

Employee Matters Committee

1 May 2025

Reasonable Adjustments Policy

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Summary

This report seeks to introduce a Reasonable Adjustments Policy to ensure that all employees with disabilities are provided with appropriate adjustments to support their needs and enable them to perform their roles effectively.

Introducing a Reasonable Adjustments Policy will support compliance with legal requirements under the Equality Act 2010 and promote an inclusive and supportive working environment. This policy will help the council to attract and retain talented individuals with disabilities and support requirements and work towards creating an equitable work environment for all.

1. Recommendations

- 1.1 The Committee is asked to approve the introduction of a Reasonable Adjustments Policy set out as Appendix A to the report and approve the implementation of the policy across all areas of the organisation.
- 1.2 The Committee is asked to note the requirement for adequate training provision and awareness communications to allow managers and employees to have an informed insight into how the council will support those who require adjustments.

2. Budget and policy framework

- 2.1 The decision aligns with the council's policy framework and supports the One Medway Council Plan by providing employees with a work environment in which they can thrive. The adoption of the policy emphasises a commitment to equity, inclusivity and support for all employees.
- 2.2 The implementation of the policy may have an impact on budgets for services as there is no centralised budget for reasonable adjustments. An increase in awareness of what is available to support employees may lead to an increase of requests, however it is recognised that for some support accommodations, such as flexible working, there would be no cost.

3. Background

- 3.1 Disability is one of the nine protected characteristics under the Equality Act 2010. The Act says that a person has a disability if they have a “physical or mental impairment”, and the impairment has a “substantial and long-term adverse effect on [their] ability to carry out normal day-to-day activities.”
- 3.2 Introducing a Reasonable Adjustments Policy will support compliance with legal requirements under the Equality Act 2010 and to promote an inclusive and supportive working environment.
- 3.3 This policy will help the council to attract and retain talented individuals with disabilities and support requirements and work towards creating an equitable work environment for all.
- 3.4 The council has recognised the need to support employees with disabilities by providing reasonable adjustments. This policy aims to increase awareness of the process and ensure consistency across all departments.
- 3.5 The background leading to this report and development of the policy includes feedback from employees, learning from casework, legal requirements, and best practices from other councils as well as ACAS.

4. Options

- 4.1 Approve the Policy: This option ensures compliance with legal requirements and promotes inclusivity and equity across the council. The advantages of this could be to improve health and wellbeing, improvements in employee satisfaction, a reduction in absence rates to support individuals back to work and whilst they are working and retention.
- 4.2 This is a new policy and the risk of not adopting the policy would be a risk of inconsistency across the council, legal non-compliance, a negative impact on employee morale/satisfaction, a negative impact on wellbeing – both physical and mental – absence rates, and retention.

5. Advice and analysis

- 5.1 The recommended option is to approve the policy. This decision supports the council's commitment to inclusivity and legal compliance. The analysis includes considerations of sustainability and diversity, ensuring that the policy promotes a supportive environment for all employees
- 5.2 Appendix B to the report is a Diversity Impact Assessment (DIA) which has been undertaken.
- 5.3 To summarise there is no detrimental impact identified due to the adoption of this policy. It would likely advance equality and foster good relations for Disability, Age and Pregnancy/Maternity.

6 Risk management

Risk	Description	Action to avoid or mitigate risk	Risk rating
Non-compliance with legal requirements	Inconsistencies, delays or the non-adoption of adjustments where required would put the council at risk of litigation.	Implement the policy. Improve awareness through communication channels and training.	B II
Insufficient resources for adjustments	There is no centralised budget for making accommodations. Budget holders should take account of the cost of this out of service budgets and ensure that financial decisions do not impact on the provision of adjustments	Allocate budget and monitor costs.	C III
Resistance to change/lack of understanding of requirements and support measures available	If the policy is adopted but not followed and acted upon or there is a lack of 'buy in' this would cause inconsistencies across the council/	Conduct awareness programs and signpost to the policy in relevant areas, e.g. Managing Absence Policy, dedicated Medspace page and alongside any health awareness/campaigns which the council supports.	C III

Likelihood	Impact:
A Very likely B Likely C Unlikely D Rare	I Catastrophic II Major III Moderate IV Minor

7. Consultation

- 7.1. The policy was shared with the Trade Unions and was discussed at Corporate Consultative Committee on 26 March 2025.

- 7.2. Staff forums have been engaged, and feedback has been received from the Disability Workers and Carers Network.
- 7.3. Feedback has been received from the Medway Makers staff group and was presented to them for comments at a meeting on the 8 April 2025.
- 7.4. All feedback has been considered and implemented where appropriate.
- 8. Climate change implications
 - 8.1 There are no climate implications directly arising from this policy.
- 9. Financial implications
 - 9.1. There is no centralised budget for making accommodations. Costs would need to be funded from existing service budgets wherever possible.
- 10. Legal implications
 - 10.1. All reports The Equality Act 2010 includes a requirement for organisations to provide reasonable adjustments to employees who are considered to have a disability as defined within the Act to support them at work.
 - 10.2. The revised policy and supporting guidance and planned training will provide more detailed information on reasonable adjustments with the aim to make managers more confident when dealing with requests and identifying support. This will help employees to be clear on their rights and how the council will aim to support them return to work and support them whilst they are at work.

Lead officer contact

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Appendices

Appendix A: Reasonable Adjustments Policy

Appendix B: Disability Impact Assessment