

# Staff Disability Policy

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## Committee Approval

Committee	Committee Action	Date
EDIC	Recommended approval	31 August 2023
SMT	Approved	01 November 2023
	<b>Date in force</b>	<b>09 November 2023</b>

The Staff Disability Policy will be reviewed regularly by our Equality, Diversity and Inclusion Committee (EDIC) in line with our Policy Review Schedule. A review may also be triggered because of changes in the legislative requirements. Any amendments will be subject to approval by the Senior Management Team.

# 1. Introduction and Overview

1. The Institute is committed to developing, maintaining and supporting a culture of equality and diversity in employment in which members of staff and applicants are treated equitably regardless of any disability as defined in the Equality Act 2010. This policy outlines the Institute's commitment to creating a culture and environment in which all members of staff and applicants are treated fairly and not disadvantaged because of a disability.
2. The Institute has a number of relevant memberships in place. For example, it is a Disability Confident Employer<sup>1</sup> and also a Mindful Employer<sup>2</sup> signatory.
3. The Equality Act 2010 replaced the Disability Discrimination Act (DDA) 1995 (as amended) and sections of the Special Educational Needs and Disability Act (SENDA) 2001, providing extended legal protection for people with a disability in various areas, including employment. It states 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 his or her ability to carry out normal day-to-day activities."

Equality Act 2010, section 6.

"Substantial" is defined by the Act as 'more than minor or trivial'.

An impairment is considered to have a long-term effect if:

- it has lasted for at least 12 months;
  - it is likely to last for at least 12 months, or
  - it is likely to last for the rest of the life of the person.
4. People who have had a disability in the past are also protected against discrimination, harassment and victimisation. This may be particularly relevant for people with fluctuating and/or recurring impairments/health conditions.

A number of conditions may be considered to be a disability as outlined below.

- An individual is treated as a person with a disability without having to show their condition has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities in the following situations:
  - where the individual has cancer, HIV infection or multiple sclerosis they are considered to have a disability from the point of diagnosis;
  - where a consultant ophthalmologist has certified someone as blind, severely sight-impaired or partially sighted, the Act regards them as having a disability;
  - where an individual has a "progressive condition", initially the effect on their ability to carry out normal day-to-day activities may not be sufficiently serious to amount to a substantial adverse effect. However, they are treated as having a disability if their condition is likely to have a substantial adverse effect on their day-to-day activities in the future. This means that an individual with a progressive condition may qualify

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<sup>1</sup> Disability Confident Employer: Disability Confident is a government initiative designed to encourage employers to recruit and retain disabled people and those with health conditions.

<sup>2</sup> Mindful Employer: Mindful Employer is a national initiative supporting employers to take a positive approach towards mental health at work. By signing the Mindful Employer charter employers can make a public declaration of their ambition to support the mental wellbeing of their staff.

for protection as a person with a disability before the adverse effects of their condition become serious. Progressive conditions increase in severity over time and, for example include dementia, muscular dystrophy and motor neurone disease.

- Impairments can include: sensory impairments, such as those affecting sight or hearing; conditions which can range from myalgic encephalomyelitis (ME), diabetes and arthritis to depression, schizophrenia, phobias, personality disorders, autism, dyslexia, learning disabilities and injury to the brain; those affecting body organs such as asthma and heart disease; musculoskeletal conditions - injury, damage and disorders which affect bones, muscles, joints ligaments, tendons and nerves; and conditions/effects produced by injury to the body.
5. Full definitions of a disability are set out in Appendix 1 of the [Equality and Human Rights commission statutory code of practice](#)<sup>3</sup> and [HM Government document Equality Act 2010 Guidance](#).<sup>4</sup>
  6. Employers have a duty to make reasonable adjustments to their practices and premises to accommodate people with a disability, where any arrangements or physical features of premises cause a substantial disadvantage. Examples of reasonable adjustments may include:
    - giving or arranging training
    - providing more flexible working hours or arrangements
    - assigning the person to a different workplace
    - acquiring or modifying equipment
    - making adjustments to premises (where reasonably practicable)
    - adjustment to work or working practices (where reasonably practicable).
  7. Time off for treatment, specialist reviews and disability related sickness absence will be taken into consideration in the application of the Institute's [Attendance Management Procedures](#)<sup>5</sup>.

## 2. Policy scope

8. This policy applies to all Bloomsbury Institute applicants and employees.
9. The scope of “disability” includes both physical impairments and mental impairments.
10. This policy also covers employees who have in the past met the requirements of the definition (Equality Act 2010), even if they are no longer experiencing this disability. To discriminate against that person based on past disability would be in breach of the Equality Act 2010.

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<sup>3</sup> <https://www.equalityhumanrights.com/en/publication-download/employment-statutory-code-practice>

<sup>4</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/570382/Equality\\_Act\\_2010-disability\\_definition.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/570382/Equality_Act_2010-disability_definition.pdf)

<sup>5</sup> <https://lsbm.breathehr.com>

### 3. Bloomsbury Institute approach

#### 3.1 Definition

11. For the purpose of this policy, Bloomsbury Institute adopt the definition as set out in the [Equality and Human Rights commission statutory code of practice](#)<sup>6</sup> and [HM Government document Equality Act 2010 Guidance](#).<sup>7</sup>
12. Under the Equality Act 2010, the definition of disability is wide and covers many different visible and non-visible conditions – for example, depression, chronic fatigue, heart condition, hearing loss/Deafness, diabetes, and neurodiverse conditions such as dyslexia and autism. It is not possible in all cases to know whether someone meets the legal definition of disability, therefore our focus is on **removing any barriers**, where it is reasonable to do so, rather than determining if someone has a disability.

#### 3.2 Aims

13. The aims of this policy are to:
  - promote a positive and supportive working environment and a framework for collaborative dialogue with candidates, and between staff and their line managers in cases where one or more parties has a disability or has a long-term condition(s). Where appropriate, professional advice from the People, Talent and Culture Manager, Disability and Wellbeing Manager and specialist services, such as Occupational Health, will be sought to ensure individuals are supported effectively;
  - recruit and retain talent, skills and experience and ensure staff with a disability, as far as reasonably practicable, can fulfil their employment potential;
  - in so far as is reasonably practicable, provide equity in access to the full range of recruitment, career development, promotion, training and other employment opportunities for all staff;
  - ensure that there is no unfair discrimination on grounds of disability and that access to employment and promotion in the Institute is based on merit.

#### 3.3 Roles and responsibilities

14. The Board of Directors have overall responsibility for equality and diversity in the Institute and all members of staff are responsible for promoting equality, valuing diversity and contributing to an inclusive culture.
15. Our Equality, Diversity and Inclusion Committee and certain staff have responsibility for the formulation of policies, procedures and action programmes relating to equality and diversity for members of staff. These primarily include line managers with professional advice from the People, Talent and Culture Manager, the Disability and Wellbeing Manager and the Estates and Facilities team.
16. All staff should be aware of their shared responsibility in supporting colleagues with a disability and the Institute's statutory responsibilities under the Equality Act 2010 and to abide by our

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<sup>6</sup> <https://www.equalityhumanrights.com/en/publication-download/employment-statutory-code-practice>

<sup>7</sup>

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/570382/Equality\\_Act\\_2010-disability\\_definition.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/570382/Equality_Act_2010-disability_definition.pdf)

[Dignity and Respect Policy](#)<sup>8</sup>. All staff have a duty to act in accordance with this policy (and associated processes and procedures) and treat others with dignity and respect at all times.

17. The member of staff should:

- make their **line manager** aware of a disability, which is having an impact upon their work; in the first instance, the member of staff should normally advise their line manager rather than any other member of staff. If for any reason the member of staff does not feel able to have the initial conversation with their line manager, they should talk to the People, Talent and Culture Manager. Staff are encouraged to disclose a disability even if this is not currently affecting their work.
- work with their line manager and understand that in order for the impact of the disability to be properly considered and addressed, they should also work with the People, Talent and Culture Manager, Occupational Health (if so referred), the Disability and Wellbeing Manager (if so referred) and other relevant staff or agencies in finding the most constructive option.
- apply to Access to Work (see point 24 below) for financial assistance with the costs of equipment or additional support where this is required.

18. The line manager will:

- create opportunities for staff to declare a disability and encourage them to do so;
- handle the disclosed personal information sensitively and with discretion;
- advise the member of staff on the other staff member(s) with whom they would need to share the information (and to what extent) in order to be able to address the impact of the disability on their work;
- seek and receive agreement in writing from the member of staff of the agreed staff with whom the information will be shared and what information will be shared before taking any action;
- receive concerns from staff in the event they feel they are not being treated equitably and discuss with the People, Talent and Culture Manager;
- consult with the Head of Division (if the line manager does not also hold this role) regarding the matter and consider all reasonably practicable options to enable the member of staff to continue in their role, including making any reasonable adjustments;
- consult with the People, Talent and Culture Manager to decide what adjustments can reasonably be made in the specific context in which the member of staff is working. This should be continued on an ongoing basis so that adjustments continue to be effective;
- update the Head of Division accordingly if the line manager does not also hold this role;
- request the People, Talent and Culture Manager to make a referral to the Disability and Wellbeing Manager and/or an Occupational Health Provider as appropriate (having already sought and received agreement in writing from the member of staff to make a referral to other parties where this is not already in place).

19. The People, Talent and Culture Manager will:

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<sup>8</sup> <https://www.bil.ac.uk/qem/policies/>

- facilitate dialogue between the line manager and the member of staff with a disability, if required;
- advise the line manager about the legal obligations as an employer;
- advise the line manager about the specialist advice on offer at the Institute (the Disability and Wellbeing Manager) or that may be available by a referral to an Occupational Health Provider;
- advise the line manager about the process of agreeing changes to the member of staff's role as a reasonable adjustment;
- advise the member of staff and their line manager about any redeployment procedures, if appropriate.

20. Following a referral to an Occupational Health Provider, the People, Talent and Culture Manager will:

- undertake an assessment of the health of the individual and its impact upon their role and any impact of the role upon their health. This may involve seeking information from the medical advisers of the member of staff;
- discuss with the member of staff the content of the report to be forwarded to their line manager, including adjustments if appropriate. If the member of staff does not agree with the content of the report, they may add an appendix setting out why they disagree;
- inform members of staff about the Access to Work scheme and, through a request via the People, Talent and Culture Manager, obtain specialist advice from the Disability and Wellbeing Manager in those cases where support is likely to be required.

21. The Disability and Wellbeing Manager will:

- advise the recruiting manager of any reasonable adjustments that are required to be implemented as part of the selection process;
- provide specialist advice to members of staff and line managers about possible aids and adaptations, where required;
- monitor the needs of staff with more complex disabilities for whom equipment or assistance has been provided.

22. The Estates and Facilities Manager will:

- assist in risk assessments when required;
- advise the line manager and People, Talent and Culture Manager where health and safety concerns are identified, arising from the disability.

23. The Chief Operating Officer and Chief Financial Officer will:

- have responsibility for agreeing and overseeing the budgeting and implementation of any adaptations and/or adjustments to the Institute's physical and self-managed estate (or relating to any possible adaptations or accommodation within the Institute's rented estate) resulting from an assessment of the needs of a member of disabled staff or successful applicant who discloses a disability.

24. Access to Work:



[Access to Work's \(AtW\)](#)<sup>9</sup> own processes require the employee to make the application to AtW.

Employees need to follow the steps below to make a claim for Access to Work:

- contact Access to Work with advice from the People, Talent and Culture Manager;
- print the Access to Work eligibility letter and take it to your employer or to a job interview;
- when an adviser contacts you and your employer, tell them about the help and support you need.

### **3.4 Reasonable Adjustments**

25. The Institute is required to make reasonable adjustments in order to remove barriers that staff may face because of their disability or long-term condition(s). An assessment of an individual's needs should be made by their manager and the individual and, where appropriate, Disability and Wellbeing Manager, and People, Talent and Culture Manager.
26. Staff should be involved in discussions about how their disability or long-term condition(s) impact upon them while at work and in considering any reasonable adjustments that might help. Reasonable adjustments are always made on a case-by-case basis and may be temporary in nature.
27. Whether an adjustment is considered reasonable depends on the individual circumstances in each case. The Institute will not make assumptions about whether a person requires any adjustments or about what those adjustments should be. The line manager and where appropriate, the People, Talent and Culture Manager will discuss the requirements with the individual and seek to reach mutual agreement, informed by medical advice where appropriate.

## **4. Policy implementation and associated processes and procedures**

### **4.1 Recruitment and selection**

28. Bloomsbury Institute encourages applications from candidates with a disability and will make reasonable adjustments where possible at all stages of the recruitment process, to enable a candidate with a disability to participate fully. If invited for interview, the applicant will be asked if they require any reasonable adjustments to attend.
29. If an applicant with a disability meets the essential criteria for the job (as set out within the Person Specification), they will be provided with the opportunity to demonstrate their abilities at an interview under our Guaranteed Interview Scheme. Our [Staff Recruitment and Development Policy](#)<sup>10</sup> provides detail on the consideration and process we follow in respect of the Guaranteed Interviews we offer to applicants with a disability.
30. Job Descriptions, Person Specifications and recruitment advertisements will be written on the basis of the essential and justifiable requirements of the position. Our Disability and Wellbeing Manager will review Job Descriptions and Person Specifications before finalisation in order to identify and address any issues that might prevent or deter a person with a disability from applying for the job. The People, Talent and Culture Manager's contact details are provided at the end of the Job Description should anyone need the documentation in a different format, to ask for support or to discuss any issues around reasonable adjustments.

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<sup>9</sup> <https://www.gov.uk/access-to-work>

<sup>10</sup> <https://www.bil.ac.uk/qem/policies/>

31. Shortlisting, appointment and rejection decisions will be transparent and justifiable and will be supported by written comments. To avoid any unintended or unconscious bias, shortlisting will be carried out by at least two people and one of these will normally be the line manager to which the successful applicant will report. In addition, members of all shortlisting and interview Panels will be required to re-read our [Unconscious Bias Guidance Notes](#).<sup>11</sup> When determining shortlisting (and selection) panels, due consideration will also be given to the promotion of equality and diversity.
32. We will provide appropriate training, development and support (as necessary) to those involved in the recruitment and selection process. As a minimum, all such staff are required to have completed our internal interview training, Equality and Diversity training, Unconscious Bias training, and to have read our Workforce Planning and Staff Recruitment Guidelines and our Unconscious Bias Guidance Notes.
33. Recruitment will be on merit and discussions about reasonable adjustments will be separate from consideration of the applicant's suitability for the post.

## **4.2 Retention**

34. Bloomsbury Institute undertakes, so far as is reasonably practicable, to ensure that members of staff who become disabled are able to remain in their role, before consideration of other alternatives.
35. If a member of staff not previously having a disability then does so during the course of their employment, professional advice may be sought from a range of sources and may include the provision of equipment and adaptations.
36. Consideration will be given to requests, which may be considered as a Reasonable Adjustment, from members of staff who become disabled for, for example, reduced or part-time hours/duties, whether on a temporary or permanent basis.
37. Where redeployment is considered both possible and appropriate, the member of staff with a disability will be given appropriate training/retraining.

## **4.3 Working environment**

38. We define a work environment as a physical and emotional space in which our staff perform their day to day tasks. We divide our working environment into the following three elements:
  - Physical environment. This relates to the layout and facilities of an in-person office and includes, for example, desk space, lighting and location. For those staff working remotely, the physical environment relates to, for example, software, the home workstation, equipment needed to complete work and lighting;
  - Working conditions. These include contractual terms of employment such as pay, reporting structure and health and safety matters. It could also include any non-contractual benefits;
  - Our company culture. This element describes how we as an organisation function on a social level; this includes formal aspects such as our Purpose and Values. Informal areas could include office politics and the social behaviours of colleagues.
39. Bloomsbury Institute will take reasonable steps to ensure that the working environment enables staff with a disability to take up and retain posts for which they are suitably experienced and/or qualified.

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<sup>11</sup> <https://lsbm.breathehr.com>

40. Wherever possible staff with a disability will be consulted over changes to the working environment and employment practices to ensure that, so far as is reasonably practicable, their needs are recognised and met.
41. Where appropriate, advice about such changes will be sought from the line manager and professional advice from the People, Talent and Culture Manager, Disability and Wellbeing Manager and Estates and Facilities Manager, where adaptations to premises are required.
42. We will, as far as is reasonably practicable, provide auxiliary aids, equipment funded, if possible, through Access to Work, or adaptations to premises. Where reasonably practicable, jobs may be restructured to enable disabled staff to work with the maximum effectiveness and efficiency.
43. All of our managers must seek to establish working conditions which encourage the full participation of staff with a disability where it is reasonably practicable to do so. Managers must also do what is reasonably practicable to ensure the retention of existing disabled staff through the adjustment of work and/or working arrangements, training or other appropriate measures, where necessary with specialist advice from the People, Talent and Culture Manager, advice received from our Disability and Wellbeing Manager and an Occupational Health Advisor.
44. When Bloomsbury Institute invest in new or refurbished buildings every practical effort will be made to anticipate for the needs of staff with a disability.
45. The work of Bloomsbury Institute that ensures the needs of staff with a disability are taken into account is overseen by our Equality, Diversity and Inclusion Committee and through our [Equality, Diversity and Inclusion Policy](#)<sup>12</sup>.

## 4.4 Disclosing a disability

46. All members of staff are encouraged to share information on their disability with their line manager, the Disability and Wellbeing Manager or the People, Talent and Culture Manager and to request adjustment to the working environment. Our staff inductions include sessions with the line manager, the People, Talent and Culture Manager and the Disability and Wellbeing Manager and provide an early opportunity for staff to share such information. Every effort will then be made to put reasonable adjustments in place. Any such information is treated as confidential and is managed in accordance with the requirements of the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 both of which have informed our own [Data Protection Policy](#).<sup>13</sup>
47. As detailed in our Staff Recruitment and Development Policy, we offer people with a disability a guaranteed interview and will make reasonable adjustments to all stages of the recruitment process as required in order for a candidate with a disability to fully demonstrate their suitability for the post.

## 4.5 Complaints

48. Members of staff who believe they have not been treated equitably in accordance with this policy are encouraged to raise their concerns with their line manager or seek advice from the People, Talent and Culture Manager or the Disability and Wellbeing Manager. Where possible, the aim will be to address such concerns informally. Mediation may also be considered as an informal approach to deal with concerns prior to a member of staff pursuing a formal complaint in accordance with the [Staff Grievance Procedures](#)<sup>14</sup>.

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<sup>12</sup> <https://www.bil.ac.uk/qem/policies/>

<sup>13</sup> <https://www.bil.ac.uk/qem/policies/>

<sup>14</sup> <https://lsbm.breathehr.com>

There is an expectation that every effort will be made to resolve any complaints of harassment through informal procedures, including complaints of harassment related to a disability. Our [Harassment and Sexual Misconduct Policy](#)<sup>15</sup> provides further information on our approach to responding to incidents.

49. Heads of Department or Division, senior members of staff and line managers are responsible for handling and addressing complaints from members of staff under this policy. A breach of the policy by a member of staff may be dealt with under our [Staff Disciplinary Procedure](#)<sup>16</sup>. Advice on what would be an appropriate outcome should be sought from the People, Talent and Culture Manager. An individual member of staff with a complaint may obtain support from the People, Talent and Culture Manager or the Disability and Wellbeing Manager.
50. If an applicant wishes to complain about a disability issue in relation to our recruitment and selection procedures in general, this should be made to the People, Talent and Culture Manager who will arrange for the matter to be investigated and for the applicant to receive a response, including a summary of any action taken.
51. Any action taken under the Institute's Staff Grievance Procedures is without prejudice to any statutory right to make a complaint under the Equality Act 2010 to an Employment Tribunal or other appropriate statutory body, or to involve the Equality and Human Rights Commission or any other appropriate external body.
52. So far as is reasonably practicable, the Institute will protect members of staff or job applicants who make a complaint under these procedures from victimisation.

## **5. Guidance on supporting new and existing staff**

### **5.1 Introduction**

53. This guidance sets out the process for supporting new and existing staff with a disability. The aim is to create a framework for a collaborative dialogue between the member of staff and their line manager with professional advice being sought from the People, Talent and Culture Manager, the Disability and Wellbeing Manager, the Estates and Facilities Manager and where appropriate specialist external agencies to ensure the member of staff is supported effectively.
54. All information exchanged as part of the collaborative dialogue will be treated confidentially and with sensitivity and will only be passed on to other colleagues with the consent of the staff member concerned when that is necessary in order that the Institute can appropriately address matters with the member of staff and meet its obligations under equality, employment and health and safety legislation. The member of staff will be kept informed when information about them is being provided to other relevant parties.

### **5.2 New members of staff**

55. The Disability and Wellbeing Manager will advise the recruiting manager on any reasonable adjustments that are to be put in place during the recruitment and selection process.
56. During onboarding or in the early stages of employment, if any potential Health and Safety issues are identified by the recruiting manager, line manager, People, Talent and Culture Manager or Disability and Wellbeing Manager, these will be raised with the Estates and Facilities Manager.

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<sup>15</sup> <https://www.bil.ac.uk/qem/policies/>

<sup>16</sup> <https://lsbm.breathehr.com>

57. Once the member of staff begins employment, the line manager in consultation with the People, Talent and Culture Manager will decide what reasonable adjustments are to be put in place.
58. The Disability and Wellbeing Manager will, as required, provide specialist advice in partnership with the People, Talent and Culture Manager. The specialist advice will include auxiliary aids, equipment or other reasonable adjustments to the member of staff and their line manager, who is responsible for ensuring that appropriate adjustments are put in place as soon as reasonably practicable.

### **5.3 Current staff**

59. If a member of staff not previously having a disability then becomes so or experiences a change in a pre-existing disability, the Institute will consider and implement reasonable adjustments to enable the member of staff to continue in their role. It is the responsibility of the line manager to ensure that their disability is appropriately assessed and that reasonable adjustments are implemented. Confidentiality will be maintained by relevant colleagues who, with the consent of the staff member, may be provided with relevant information on a need-to-know basis.
60. When a member of staff has a disability that they are well used to managing, and there is some change in their condition or the requirements of their work then a review of their support arrangements/reasonable adjustments may be necessary. A dialogue between the member of staff, their line manager and the People, Talent and Culture Manager may be the most appropriate starting point. A referral to an Occupational Health Provider or Access to Work would usually then be initiated if a further assessment is required.

Typically, there are four stages to the process:

#### Stage 1 – Initial dialogue

The initial step is for the member of staff to talk to their line manager about their disability. Staff should record the nature of their disability in Breathe HR Online<sup>17</sup> under “Adding a medical fact” in the “More” tab. If the line manager is aware of the disability and/or is seeing signs that a disability has an impact upon the member of staff’s ability to carry out their role, they should initiate discussion with them.

The line manager handling the matter should inform the People, Talent and Culture Manager and agree with him how to take the matter forward, consulting and informing the member of staff throughout.

If for any reason the member of staff does not feel able to have the initial conversation with their line manager they should talk to the People, Talent and Culture Manager. The People, Talent and Culture Manager will seek to facilitate a three-way dialogue involving themselves, the member of staff and their line manager.

Either the member of staff or the line manager may consult the Disability and Wellbeing Manager in an advisory capacity including discussing what previous reasonable adjustments and auxiliary aids have proved useful. However, no adjustments will be put in place until an assessment has been undertaken and agreed with the line manager, involving the People, Talent and Culture Manager as appropriate. This is to ensure that reasonable adjustments can be put in place with professional advice as soon as possible avoiding, in most cases multiple attempts to make adjustments.

If any potential or actual Health and Safety issues, for example, fire safety and the need for a Personal Emergency Evacuation Plan (PEEP) are identified these need to be brought to the attention of the Estates and Facilities Manager immediately.

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<sup>17</sup> Members of staff should note that noting their disability status on Breathe HR Online will not alert anyone. Direct communication is required with the line manager to start the process of identifying support needs.

## Stage 2 – Assessment of disability

It is important that the aspects of the disability detailed below are assessed before seeking to identify the most appropriate course of action:

- the nature and current level of severity of the disability;
- the impact of the disability upon the staff member's work;
- the impact of work upon the health of the member of staff.

In order to obtain an assessment, in most cases a referral should be made to an Occupational Health Provider (via the People, Talent and Culture Manager) who will make the assessment, often obtaining information from those providing health care to the member of staff.

## Stage 3 – Impact of assessment and needs

Once the nature and an understanding of the current impact on work of the disability is established in discussion with the member of staff, reasonable adjustments may then be considered to enable the individual to undertake their role.

Staff may be advised to apply to Access to Work who currently provide funding for reasonable adjustments.

Whatever the employment status of the applicant, Access to Work will pay 100% of the approved costs of:

- additional costs of travel to work for people who are unable to use public transport;
- a support worker or reader to provide help in the workplace;
- a communicator for support at job interviews.<sup>18</sup>

Occupational Health, as part of their assessment of the disability, will identify if adjustments need to be made and forward information of these to the People, Talent and Culture Manager who in turn, will pass onto the line manager. It is the responsibility of the line manager, in consultation with the People, Talent and Culture Manager, to decide what adjustments can reasonably be made in the specific context in which the member of staff is working. Advice may also need to be sought from the Estates and Facilities Manager before agreeing a course of action. Where adjustments include proposed changes to the Institute's estate, the Chief Operating Officer and Chief Financial Officer would also need to be consulted.

## Stage 4 – Action

Following assessment one or more of a number of possible courses of action may be required. Key examples include:

- **Reasonable adjustments to role.** In some cases, it may be that the member of staff may be unable to undertake a limited number of duties associated with their role. Where the changes are minor and do not substantially affect the role, it may be possible to redistribute work within the section so that they can continue in their role. However, where adjustments to the role are significant, discussions regarding the impact of these adjustments need to take place. The People, Talent and Culture Manager should be involved in discussions with the line manager prior to any role adjustment(s) being agreed. This is to ensure that what is agreed is appropriate for the member of staff and any colleagues whose duties may be affected by any proposed changes. The member of staff and their line manager should discuss on an ongoing basis that the adjustments continue to be necessary and effective;

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<sup>18</sup> [Extract from the 'Disability Rights UK Factsheet F27-Access to Work'](#)

- **Provision of equipment and auxiliary aids identified through assessment.** This might range from a specialist operator chair for someone experiencing back, neck or shoulder pain, to voice-activated software for someone diagnosed as dyslexic through to a suite of equipment for someone with a serious visual impairment;
- **Provision of physical adjustments to the Institute Estate (7 Bedford Square only).** In consultation with the Chief Operating Officer and Chief Financial Officer, physical adjustments to our Physical Self-Managed Estate at Bedford Square (and if/where possible, to our rented Estate) as a reasonable adjustment will be given due consideration;
- **Redeployment Options.** Where it is concluded that the nature and impact of the disability means it is not possible to make adjustments for the member of staff to safely continue in their current role, the Institute has an obligation to explore whether there are vacancies in roles or alternative roles that the member of staff could undertake. Any such redeployment (or the exploration of) would be managed by the People, Talent and Culture Manager in consultation with relevant colleagues;
- **Attendance Management Procedures**<sup>19</sup>. There may be occasions where despite making reasonable adjustments the member of staff is no longer able to continue working at the Institute. In these circumstances, our Attendance Management Procedures will be followed which may culminate in termination of employment on grounds of capability.

## 5.4 Meeting costs

61. In many cases the costs associated with providing appropriate technology or equipment are relatively small and can be met through the People, Talent and Culture budget. In some instances, Access to Work will assist with a proportion of the costs.
62. Where costs are likely to be significant, for example in the provision of highly sophisticated equipment, changes to our physical self-managed estate (7 Bedford Square) or changes to our rented estate (for example, the need for additional space), the line manager should discuss costs with the Chief Operating Officer and Chief Financial Officer. Only in cases where members of staff have a disability as defined by the Equality Act 2010 can their division apply for corporate funding.

## 5.5 Support

63. In addition to any help or advice from the People, Talent and Culture Manager, line manager or Disability and Wellbeing Manager, staff have access to our Employee Assistance Programme – Health Assured. Health Assured provides staff with free, confidential and independent advice and counselling support. Details on how to access this service can be found in our [Staff Benefits document](#)<sup>20</sup>.
64. The Institute has also signed up with Togetherall. Togetherall is an online peer support community where our staff can receive and give mental health and wellbeing support. Togetherall is an online community managed 24/7 by clinical professionals – it's a safe space. Staff have access to Togetherall for free. Staff can register using their Bloomsbury Institute email address at [www.togetherall.com](http://www.togetherall.com).

## 6. Our memberships

65. We are members of the following organisations:

<sup>19</sup> <https://lsbm.breathehr.com> s://lsbm.breathehr.com

<sup>20</sup> <https://lsbm.breathehr.com> s://lsbm.breathehr.com

- Disability Confident Employer – we are a Level 2 member
- Association of Dyslexia Specialists in Higher Education (ADSHE)
- Mindful Employer signatory
- NADP, the Professional Association for disability and inclusivity practitioners in further and higher education

## **7. Related policies and procedures**

- Staff Recruitment and Development Policy
- Equality, Diversity and Inclusion Policy
- Harassment and Sexual Misconduct Policy
- Attendance Management Procedures
- Data Protection Policy
- Dignity and Respect Policy