

R2 Potential CIC

Disability policy

R2 Potential (R2P) wants, wherever possible, to take reasonable steps in the way that we work with people with a disability to ensure they are not disadvantaged in comparison to people who are not disabled.

There are legal requirements to make reasonable adjustments, which are often complex and different depending on the nature of a person's individual circumstances.

This policy does not seek to explain how we will approach every situation, it is intended as a general statement of our policy to:

- Confirm our commitment to providing a fair and flexible working environment and service that does not discriminate and can be accessed and used by all of our customers;
- Set out some of the basic principles of our legal duty to provide reasonable adjustments for people with a disability; and
- Set out some of the factors that we will take into account in dealing with requests for reasonable adjustments.

Many of the arrangements that we offer for people with a disability may also be made available for those who don't have disabilities. For example, a person may find it easier to read reference notes in a larger than usual font, or may be going through a stressful situation, such as a bereavement, and may need more time to respond to us.

This policy applies to all R2P's customers and stakeholders, including clients, staff at all levels, people working with us on a particular project or piece of work, etc.

This policy is reviewed annually and it is approved by the Directors.

1) Reasonable adjustments

- a) What is a reasonable adjustment? A reasonable adjustment involves making a change to the way that we usually do things to ensure that we are fair to people with a disability and they can access our services as easily as a non-disabled person. This can mean a physical change to premises, or a change to work practices to avoid or correct a disadvantage to a person with a disability. We may depart from our usual practice if we find it places people with a disability at a substantial disadvantage, for instance, by providing information in an alternative format or allowing more time than we would usually for someone to provide information that we need. R2P will not make assumptions about whether a person with a disability requires any adjustments or about what those adjustments should be. We will discuss any required adjustments with the person concerned and seek to reach agreement on what may be reasonable in the circumstances.

2) Our legal duties in relation to people with a disability: The Equality Act (2010) requires R2P to provide reasonable adjustments for people with a disability, defined by the Act as those who have a physical or mental impairment which has a substantial and long-term adverse effect on that person's ability to carry out normal day-to-day activities. There is no need for a person to have a medically diagnosed cause for their impairment; what matters is the effect of the impairment, not the cause. This will, in some circumstances, mean that people with a disability receive more favourable treatment than non-disabled people, which is lawful in the context of disability. Substantial disadvantage is defined in the Equality Act (2010) s212(1) as “more than minor or trivial”

3) Our duty to make adjustments arises in three circumstances:

- a) R2P has a duty to make reasonable adjustments if the way that we carry out our functions places a disabled person at a “substantial disadvantage” compared to someone who is not disabled. The duty also requires R2P to consider what can be done to overcome any such disadvantage, and whether an adjustment can be made which is reasonable in all the circumstances.
- b) Where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- c) Where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled. R2P will use best efforts to agree in advance with the individual in question the reasonable adjustments that we are able to make and provide reasons when it may not be possible.

4) The disability equality duty

The duty is ‘anticipatory’ which means that we cannot wait until a disabled person wants to use our service. R2P will think, in advance, on an ongoing basis, about what people with a disability with a range of impairments might reasonably need eg. people who have a visual impairment, a hearing impairment, mobility impairment or a mental health / learning disability. One of the ways that R2P is working towards meeting its disability equality duty is by reviewing our policies and practices to identify possible barriers for people with a disability so that we can minimise those barriers and anticipate the reasonable adjustments that we may need to make.

5) Requesting reasonable adjustments

R2P will let people know that we can provide reasonable adjustments in the following ways:

- a) Asking people directly from the first communication that we have with them and throughout the customer journey if they have a disability and might need any adjustments; this includes verbal and written communication.
- b) Including a note on our published documents, where relevant, indicating that we can provide the document in an alternative format on request.
- c) Publishing this policy on our website.

6. The types of reasonable adjustments we can offer

While we will consider each request for reasonable adjustments individually, there are some common adjustments which we will offer as a matter of course and some other adjustments that we can make particular arrangements to provide. The adjustments will always be agreed with the person concerned to avoid making incorrect assumptions about their needs. When considering what reasonable adjustments we may make, we will take into account reasonable variations to our processes, policies and procedures. Some examples of the simple reasonable adjustments that staff can make may include:

- a) Providing documents or correspondence in a larger font size.
- b) Using numbered paragraphs in our correspondence and ensuring page numbers are included.
- c) Providing documents on coloured paper or with a specific colour contrast, which can often help people with conditions such as dyslexia.
- d) Allowing a person who has a learning disability or mental health problems more time than would usually be allowed to provide further information, except where there is a statutory or other imposed deadline which we have no power to change.
- e) Using e-mail or the telephone in preference to hard copy letters where appropriate, which may assist those with a visual impairment.
- f) Speaking clearly to the people with whom we deal with and offering additional time to cover the issues they need to discuss. This will help everyone understand our processes and procedures.
- g) Using plain English appropriate to the person we are dealing with and avoiding jargon wherever possible or explaining its meaning if it is unavoidable.
- h) Communicating by e-mail (or, if necessary, post) for those with a speech impairment. A small number of requests may require more detailed consideration and our approach to these requests is discussed in the section below.

7) Our response to requests for reasonable adjustments

In the majority of cases, we will be able to agree and deliver reasonable adjustments with a minimum of delay. In some cases, we may need to consider in more detail how best to overcome the difficulty a disabled person may be experiencing. For example, where the adjustment requested may be difficult to provide or where it may interfere with our legislative obligations.

8) How we decide what is 'reasonable'

The Equality Act does not define what is 'reasonable', but it is expected that, until regulations are introduced for this purpose, the statutory guidance which had been available under the Disability Discrimination Act will continue to apply. We will therefore rely on this to help us in

the more difficult cases. The consideration of whether an adjustment is 'reasonable' is judged against the following:

- The effectiveness of the adjustment(s) in preventing the disadvantage.
- The extent to which it is practical for RDP International to make the adjustment(s).
- The cost and availability of resources, including external assistance and finance.
- The extent to which making the adjustment(s) would disrupt R2P's activities.

- a) Will the adjustment help in overcoming the difficulty that the person with a disability may have?

The adjustment should be designed fully to address the disadvantage it is meant to overcome. For example, providing an audio version of documents may not properly overcome the barriers faced by the person with a disability if there are other requirements that need to be overcome, for example, if the customer also has a hearing impairment.

- b) How practical is it to provide the adjustment?

For example, it may not be possible for R2P to provide additional time to customers where there are deadlines for the organisation to meet.

- c) What are the resource implications of making the adjustment?

For an adjustment to be reasonable, it should be effective. However, it is important to remember that an adjustment, which is deemed effective, may not be considered reasonable.

For example, around issues of resourcing. Resourcing is not just about the cost, but may involve other factors, such as recruiting additional staff with specific skills. In terms of the use of our resources for making adjustments, the 'reasonableness' of an adjustment will be evaluated against the resources available to R2P as a whole.

However, even if an adjustment has a significant cost associated with it, careful consideration to any long-term benefit that it may provide to R2P and customers will be given. In practice, many reasonable adjustments involve little or no cost or additional resourcing requirements and are relatively easy to implement.

9) Monitoring

R2P will obtain permission to record and monitor the reasonable adjustments that have been requested and made. This will allow us to review the services we provide and help us to identify whether there are any wider steps that we can take to improve our services.