment**

- 3.3.1 Staff already in employment may disclose that they have developed a disability or that they have had a disability for some time. Some employees may not have disclosed their disability before as it may not have interfered with their ability to do their job, but may now find it is impacting on their performance. A manager may discover when conducting a performance management review or dealing with an unacceptable attendance record that the employee has a disability, knowingly or not.
- 3.3.2 All managers must, when it is known that an employee has a disability, complete with the member of staff the process and documentation of the Disability Passport (see [Appendix B](#)). Even if the employee does not feel they require any reasonable adjustments at this time, the Disability Passport should still be completed by the manager. This will evidence the conversation and that there is an agreed plan in relation to the on-going contact to discuss the wellbeing of the individual. This should be at a minimum of once per year as required for all staff with a disability as a part of the Disability Confident Scheme.
- 3.3.3 It is the manager's responsibility to ensure that where a member of staff transfers to a new department that any disability related reasonable adjustments and their Disability Passport transfers with them.
- 3.3.4 Should the employee and the manager have concerns about the employee's ability to do the job and reasonable adjustments are required, the Disability Passport should be completed and if necessary, with the employee's permission, advice and/ or assessments sought from:
- Occupational Health
  - Other health professionals such as specialists and general practitioners (GPs)
  - Head of Equality and Inclusion
  - Health and Safety professionals

- The Government [Access to Work](#) scheme. Access to Work can provide a range of help including assessments and grants to partially cover the cost of equipment/ software, workplace support and training for colleagues.
- 3.3.5 The referral for Access to Work needs to be made by the employee should this be required. The manager will collate the outcomes of the assessments including where appropriate a copy of the Access to Work report, which will be provided by the employee. Based on this information, a discussion will follow between the manager and the employee to ascertain what reasonable adjustments could be made to support the employee to do their job and which do not compromise the health and safety of the employee or others.
- 3.3.6 The reasonable adjustments that are agreed will be entered into the Disability Passport document and a date will be set to review the effectiveness of the reasonable adjustments. This must not be longer than 12 months.
- 3.3.7 A disabled employee may find that if their disability impacts more on their ability to do their job they may need further or different reasonable adjustments. If the employee finds that their disability impacts less on their ability to do their job then reasonable adjustments may be reviewed and amended.
- 3.3.8 In the event of not agreeing reasonable adjustments the manager must inform the employee in writing of the decision and the reasons for making it. If the employee with a disability feels they are being treated unfairly they may appeal using the information/ formal grievance procedure set out in the CCG Conduct, Performance, Grievance and Absence Management Policy.
- 3.3.9 Throughout this procedure the Human Resources Advisor and the Head of Equality, Diversity and inclusion will be able to give advice and guidance to both employees and managers.

### **3.4 Requests for funding of reasonable adjustment**

- 3.4.1 The CCG has a central budget to cover the cost of reasonable adjustments. Requests for funding in relation to reasonable adjustments should be sent to the Head of Equality and Inclusion with all associated documents and recommendations. The Business Manager will record the requests and provide the rationale and authorisation where appropriate for presentation to Finance.

- 3.4.2 Where the cost of a reasonable adjustment is more than £1,000, the individual employee should also make an application to Access to Work for a grant.

### **3.5 Supporting staff with diagnosed mental illness.**

- 3.5.1 Where an employee has disclosed that they have previously been diagnosed with a mental illness and/ or just been diagnosed with a mental illness, the line manager and employee, as a requirement of this policy, will need to meet to discuss the impact in the workplace. In such circumstances, the employee and the manager may deem it appropriate to complete a Disability Passport but this is not mandatory. Where a staff member has had a diagnosed mental health condition that meets the definition of a disability (significant adverse impact for more than 12 months), then a Disability Passport must be completed.
- 3.5.2 The support and possible reasonable adjustments may include discussion regarding how to respond in the event of deterioration in the individual's mental health in the workplace, and agreeing a process for contacting relatives or friends.
- 3.5.3 The CCG recognises the sensitive nature of mental illness and will keep information disclosed by employees confidential, with details only being shared with the consent of the individual employee concerned and on a need to know basis only.

### **3.6 Disability leave**

- 3.6.1 As set out in sections 2.2 and 2.5, there are particular equality implications with respect to impairment and disability (including diagnosed mental illness). If the manager and the employee agree that they are a disabled person under the terms of the Equality Act 2010, there is a duty to make reasonable adjustments.
- 3.6.2 Pre-agreed paid disability leave is a form of reasonable adjustment. These absences are not sickness absence.
- 3.6.3 This policy aims to support better identification and monitoring of disability related needs. This includes understanding when sickness is unrelated to disability, when it is disability related and the circumstances when disability leave should be granted. To help staff and managers understand the difference between sickness, disability related sickness absence and disability leave, use this definition (based on work by NHS Employers):

- **Sickness Absence**
  - **Sickness unrelated to any disability** the employee has (counts towards an employee's overall sickness and recorded in the usual way in the Electronic Staff Record).
  - **Disability related sickness** is a form of sickness absence that is directly or indirectly attributed to a person's disability or long-term condition. Such absences should be flagged by the staff member as being related to disability when notifying their manager of a period of sickness absence.
- **Disability leave** is a form of absence for a short planned appointment. Disability leave is a form of paid leave under an employer's sickness absence pay provisions.

3.6.4 A reasonable amount of paid and pre-agreed disability leave will be granted when disabled people, who are not sick for other reasons, require time off as a result of their disability. This may be:

- To attend treatment appointments with respect to their impairment/ disability
- Hearing aid tests or assessments for conditions such as dyslexia
- In respect of technical aids or equipment needing fitting/ adjustment/ mending
- Training with a guide or hearing dog
- To facilitate veterinary treatment for an assistance dog
- Counselling/ therapeutic treatment or physiotherapy
- Dialysis treatment
- Treatment for long term or recurring cancer
- Blood tests for diabetes, cancer or other conditions, and treatment or tests and recovery time
- To allow participation in research related to a disability.

(N.B. This is not an exhaustive list).

3.6.5 Disability leave can be granted by the line manager on an individual needs basis and following discussion with the employee with a disability (part of identifying needs using the Disability Passport framework. As a guide this can be up to 10 days in each business year (1 April to 31 March). This would be pro rata for part-time employees. In extenuating circumstances managers have the discretion to grant more disability leave than this.

- 3.6.6 Someone who was previously disabled, but who is currently not affected by their disability would be entitled to take disability leave when attending hospital appointments to review their disability. For example somebody who is in remission from cancer would take disability leave to attend appointments to check that their cancer is still in remission.
- 3.6.7 If an employee is the main carer of a child or adult with a disability, it may be appropriate for them to take disability leave if this individual is undertaking any of the activities set out in section 3.6.4. This will be considered on a case by case basis and for guidance please contact the Human Resources Advisor.
- 3.6.8 Some impairments/ disabilities may result in temporary incapacity, for example asthma and epilepsy. In addition, these and other impairments may be made worse by stress or environmental conditions. All these factors must be taken into account when making assessment of absence as a result of a disability. The CCG is committed to trying to retain employees whose sickness results in disability. Line managers should refer an individual to Occupational Health if they need advice on understanding an employee's individual needs.
- 3.6.9 If an employee does not believe they are disabled, or does not wish to be included under the definition then disability leave is not applicable.
- 3.6.10 All requests for disability leave should be discussed with the line manager and recorded in the Disability Leave record section of the employee's Disability Passport (see [Appendix B](#)).
- 3.6.11 All managers must ensure that accurate and comprehensive records of disability leave are kept for their area of responsibility. These records should include date(s), and reasons for absence - it is not acceptable to record reason for absence as unspecified or unknown. Such record keeping will ensure that patterns and trends of disability related absence are identified.
- 3.6.12 Where, as a reasonable adjustment, an agreed level of paid disability leave per annum has been negotiated on an individual basis, as an expected or tolerated level of leave required to manage their disability, then the absence type Special Decreasing Balance would be used to record this in the Electronic Staff Record (ESR). The following should be completed:
- Absence type: Special Decreasing Balance
  - Absence category: Disability Leave
  - The date and the length of time will also be recorded

- If this period of time is for a number of hours this can be recorded within the absence process for the number of hours taken to enable a record to be made.
- 3.6.13 It is the line manager's responsibility to enter the disability leave taken in ESR.
- 3.6.14 The needs and agreed reasonable adjustments outlined in the individual's Disability Passport will need to be reviewed on a regular basis (at least yearly) to ensure adjustments are still effective. Review would also be triggered when the diagnosis/ prognosis has changed (improved or deteriorated), in order to understand whether the agreed support is still adequate or if the passport is still required.

## **4. ROLES AND RESPONSIBILITIES**

### **4.1 Board and Executive Team**

The CCG Board and Executive Team has strategic responsibility to:

- Ensure that a robust system is in place, which will ensure compliance with the Supporting Staff with Mental or Physical Disabilities (Reasonable Adjustments) Policy
- Ensure that all Directors, Managers, Human Resources and Occupational Health staff are fully aware of this policy and are aware of their responsibilities.

### **4.2 Human Resources**

Human Resources have the operational responsibility to:

- Support and advise managers in the use of the procedure and any issues that arise during its implementation
- To provide advice to recruiting managers, including Disability Confident Scheme responsibilities and this policy
- Give support to employees seeking information and support around disability issues
- Manage other procedures that may arise from implementation of this procedure, for example grievance procedures
- Work with the Head of Equality, Diversity and Inclusion to provide advice and support
- Support CCG staff at all levels in the application of this policy and procedure. This will also include providing appropriate guidance to managers to support them further in their responsibilities under this policy

- To ensure the delivery of the Disability Confident Scheme and Time to Change Pledge.

### **4.3 Head of Equality, Diversity and Inclusion**

The Head of Equality, Diversity and Inclusion is responsible for:

- Advising the CCG and its staff about the duties required by the Equality Act 2010 in relation to disability discrimination - eliminating discrimination and establishing equality of opportunity
- The Head of Equality, Diversity and Inclusion will monitor any refusal to provide reasonable adjustments and the reasons why
- In partnership with the Head of Organisational Development, to include the policy and its implementation within Induction and Line Manager training programmes
- Support and advice to managers and HR in the use of the procedure and any issues that arise during the implementation of the procedure
- Give support to employees seeking information and support around disability issues
- To provide training where needed to support the implementation of the policy and the CCGs commitment to tackling discrimination and stigma.

### **4.4 Line Managers**

Line managers are responsible for:

- Ensuring that they and all staff for whom they have responsibility are aware of the policy and ensure that all staff that access the policy follow the correct procedure when requesting reasonable adjustments
- The implementation of this policy in their area
- Ensuring the sensitive, fair, and consistent treatment of staff
- Ensuring that all staff in their area are aware of reporting requirements expected of them in relation to requesting disability leave
- Ascertaining as far as possible if a member of staff has a disability, even if they have not disclosed this.

### **4.5 Employees**

Employees are responsible for:

- Making themselves aware of the standards and procedures within this policy and follow the correct processes to utilise the procedure with the support of their manager and Human Resources

- Giving information and consent around their health issues in order that reasonable adjustments are able to be made
- Being aware that knowledge of another employees health issues is categorised under the Data Protection Act as 'sensitive personal data', must be treated as confidential and cannot be forwarded to a third party without consent.

#### **4.6 Occupational Health Department**

Occupational Health is responsible for:

- Giving advice to staff and managers on issues relating to health at work. This may include the assessment of reasonable adjustments, facilitating a return to work, including phased returns for a member of staff and whether or not a member of staff is able to return to carry out the duties under their contract of employment
- The Occupational Health Department may also identify if counselling or any other specialist services are required to facilitate the return to work of an individual employee
- The Occupational Health Department will provide a copy of the Occupational Health Report to the member of staff.

### **5. TRAINING**

- 5.1 Awareness of this policy will be included in the Induction programme for new staff and the Line Manager Training. It is anticipated that most other issues will relate to individual disability/ need, and will be resolved through the involvement of specialist expertise from Human Resources, Occupational Health and Access to Work. If new training needs are identified following implementation and use of this policy, these will be addressed.

### **6. EQUALITY ANALYSIS**

- 6.1 The CCG is committed to equality, diversity and inclusion for all, as well as to meeting the Public Sector Equality Duty (Equality Act 2010). Both new policies, and existing policies when reviewed, come within the Public Sector Equality Duty.
- 6.2 This policy has been assessed as having a high positive impact on people with characteristics protected by the Equality Act, and in particular that of disability. A full equality impact assessment has been completed ([see Appendix C](#)).

## **7. SUCCESS CRITERIA / MONITORING THE EFFECTIVENESS OF THE POLICY**

7.1 Compliance with and effectiveness of this policy will be evaluated on an annual basis using the following measures and criteria (anonymised to maintain confidentiality):

- Number of Disability Passports completed (anonymised)
- Review of requests for reasonable adjustments agreed and turned down, broken down by equality characteristics and directorate
- NHS Staff Survey results for the CCG
- Progress against the relevant NHS Workforce Disability Equality Standard indicators
- Number of grievances raised about disability related issues
- Rates of sickness absence and Disability Leave use (anonymous).

7.2 Review will involve input from Human Resources, Occupational Health, Equality, Diversity and Inclusion, employees with a disability, line managers and senior managers.

## **8. REVIEW**

8.1 This document may be reviewed at any time at the request of either the staff forum or management, or in response to changes in legislation, but will automatically be reviewed after twelve months and thereafter on a biennial basis.

## **9. REFERENCES AND LINKS TO OTHER DOCUMENTS**

9.1 Links to useful documents and resources:

- [ACAS – Disability discrimination](#)
- [Equality and Human Rights Commission](#)
- [GOV.UK - Disability Confident employer scheme and guidance](#)
- [GOV.UK - Employing disabled people and people with health conditions](#)
- [Health and Safety Executive – Health and Safety for disabled people](#)
- [The NHS Staff Council Equality and Diversity Group – Guidance relating to disability for the NHS](#)
- [NHS Employers – An inclusive approach to Disability Leave \(February 2020\)](#)
- [NHS Workforce Disability Equality Standard](#)

- 9.2 To make sure that this policy complies with the law and reflects best practice a range of documents have been used:
- ACAS (2017) *Disability discrimination: Key points for the workplace* London: Advisory, Conciliation and Arbitration Service
  - Department for Work & Pensions (2018) *Guidance: Employing disabled people and people with health conditions* GOV.UK [website](#)
  - Equality and Human Rights Commission (2011) *Equality Act 2010 Statutory Code of Practice: Employment* Statutory Code of Practice Norwich: The Stationary Office
  - The NHS Staff Council Equality and Diversity Group (2014) *Guidance relating to disability for the NHS* London: NHS Employers

## 10. KEY CONTACTS

### **Human Resources**

ConsultHR

Telephone: 0300 561 0200 (press option 2)

Email: [scwcsu.hrsupport@nhs.net](mailto:scwcsu.hrsupport@nhs.net)

### **Occupational Health**

Telephone: 023 8071 3300

### **Head of Equality and Inclusion**

Nick Birtley: 023 8062 2821 or [nickbirtley@nhs.net](mailto:nickbirtley@nhs.net)

### **Business Manager**

Trudie Higby: 023 80627688 or [trudie.higby@nhs.net](mailto:trudie.higby@nhs.net)

## **Appendix A Different Types of Disability Discrimination**

### **DIFFERENT TYPES OF DISABILITY DISCRIMINATION**

The Equality Act 2010 protects against discrimination due to disability in several ways:

#### **Direct discrimination**

This happens when someone treats you worse than another person in a similar situation because of disability. For example:

- During an interview, a job applicant tells the potential employer that he has multiple sclerosis. The employer decides not to appoint him even though he's the best candidate they have interviewed, because they assume he will need a lot of time off sick.

#### **Indirect discrimination**

This happens when an organisation has a particular policy or way of working that has a worse impact on disabled people compared to people who are not disabled.

Indirect disability discrimination is unlawful unless the organisation or employer is able to show that there is a good reason for the policy and it is proportionate.

This is known as objective justification. For example:

- A job advert states that all applicants must have a driving licence. This puts some disabled people at a disadvantage because they may not have a licence because, for example, they have epilepsy. If the advert is for a bus driver job, the requirement will be justified. If it is for a teacher to work across two schools, it will be more difficult to justify.

#### **Discrimination arising from disability**

The Equality Act also protects people from discrimination arising from disability. This protects you from being treated badly because of something connected to your disability, such as having an assistance dog or needing time off for medical appointments. This does not apply unless the person who discriminated against you knew you had a disability or ought to have known.

Discrimination arising from disability is unlawful unless the organisation or employer is able to show that there is a good reason for the treatment and it is proportionate.

## **Discrimination due to a failure to make reasonable adjustments**

Under the Equality Act employers have a responsibility to make sure that disabled people can access jobs as easily as non-disabled people. This is known as the 'duty to make reasonable adjustments'.

Disabled people can experience discrimination if the employer or organisation doesn't make a reasonable adjustment. This is known as a 'failure to make reasonable adjustments'. For example:

- An employee with mobility impairment needs a parking space close to the office. However, her employer only gives parking spaces to senior managers and refuses to give her a designated parking space.

What is reasonable depends on a number of factors, including the resources available to the organisation making the adjustment. If an organisation already has a number of parking spaces it would be reasonable for it to designate one close to the entrance for the employee.

## **Harassment**

Harassment occurs when someone treats you in a way that makes you feel humiliated, offended or degraded. For example:

- A disabled woman is regularly sworn at and called names by colleagues at work because of her disability.

Harassment can never be justified. However, if an organisation or employer can show it did everything it could to prevent people who work for it from behaving like that, you will not be able to make a claim for harassment against it, although you could make a claim against the harasser.

For detailed guidance on the requirements of the Equality Act 2010 in relation to disability in the workplace, see chapters 5 and 6 of the [Employment Statutory Code of Practice](#).

## Appendix B West Hampshire CCG Disability Passport

### WEST HAMPSHIRE CCG DISABILITY PASSPORT

The information provided in this Disability Passport is confidential to the employee and their line manager and Human Resources. It should not be shared with anyone without the written consent of the employee.

A copy of the passport should be held by both the worker and their manager, and if appropriate Human Resources.

<b>Name of employee:</b>	
<b>Employee signature:</b>	<b>Date:</b>
<b>Name of line manager:</b>	
<b>Line manager's signature:</b>	<b>Date:</b>
<b>Team/ department:</b>	
<b>Directorate:</b>	

#### Reasonable adjustments details

<b>My health condition or impairment interacts with barriers within and/ or outside the workplace to create the following impact(s) on me at work:</b>	
<i>This could include: Effect on co-ordination, dexterity, or mobility Effect on mental health Effect on hearing, speech or visual impairment Effect on my ability to interact socially with colleagues Effect of particular working environments (for example open plan offices) Attending medical or counselling appointments</i>	
<b>The following specialist equipment, additional ICT or software are requested:</b> (please send request to Head of Equality and Inclusion)	<b>Date requested:</b>  <b>Date supplied:</b>

<p><b>The following reasonable adjustments have been agreed between me and my manager:</b></p>	<p><b>Date implemented:</b></p>
<p><b>The following reasonable adjustments were discussed but not agreed:</b></p>	
<p><b>Has any additional advice been given or requested? If so, from whom and what date was it requested/ given?</b>  <i>Please attach information to back of this document</i></p>	

**My condition or impairment and work**

Please complete this section if you have a fluctuating condition:

<p><b>On a good day, my disability or health condition interacts with barriers within or outside the workplace to have the following impact on me at work:</b></p>
--

**When things are not so good, my disability or health condition interacts with barriers within or outside the workplace to have the following impacts on me at work:**

**Therefore, I might need the following further reasonable adjustments:**

**Disability leave record**

If applicable, please record disability leave here.

Note: Up to 10 days or 75 hours paid disability leave can be granted April to March for full-time employees, and pro rata for part-time staff. In extenuating circumstances managers can grant more disability leave.

<b>Date</b>	<b>Number of hours</b>	<b>Reason</b>	<b>Balance</b>

## Emergency contacts

This section is for optional emergency contact details.

If I am unwell or there are any urgent concerns about my wellbeing, I am willing for my manager/ management to contact any of the following emergency contacts in the order of preference indicated below.

<b>Relative, partner or family member</b> (preference number:.....)
Name:
Relationship to you:
Telephone numbers: Home:
Mobile:

<b>Friend</b> (preference number:.....)
Name:
Relationship to you:
Telephone numbers: Home:
Mobile:

<b>Specialist/ care-co-ordinator/ support worker/ general practitioner/ nurse</b> (preference number:.....)
Name:
Relationship to you:
Telephone numbers: Home:
Mobile:

<b>Other</b> (preference number:.....)
Name:
Relationship to you:
Telephone numbers: Home:
Mobile:

## Review

The passport and agreed reasonable adjustments should be reviewed six months after the employee's adjustments have been put in place to ensure they are removing any identified workplace barriers. Where they have not been put in place or have not proved useful to the employee, this meeting would ensure adjustments can be actioned or new adjustments could be agreed.

Further reviews will be at the employee's request, or if there is any change to an employee's job, which might create additional barriers, to ensure the adjustments are still appropriate and effective in eliminating workplace barriers.

The employee has the right to be accompanied by a union representative or colleague at these review meetings.

**I believe there have been the following changes in my condition/ impairment (and/ or changes to my situation which impact on my condition/ impairment) and require the following changes to be made to the current agreed adjustments:**

**Review date:**

**Employee signature:**

**Line manager signature:**

# Equality analysis

<b>Title of policy, project or proposal:</b>
Supporting Staff with Mental or Physical Disabilities (Reasonable Adjustments) Policy

<b>Name of lead manager:</b>	Nick Birtley, Head of Equality and Inclusion
<b>Directorate:</b>	Quality

<p><b>Q1 What are the intended outcomes of this policy, project or proposal?</b></p> <p>This policy sets out the West Hampshire Clinical Commissioning Group (CCG) approach to supporting and managing staff with:</p> <ul style="list-style-type: none"> <li>• A physical disability</li> <li>• Sensory disability (for example a visual or hearing impairment)</li> <li>• A learning disability (dyslexia, dyscalculia, Attention Deficit/ Hyperactivity Disorder)</li> <li>• Autism spectrum disorder (Autism, Asperger’s syndrome)</li> <li>• Or a diagnosed long-term health condition, including a physical or mental health condition.</li> </ul> <p>In particular, the policy aims to help managers to:</p> <ul style="list-style-type: none"> <li>• Create a workplace and organisational culture that is welcoming, compassionate and respectful of people who have a mental illness, a disability or a long-term health condition</li> <li>• To meet their legal obligation to consider and make reasonable adjustments in the workplace under Section 20 of the Equality Act 2010</li> <li>• To avoid and remove discrimination against applicants and employees who have a disability.</li> </ul>
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<p><b>Q2 Who will be affected by this policy, project or proposal?</b></p> <p>This policy impacts:</p> <ul style="list-style-type: none"> <li>• People with an existing disability, mental health or other long-term health condition that apply for jobs at the CCG</li> <li>• Current employees of West Hampshire CCG who have a pre-existing disability or other long-term mental or physical health condition</li> <li>• Current employees of the CCG who develop a long-term mental or physical health condition or who become disabled</li> <li>• Line managers of the staff above who need to respond to needs.</li> </ul>
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<p><b>Evidence</b></p> <p><b>Q3 What evidence have you considered?</b></p> <p>To make sure that this policy complies with the law and reflects best practice a range of documents have been used:</p>
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- ACAS (2017) Disability discrimination: Key points for the workplace London: Advisory, Conciliation and Arbitration Service
- Department for Work & Pensions (2018) Guidance: Employing disabled people and people with health conditions GOV.UK website
- Equality and Human Rights Commission (2011) Equality Act 2010 Statutory Code of Practice: Employment Statutory Code of Practice Norwich: The Stationary Office
- The NHS Staff Council Equality and Diversity Group (2014) Guidance relating to disability for the NHS London: NHS Employers

We have also used anecdotal evidence and learning from the experiences of CCG staff with disabilities.

## Age

The CCG Workforce Diversity Profile 2018/19 gives an indication of the age profile of employees (snap shot date 31 December 2018):

	2013	2014	2015	2016	2017	2018	Comparator
Total number of employees	190	197	204	229	275	322	
Age group							National CCG workforce
16-24	3.7%	2%	1.5%	1.7%	2.2%	4%	2%
25-44	28.9%	35.5%	35.3%	37.6%	40%	42%	43%
45-64	65.8%	60.4%	60.8%	59.4%	56.4%	53%	53%
65+	1.6%	2%	2.5%	1.3%	1.5%	1%	2%

- The age profile of the CCG workforce has been shifting year-on-year with a gradual increase in 25-44 year olds, and a decrease in staff aged 45-64 (although this older age group still make-up the majority the workforce)
- Employees aged less than 24 years and over 65 years, make-up a small proportion of the workforce at just 4% and 1% respectively.

The prevalence of disability rises with age. Around 6% of children are disabled, compared to 16% of working age adults and 45% of adults over State Pension age (Family Resources Survey 2010/11).

Staff of any age can request reasonable adjustments under this policy so it is expected that the policy will have a positive impact for all age groups. Given the evidence that in the general population levels of disability increase as people get older, older employees may be more likely to request adjustments under the policy.

## Disability (physical and mental)

The CCG Workforce Diversity Profile 2018/19 gives an indication of disability amongst employees (snap shot date 31 December 2018):

	2013	2014	2015	2016	2017	2018	Comparator
Total number of employees	190	197	204	229	275	322	
Disability							National CCG workforce
No disability	-	31%	72.5%	76.4%	77.1%	78%	71%
Yes I have a disability	-	1%	2%	4%	3%	4%	3%
Prefer not to say	-	19.8%	21.1%	16.2%	10.9%	8%	0%
Undefined	-	48.2%	4.4%	3.9%	8.7%	10%	26%*

- The proportion of declared disability in the CCG workforce remains low and does not reflect levels of disability in the local population (7%).

For comparison, according to the [Family Resources Survey 2016/17](#), 19% of working age adults are disabled.

The [Labour Force Survey January to March 2018](#) identifies that although more than 3.7 million disabled people are in work, disabled people are more than twice as likely to be unemployed as non-disabled people.

The employment rate gap between disabled and non-disabled people is particularly wide for those aged 50–64. Employment rates for disabled people also vary considerably according to the type of impairment; in March 2018, less than a quarter of people with learning difficulties, a speech impediment or mental health conditions were in employment

Powell A (2018) 'People with disabilities in employment'. House of Commons Briefing Paper no. 7540).

Introducing this policy supports the CCGs work on equality and inclusion, and our commitments as a Disability Confident employer. It will hopefully encourage more people with a disability to apply for job at the CCG.

The Workforce Disability Equality Standard (WDES) (baseline 2019) highlights that:

**WDES Metric 8:** *Percentage of Disabled staff saying that their employer has made adequate adjustment(s) to enable them to carry out their work.*

	2019
	Disabled
<b>Percentage of Disabled staff saying that their employer has made adequate adjustment(s) to enable them to carry out their work.</b>	81.3%

Despite this positive result from the NHS Staff Survey/ WDES baseline, we have also gathered anecdotal evidence from staff with disabilities that they have experienced delays in supply of equipment that would make the workplace more accessible.

The CCG is introducing this policy to improve organisational processes of identifying a need for reasonable adjustments and speed up the provision of specialist equipment. The policy aims to have a positive equality impact for job candidates and employees who develop or have a pre-existing disability.

**Dementia**

As far as we know, no employees have a diagnosis of dementia.

**Gender reassignment (including transgender)**

The policy aims to have a positive impact for all staff regardless of gender (including transgender).

**Marriage and civil partnership**

The policy aims to have a positive impact in relation to this protected characteristic.

**Pregnancy and maternity**

The policy aims to have a positive impact for staff with disabilities who are pregnant.

**Race**

The CCG Workforce Diversity Profile 2018/19 gives an indication of the ethnic make-up of employees:

	2013	2014	2015	2016	2017	2018	Comparator
Total number of employees	190	197	204	229	275	322	
Ethnic background							Local population
White British	-	69.6%	80.9%	86.5%	84.7%	84%	93%
Any other White background	-	2%	3.5%	3.1%	3.3%	3%	3.1%
Mixed ethnicity	-	0.5%	1%	1%	1%	2%	1.2%
Black, Asian and Minority Ethnic	-	2.5%	3%	3%	4%	5%	4.1%
Other specified	-	0%	0.5%	0.4%	1.8%	0%	0.2%
Undefined/ not stated	-	25.3%	11.3%	6.1%	4.7%	6%	0%

- The proportion of staff from ‘White other’ ethnic backgrounds reflects the ethnic diversity of local population. This includes staff from European backgrounds
- For the first time since 2013, this year the proportion of employees from ‘Black, Asian and

Minority Ethnic' and 'Mixed' ethnic backgrounds is higher than the ethnic diversity of the local population. Previously these groups were under-represented in the workforce.

Nationally data suggests that levels of self-reported limiting illness and/or disability are markedly higher among people of Bangladeshi and Pakistani background compared to all other ethnic groups, from age 45 onwards. Staff from these ethnic groups may be more likely to request reasonable adjustments under the policy.

The policy aims to have a positive impact in relation to the protected characteristic of race.

### Religion or belief

The CCG Workforce Diversity Profile 2018/19 shows there remain significant data gaps for the employee protected characteristic of religion or belief. This means we do not know the exact faith profile of the workforce.

	2013	2014	2015	2016	2017	2018
Religion or belief						
Atheism	-	5.1%	6.4%	7%	11.6%	14%
Christianity	-	15.2%	33.8%	37.6%	40.7%	41%
Other	-	0%	10.3%	12.6%	11.6%	13%
Prefer not to say	-	33.5%	48.5%	40.2%	30.9%	25%
Undefined	-	45.2%	1%	3%	5%	7%

The policy aims to have a positive impact in relation to the protected characteristic of religion or belief.

### Sex (gender)

The CCG Workforce Diversity Profile shows that on 31 December 2018:

- 79.5% of employees were female
- 20.5% were male.

The gender balance of the workforce has remained similar since 2013, at around 80% female and 20% male.

Nationally, there is some evidence that in employment women with disabilities fare worse than both disabled men and their non-disabled female peers.

The policy aims to have a positive impact irrespective of employee gender, but given the evidence we have, female staff with disabilities should particularly benefit.

### Sexual orientation

Policy aims to have a positive impact regardless of sexual orientation.

## **Carers**

The CCG does not keep records about whether employees are unpaid carers for children, grandchildren, partners, parents, other relatives or friends who have a disability or long term health conditions.

The policy recognises that employees who are carers of children or adults with a disability may need to accompany them to medical appointments related to their disability. The CCG has recognised this by giving access to Disability Leave for this group.

## **Serving Armed Forces personnel, their families and veterans**

The CCG does not have data about whether staff are reservists, veterans or living with serving Armed Forces personnel. No negative equality impact is anticipated.

## **Meeting psychological needs**

Not applicable as this is a workforce related policy.

## **Other identified groups**

It is not currently possible to identify other groups within the workforce.

## **Involvement and consultation**

*For each engagement activity, briefly outline who was involved, how and when they were engaged, and the key outputs.*

### **Q4 How have you involved stakeholders with an interest in protected characteristics in gathering evidence or testing the evidence available?**

- Anecdotal evidence was gathered from employees with a disability about the process currently used and how well it works. This is generally very positive, however identified that there is a need for a clearer and faster process for identifying and implementing reasonable adjustments
- Contact was made with members of the Thames Valley and Wessex Leadership Academy Inclusion Network to request example policies and learning from other NHS and partner organisations regionally.

### **Q5 How have you involved stakeholders in testing the policy or programme proposals?**

The policy has been reviewed by the CCG Executive Team and the Policy Sub-Group (which includes representatives from the CCG Staff Forum).

### **Q6 For each involvement activity, please state who was involved, how and when they were engaged, and the key outputs:**

Two focus groups were held in May 2019 with staff with disabilities/ health conditions. Some employees preferred to meet one-to-one and this was facilitated. 8 staff contributed in total. Views of staff were used to shape the policy content.

Feedback received from the Exec Team in November 2019.

## Equality statement

National and local evidence suggests that older staff/ older working age people within the workforce/ prospective job applicants are more likely to be living with a disability.

National evidence highlights that a number of protected characteristic groups fare less well in the workplace:

- Disabled people are more than twice as likely to be unemployed as non-disabled people
- Employment rates for disabled people vary considerably according to the type of impairment – less than a quarter of people with learning difficulties, a speech impediment or mental health conditions were in employment in 2018
- Nationally levels of self-reported limiting illness and/ or disability are markedly higher among people of Bangladeshi and Pakistani background compared to all other ethnic groups, from age 45 onwards
- In employment women with disabilities fare worse than both disabled men and their non-disabled peers.

The 2018 NHS staff survey results for the CCG indicate that 81.3% of staff with a disability said that the CCG has made adequate adjustments to enable them to carry out their work. This is positive, although there is further improvement needed. Anecdotal information gathered from CCG staff with long-term health conditions and/ or disabilities identified a need to put in place a clearer and speedier process for identifying and implementing reasonable adjustments for staff.

All this evidence supports our rationale for developing and implementing a policy to specifically support staff with disabilities in the workplace and implement a clear process that can be communicated to staff and line managers. We have also shaped the policy to reflect national guidance and best practice in this area.

The policy is intended to have a positive equality impact for all protected characteristics. As a new policy covering a sensitive area for staff, we will carefully monitor policy implementation. This will include seeking feedback from staff who make requests for reasonable adjustments/ line managers who support them to ensure the policy works effectively.

### Positive impacts

Intended positive equality impacts are:

- Policy introduces a clear, efficient, supportive and inclusive process for responding to the needs of staff with long-term mental or physical health conditions and/ or disabilities
- In line with the evidence, job applicants and staff with the following protected characteristics/ combined characteristics will particularly benefit:
  - Those with disabilities
  - Women
  - Older people
  - People from BAME backgrounds
- Having the policy in place supports our commitments as a Disability Confident employer and will hopefully attract more applications from people with a disability.

### Negative impacts

There is a risk that protected groups are negatively impacted if the policy is not followed or implementation identifies an unanticipated equality issue. To manage risks we will monitor implementation carefully and seek feedback from staff and managers.

**Health inequalities**

The policy is intended to reduce health inequalities by supporting staff to stay in employment and/ or attracting people with disabilities into employment.

## Action planning for improvement, and to address health equalities and discrimination

Action	Person responsible	By date	Progress/ review (Add new actions if required)
1. Develop policy that reflects best practice, advice from other organisations and staff feedback	Head of Equality and Inclusion	31 October 2019	Completed.
2. As this is a new policy, monitor implementation closely so that it can be modified if necessary	Head of Equality and Inclusion	January to December 2020	
3. Undertake an audit of job descriptions, looking at a sample of new posts in the next 3 months to ensure job descriptions describe what is required for the post to ensure the applicant, manager and Occupational Health team can ascertain any reasonable adjustments that may be required by the post holder	Human Resources and Head of Equality, Diversity and Inclusion	30 April 2020	
4. CCG to achieve level 2 of the Disability Confident Scheme	Head of Organisational Development and Head of Equality, Diversity and Inclusion	30 June 2020	

## For your records

<b>Name(s) of person who carried out this assessment:</b>	Nick Birtley, Head of Equality and Inclusion
<b>Date assessment completed:</b>	9 January 2020
<b>Date to review actions:</b>	12 months linked to policy review
<b>Name of responsible Director:</b>	Ellen McNicholas, Director of Quality and Board Nurse
<b>Date assessment was approved:</b>	15 January 2020