



Disability Policy

NW
NORWOOD UK

1 Introductory Statement

1.1 The company is committed to a policy of equal opportunities for disabled staff and aims to create an environment which enables them to participate fully in the life of the company. This policy also extends to members of the public using the company's premises and services. The objective of the policy is to ensure that members of the company community with disabilities (mental or physical) have access to both facilities that is, wherever reasonably possible, comparable to that of their non-disabled peers. This policy recognises that disabled staff are an integral part of the company community. It takes as its starting point the premise that accessible and appropriate provision is not 'additional' but a core element of the overall service which the company makes available. The broad policy aims are based on the Quality Assurance Agency (QAA) Code of Practice – Staff with Disabilities and the Equality Act 2010.

1.2 To advance disability equality, the company will :

- a) Ensure potential and current staff and visitors with disabilities are not discriminated against
- b) Ensure that reasonable adjustments are put in place for staff and visitors with disabilities
- c) Support the retention, development and progression of disabled staff
- d) Promote a positive working environment for disabled staff
- e) Provide training and support for managers to ensure they are equipped to provide the necessary support and can respond appropriately to the needs of staff with disabilities.

2 Responsibilities

2.1 Human Resources are responsible for ensuring compliance by their company with equality law. All staff of the company are expected to be aware of this policy and the legal framework and to treat disabled people, whether, staff or members of the public, in accordance with these provisions. In particular, Line Managers and others in management positions will be responsible for ensuring that the policy and legal framework are communicated effectively through staff development programmes and are being implemented in their area. Disability training and support will be made available for managers and disability equality guidance and information on good practice is available for managers via Human Resources.

3 Definition of Disability

- 3.1** A person has a disability if he or she has a physical or mental impairment that has a substantial and long term adverse effect on his or her ability to carry out normal day-to-day activities (Equality Act 2010). Disability covers a wide range of physical and mental impairments, including physical and mobility difficulties, hearing impairments, visual impairments, specific learning difficulties including dyslexia, medical conditions and mental health problems.

4 Policies, Procedures and Activities

- 4.1** The company will ensure that in all policies, procedures, functions and activities, including strategic planning and resource allocation, consideration is given to the means of enabling disabled staff full participation in all aspects of the company.

5 Disclosure and Confidentiality

- 5.1** The company is mindful of its responsibilities under the Data Protection Act 1998 and will ensure the needs of disabled staff are not compromised by the competing requirements of this legislation with the responsibilities it places on the company in respect of the Equality Act 2010.
- 5.2** The company will develop an environment within which individuals feel able to disclose their disability. Encouragement and opportunity will be given to staff to disclose any disability that may have a substantial and long-term adverse effect on his or her ability to carry out normal day-to-day activities so that a discussion can take place about disability-related reasonable adjustments or other support that may be required. Individuals can choose to bring someone to accompany them at meetings to provide extra support if required.
- 5.3** The company will also encourage staff to disclose any condition which in the short term has substantial impact on their day to day activities to ensure that appropriate support can be provided.
- 5.4** Disclosing a disability is a personal matter and it is up to individuals whether they decide to tell the company and if so when to do this. However, if opportunities have been given to disclose a disability and an individual decides not to, the company cannot make adjustments. If you have concerns about disclosure and would like to discuss these confidentially contact the HR Department.
- 5.5** Disclosed information will be treated in the strictest confidence. The company will require explicit, informed and written authority for the giving of consent in respect of the processing, both internally within the company and externally by third parties, of any sensitive personal information which is disclosed.

5.6 Any member of staff who is unsure as to whether their particular medical condition is covered under this policy can request a meeting with an HR department.

5.7 If a disabled staff member is to work frequently on his/her own in hazardous situations or has special requirements in relation to fire or general evacuation the company would encourage them to bring this to the attention of their line manager so that appropriate plans and arrangements can be made.

6 Monitoring and Evaluation

6.1 The company will operate systems to monitor and review the effectiveness of provision for staff with disabilities, evaluate progress and identify opportunities for enhancement. This includes monitoring representation of disabled staff in different company activities including sport, performances and recreation.

6.2 All aspects of this policy, particularly the recruitment process, will be subject to ongoing review and amendment, as appropriate in order to improve its effectiveness. This will include consideration of measures which will assist in rectifying any under-representation of disabled employees in the company.

7 Participation and Accessibility

7.1 Criteria and procedures used for selecting staff will relate to the requirements of the job, including any professional requirements, and will not disadvantage or debar applicants with disabilities.

7.2 The company will ensure that staff with disabilities will have access to the full range of support services, appropriate to their needs, which are available to their non-disabled peers. Where existing services cannot be made accessible, the company will make reasonable alternative services and arrangements available.

7.3 The company will make information available about access to buildings.

9 Complaints

9.1 The company has in place policies and procedures to deal with complaints arising directly or indirectly from a staff disability. In the first instance issues should be resolved at line manager level. Formal complaints should follow the same guidelines that apply for other complaints within the company. This policy should be read in conjunction with the other policies, regulations and statutes of the company Staff .

10 Promoting Disability Equality

10.1 The Equality Act 2010 makes it unlawful to discriminate, in the field of employment, against a disabled person for a reason that relates to a person's disability. This applies not only to recruitment but to all areas of employment, including the terms of employment, opportunities for promotion, transfer or training, dismissals or redundancies.

10.2 To this end the company will:

- a) Provide equal opportunities for individuals who are disabled in relation to recruitment, training, promotion, transfer and terms and conditions of employment;
- b) Ensure that disabled staff are given reasonable support, equipment and facilities necessary for them to carry out their duties successfully;
- c) Make reasonable adjustments to working arrangements and/or the physical working environment, where they disadvantage a disabled member of staff;
- d) Offer all disabled staff an annual review of their current employment needs and future training requirements specific to their disability, to ensure their skills and abilities can be fully utilized at work and to discuss any reasonable adjustments which may be identified.
- e) Ensure that it follows guidance from external advisors such as the Equality and Human Rights Commission with regards to defining what is 'reasonable'.

11 Recruitment and Selection

11.1 All company vacancies will be open to suitably qualified disabled people.

11.2 Employment criteria shown in the Job Purpose and vacancy advertisement must be significant, objective and appropriate to that particular post, e.g. it would be inappropriate to specify a high level of mobility for a sedentary post. Job advertisements must be written in an appropriate non-discriminatory manner which encourages applications from disabled persons.

11.3 All applicants who accept the offer of an interview will be asked in advance if they require any special arrangements to be made for them at the interview.

12 Training and Development

12.1 All disabled staff will have equal access to training and development opportunities including, within reason, any which are identified in relation to their specific needs.

12.2 Staff who are involved in recruitment and the management of disabled staff will also be provided with an appropriate level of training to ensure they are equipped to assist and support disabled staff or potential staff members.

13 Retention

13.1 The company will make every reasonable effort to enable a member of staff who becomes disabled or whose level of disability increases, to continue working in the post in which they were originally employed.

13.2 Where a disabled staff member is unable to continue with their existing duties, every effort will be made to find suitable alternative employment within the company and appropriate training will be provided if required.

13.3 In situations where suitable alternative work cannot be identified, or where an employee is unable to continue in the company's employment for reasons relating to their disability, the company will provide reasonable assistance to help that individual in their departure. This may include but is not limited to investigation into the possibility of retirement on grounds of ill health; and identification of appropriate external sources of advice and assistance.

14 Consultation

14.1 The role and working conditions of disabled staff will be reviewed periodically, according to individual needs, and especially in light of any changes in their disability. Each disabled member of staff will have an opportunity at least annually to discuss any current employment issues they may have and any future training and development needs.

14.2 This review process will be initiated by HR who will be responsible for contacting the member of staff to see if they wish to discuss any issues but the individual can decide who they wish to conduct the review. They may choose to discuss their needs with their manager perhaps as part of the annual staff appraisal meeting, with their HR representative.

15 Complaints

15.1 An employee who feels they have been unfairly treated or discriminated against on the grounds of disability may raise a complaint through the company's grievance procedures, copies of which are available on the website or from the HR department.

15.2 Job applicants who consider that they have been discriminated against should be advised to write to the Director of Human Resources, giving details as to why they believe they have been discriminated against.

16 More information

16.1 For further advice and signposting to a range of information and guidance please visit www.norwooduk.com

17 Related Policies

- Equality and Diversity Policy
- Harassment and Bullying Policy
- Grievance Procedures
- Guidance notes on Emergency Evacuation for People with Special Needs
- Disclosure and Confidentiality

Signed for and on behalf of the company

A handwritten signature in blue ink, appearing to read 'Jo Shuttlewood'.

Jo Shuttlewood – HR Director