



Report for Surrey County Council Disabled Workers Review

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Section 1: Introduction

The Disabled Workforce Review was commissioned by Surrey County Council (SCC) to better understand the lived experience of disabled colleagues working within the Authority in order to develop its approach in this area. It was commissioned by Chris Barton, Employee Experience Lead.

The project involved a review of selected HR policies in relation to disability inclusive best practice along with primary research to gather disabled colleagues' views and experiences. This involved connecting directly with disabled colleagues, as well as the disability staff network (DENIS), Trade Union representatives and EDI leads from across the organisation.

It is important to note the nature of a report such as this tends to concentrate on areas where SCC needs to develop and improve its approach to disability inclusion. However, it should be noted that much positive work and activities already takes place and the purpose of the report's recommendations are to move these positive activities into a consistent business as usual approach.

The views of stakeholders who engaged in this review have been presented as they were expressed, whilst also protecting confidentiality where appropriate. This does not mean that the project team always agreed with these perspectives and where best practice recommendations differ from views expressed, these have been presented in the report.

The purpose of this report is to highlight those experiences, as compared to best practice (as determined by the experience and expertise of the BDF) and to make recommendations on how SCC can develop their disability inclusive practices.

Section 2: Context for the report

The discussion, analysis and recommendations included in this report as based on best practice, as determined by the BDF's experience and expertise in the field of disability inclusion as illustrated by its global leading Disability Smart Framework (www.businessdisabilityforum.org.uk). We are committed to sharing this best practice and to support organisations to move away from a legal compliance approach.

Please note for ease of reference we use the terms *disabled person / disabled people* as a term which reflects the social model approach to managing disability. In doing so we recognise the different views, preferences, and attitudes that different people hold about the use of terminology and language.

Best practice suggests the term *workplace adjustments* is more appropriate than reasonable adjustments, as this establishes it as a requirement for disabled colleagues to succeed, rather than an option to be considered. We have therefore used the term workplace throughout this report.

A broader discussion around best practice can be found at Appendix 4.

Section 3: Executive Summary

SCC has made some positive steps towards becoming a disability inclusive organisation and there are undoubtedly islands of good practice in different Directorates. However, there continues to be significant barriers being experienced by some disabled colleagues, with issues identified at each stage of the employee life cycle.

The Council lacks an overall strategic approach to disability and making the workplace adjustments disabled colleagues need, as part of a business-as-usual approach.

Such a strategic approach needs to be established by a strong and coherent commitment from senior leadership throughout the organisation and backed up by action plans to deliver on these commitments. This would have a significant impact on the organisational culture and how it views disability in general and disabled people's requirements in particular.

HR policies currently make positive commitments towards supporting disabled colleagues, but lack specific detail and guidance on how line managers should deliver these commitments. This leads to an overuse of managers' discretion which in turn creates significant inconsistencies. This then leads to a situation where line managers who are engaged and committed to supporting disabled colleagues find the right solution, whilst those who are not, provide little or no support.

The Council policies and approach to recruitment & selection and onboarding demonstrates some areas of good practice but a lack of guidance and expertise of hiring managers creates inconsistency in the experience of disabled colleagues.

A good start has been made with the Workplace Adjustment Process and this has the potential to be an example of good practice, however, it is essential that the recommendations from the Workplace Adjustment Process review are implemented, with a specific urgency around the introduction of a Workplace Adjustment Policy.

Relationships between line managers and disabled colleagues can be very positive and examples were shared with managers providing the levels of support which allow disabled people to excel in their role. However, there is a significant lack of consistency, with some disabled colleagues finding it almost impossible to get agreement for the workplace adjustments they require and this must be addressed as a matter of priority to ensure an inclusive approach and to mitigate legal risks.

This lack of consistency was also experienced by a significant number of disabled colleagues who engaged with this review in the application of HR policies. The experience of disabled colleagues was dependant on how line managers interpreted and applied HR policies, with some disabled colleagues feeling they were being 'used against them' rather than as a source of support.

The career and personal development opportunities for disabled colleagues again demonstrated a mixed response. Some felt that their disability did not impact on their opportunities to develop within their role at the Council. A significant minority felt that their

disability had an adverse impact to the point where they felt there was little point in seeking promotion or even a permanent role (as opposed to a temporary or bank role.)

This was further impacted by access to training and development opportunities. Although some disabled colleagues found that the adjustments they required were made to allow them to access training, others found that their accessibility needs were either not built into the process or were actively denied.

Accessibility of the built environment was a common theme, with a significant number of examples of barriers being shared. These included examples which should be considered a basic requirement such as access to and around buildings and inadequate access to basic hygiene facilities. It is important to note that this review did not involve an access audit and so this report presents the lived experience of disabled colleagues, rather than a comprehensive review.

Finally, we did not see any evidence of an integrated training and development programme to build skills, knowledge and confidence in supporting disabled colleagues, both for line managers and the wider employee population which further undermined individuals' ability to develop a sustainable best practice approach.

Section 4: Methodology

The methodology used in this review was based on the approach in our proposal in December 2022. This was used as the basis for the Disabled Workforce Review Project Plan. The Terms of Reference for the review are at Appendix 1.

A project review group was established by the SCC project lead, Chris Barton. The group consisted of representatives from the People and Change team, DENIS, trade union representatives, Communications and EDI colleagues and BDF project team members, details of which are at Appendix 1. This group met on a fortnightly basis throughout the review to guide the process and make key decisions on the key activities in the review.

A Communication and Engagement Plan was agreed, covering all aspects of the review. This document guided how and when both Council colleagues and BDF project team members would engage with colleagues across the organisation during the key stages of the review.

The project was split into two stages:

- Desktop review of HR policies
- Primary research into the lived experiences of disabled colleagues.

The review of HR policies focused on the:

- Absence Management Policy;
- Agile Working Policy;
- Ending bullying and Harassment Policy;
- Equal Opportunities in Employment;

- Grievance Policy; and
- Performance Capability Policy.

The purpose of the desktop review was to assess current Council HR policies against best practice and provide a benchmark in relation to disability inclusion. It also provided themes to explore during the primary research element of the review, to test out the lived experience of disabled colleagues in comparison to the stated objectives of the policy.

The primary research element of the review involved a number of different stakeholder groups, using different engagement activities. These included:

- focus groups with disabled colleagues;
- one-to-one conversations with disabled colleagues;
- meeting with DENIS members and Trade Union representatives;
- meetings with the EDI leads from each Directorate;
- meeting with HR and Employee Experience colleagues;
- meeting with the EDI Forum members.

It was recognised at the outset of the review, that it was important to connect with a wide range of perspectives to inform and influence the outcomes of the project. DENIS members and Trade Union representatives felt it was important to ensure, as far as possible, anonymity for colleagues engaging with the review to encourage people to honestly share their lived experience.

Council colleagues led a strong communications campaign across the organisation to inform colleagues of the review and to encourage participation. This included:

- all employee emails;
- a hard copy letter was sent to all colleagues who did not have easy access to a Council email address; and
- messages were displayed on the Council intranet and EDI hub pages.

BDF established an independent route for staff to express their interest in engaging with the review and to share their lived experience.

BDF facilitated nine focus groups which took place over 3 days and were scheduled at different times of the day, to allow people to attend these discussions within their normal working day (or outside of it if this was their preference).

In addition to the focus groups, anyone wishing to engage individually with a member of the project team were offered the opportunity to have a one-to-one conversation. This was important to offer as some colleagues were not able to attend the scheduled focus groups or felt that the experience they wanted to share was private and did not feel comfortable attending a wider focus group.

A further opportunity was offered to any colleague who wished to send their experiences and comments via email to the independent BDF email address.

Members of the BDF project team met separately with DENIS members and with Trade Union representatives to both understand their experiences and for them to share the range of disability related casework they had been involved with.

Meetings were held with Directorate EDI leads and the EDI Forum, to understand the perspective of different parts of the organisation and to ensure the review took into account all work streams across the Council.

BDF also met with HR and Employee Experience colleagues to review HR statistics, to understand the Workplace Adjustment Process and to explore which were the most relevant and appropriate HR policies to review.

Further details on engagement levels during the primary research is at Appendix 2.

The project review group continued to meet fortnightly throughout the duration of the project. The draft report was submitted to this group for initial feedback, before being signed off and shared with key stakeholders across the Council.

Section 5: Review of HR Policies

In this section, we have identified areas of best practice that we would expect disability inclusive organisations to demonstrate. This is followed by what we found at the Council, together with our recommendations for developing best practice.

5.1 Absence Management Policy

Best practice approaches to an Absence Management Policy include:

- a clear and transparent process for monitoring attendance and recording absence;
- a definition for disability related sickness absence and an explanation for how this will be monitored;
- an explanation of how disability related sickness absence will be managed, based on an individual assessment of need;
- account should be taken of different types of absence (e.g., short term unplanned, short term planned, long term unplanned and long term planned) and what ongoing contact should look like in their different situations.

Our Assessment

The Policy has an Equality Impact Statement which encourages line managers to have a conversation on Equality, Diversity and Inclusion issues. This references disability specifically and states this should include undiagnosed conditions, which is good practice. This could be developed further by providing additional guidance on what this conversation involve.

The policy refers to recording and managing disability related sickness absence separately. However, it does not provide an explanation of how to determine if the absence is disability related, where to record this and how to effectively manage absence in these circumstances.

A general statement about workplace adjustments is made in the policy, which refers primarily to the legal implications of not making such adjustments and where the recommendations may come from. It would be helpful to provide managers with broader direction as to what types of adjustments may be required for disabled colleagues, including adjustments to the way the policy is applied and absence managed. This should promote making adjustments as a way to help improve or maintain wellbeing, attendance and productivity, as well as minimising legal risk.

Our recommendations

Additional guidance (either separate to or as an appendix to the Absence Management Policy) needs to be provided to line managers. This should address:

- how disability related sickness absence is monitored, recorded and managed; and
- the importance of making workplace adjustments, and how and when to make them in the application of the policy.

5.2 Agile Working Policy

Best practice approaches to an Agile Working Policy include:

- a clear and transparent explanation of the Council's approach to agile working, with an explanation of how this will work in practice;
- an explanation of how workplace adjustment requirements will be discussed, agreed and actioned in relation to both office and home working;
- a strong commitment to ensure workplace adjustments are provided in different working environments, appropriate to the context.

Our Assessment

The Agile Working Policy sets out the organisational perspective of what agile working is and how it will benefit employees and service delivery. However, there is no reference within the policy to workplace adjustments for disabled colleagues. This needs to be an integral aspect of the policy, to ensure, where appropriate, workplace adjustments agreed in the office are replicated in other regular work environments.

Line managers should be provided with guidance on the importance of ensuring workplace adjustments are discussed and agreed within the context of agile working and this are reviewed regularly.

Our recommendations

Review the Agile Working Policy to incorporate the steps line managers need to take in discussing, agreeing and actioning workplace adjustments when disabled colleagues are utilising agile working practices.

The guidance for managers should be clear about agile working as a workplace adjustment.

5.3 Ending Bullying and Harassment Policy

Best practice approaches to a Bullying and Harassment Policy include:

- a strong commitment to tackling any form of bullying and harassment, including actions relating to disabled or neurodiverse people and those with a long-term health condition;
- illustrative examples of what may be considered bullying and harassment, including issues relating to disability;
- a clear and transparent process to tackling bullying and harassment;
- the process for making adjustments to the application of the policy where this is required for disabled colleagues.

Our Assessment

There is a good overall commitment to ensuring bullying and harassment does not occur and to put a process in place for addressing situations should they arise. As referenced elsewhere in this report, the standard EDI statement is included, which would benefit from further guidance on what this could look like in practice, including how it relates to disability.

It would be useful to include additional guidance specific to disability including establishing the principle that an unreasonable refusal to discuss disability related issues (including workplace adjustments) by a line manager may constitute bullying as an abuse of power.

It may also be helpful to provide further explanation of terms such as 'ableist' and 'disablist' to ensure all managers and colleagues understand these terms. Best practice would avoid using terms such as these which can easily be misunderstood and focus on avoiding using derogatory or demeaning terms or language.

As with all HR policies, workplace adjustments may be required for disabled colleagues and this should be addressed within the policy.

Our recommendations

Review the Ending Bullying and Harassment Policy to ensure it provides sufficient guidance and protocols around supporting disabled colleagues, specifically in relation to understanding terminology, the use of language and what may constitute disability related bullying or harassment.

5.4 Equal Opportunities in Employment

Best practice approaches to an Equal Opportunities Policy include:

- a strong commitment to ensuring all colleagues within the Council are treated equitably and have access to the full range of opportunities, with the workplace adjustments they require;
- specific commitments are made towards ensuring full access to all opportunities in employment for disabled colleagues;

- a clear and transparent process for dealing with situations where colleagues feel their access to opportunities have been negatively affected by actions of the Council and its employees.

Our Assessment

The Equal Opportunities in Employment Policy has a number of sections relating to disability, which does clearly demonstrate the importance the Council places on disability inclusion. However, the Policy contains a mixture between policy and general guidance to line managers, which makes it difficult to follow at times. It would be better to separate out the strategic policy commitments of the Council and provide separate guidance to line managers on how to make these commitments a reality.

The Policy makes a commitment to 'minor' adaptations to equipment and premises where this is essential. The Workplace Adjustment Process needs to be defined and driven by the workplace adjustments a disabled colleague requires, rather than being limited only to 'minor' adaptations or those which might be considered as 'essential'. This approach opens up a potential for interpretation which is likely to lead to inconsistencies, may create legal risks and is not best practice. Given the size of the Council, the adjustment required may in fact not be 'minor' but it may be reasonable.

Significant parts of the Policy are now out of date, with references to sources of support, that have now been replaced. For example the Empowers Forum on Disability is now known as the Business Disability Forum and the 'two ticks' scheme is referred to as the Disability Confident Employers Scheme.

The Policy needs to reflect current Council policy and reflect the current workplace adjustment process and connections to Microlink. For example, it should reflect the Council's commitment to ensuring workplace adjustments are in place from day 1. Where this does not occur, probationary monitoring should not occur until they are in place.

The Policy generally takes a medical model approach, by focusing on specific disabilities and conditions, with guidance for what actions line managers need to take and what people with these conditions will need. The best practice approach is to use the Social Model, which focuses on the overall barriers a disabled person may experience and identify strategic approaches to overcoming these barriers. (See Appendix 4 for a discussion of the social model).

Some statements in the policy are clearly well intentioned, but can create a negative perception of disabled people. For example, stating that disabled colleagues do not usually require more managerial support can create a negative first impression or that disabled colleagues are more likely to be nervous when starting employment. It places the disabled colleague in a potentially different light to non-disabled colleagues.

Currently the Policy makes a significant number of high-level commitments, but does not provide an explanation of how these commitments will be delivered. For example, where disabled colleagues are under threat of redundancy, alternative employment should be

sought. There is no explanation of what actions a line manager should take to meet this commitment and suggests it is an option to consider rather than a legal requirement.

The overall policy gives the impression that disabled colleagues are a homogeneous group of people, with whom a set list of tasks need to be undertaken. Best practice would be focused on taking a strategic overall approach to ensuring disability inclusion and then a person-centred approach to the specific adjustments and support requirements each person has.

Our recommendations

Review the Equal Opportunities in Employment Policy to ensure it reflects current best practice.

Provide a strategic commitment to equal opportunities in employment, through this policy, with guidance to line managers provided separately.

5.5 Grievance Policy

Best practice approaches to a Grievance Policy include:

- a strong commitment to ensuring all colleagues have the opportunity to seek redress when they feel unfairly treated, including issues that may relate to disability;
- a clear and transparent process for addressing grievances;
- the process for making adjustments to the application of the policy where this is required for disabled colleagues.

Our Assessment

A clear process is outlined for how colleagues can raise a concern through the Grievance Procedure. As with all HR policies, it is important to acknowledge that a disabled colleague may require a workplace adjustment to the policy and to explain when this may occur and what actions a line manager should take.

The policy does refer colleagues to Trade Union representatives or another colleague for additional support. It is important to recognise that this additional support may be a workplace adjustment which the line manager may need to put in place.

The policy lists issues which may constitute a potential grievance. Consideration should be given to whether a refusal to discuss disability or workplace adjustments or to make an adjustment may be an area where a grievance may occur.

Our recommendations

Review the Grievance Procedure to ensure the need for and process to action workplace adjustment are clearly explained.

Consider whether a refusal to discuss disability or workplace adjustments should be highlighted in the policy as a potential grievance issue.

5.6 Performance Capability Policy

Best practice approaches in a Performance Capability Policy include:

- a strong commitment to ensuring all colleagues, including those with a disability are provided with the necessary support to be able to perform their roles to the required standard;
- a clear and transparent process for monitoring performance capability;
- the process for ensuring all reasonable workplace adjustments is in place, before performance capability action is taken;
- the process for making adjustments to the application of the policy where this is required for disabled colleagues.

Our Assessment

The Performance Capability Policy clearly sets out the Council's approach to supporting colleagues to deliver to the expectations of their role. However, no reference is made to the role and importance of identifying, agreeing and actioning workplace adjustments, which would allow a disabled colleague to meet the requirements of their role. This is a fundamental issue with this policy which needs to be addressed.

The Policy also appears to direct line managers to the Absence Management Policy where disabled colleagues are not meeting the requirements of their role. However, the capability issues may be unrelated to attendance but occur because the person does not have the workplace adjustments in place to allow them to deliver all elements of their role.

As workplace adjustments are not discussed as part of this policy, the process to making adjustments to the process itself is not covered.

Our recommendations

Review the Performance Capability Procedure to ensure that disability and workplace adjustments are referenced in the policy as an integral aspect of performance management.

Section 6: Findings From Primary Research

In this section, we have identified areas of best practice that we would expect disability inclusive organisations to demonstrate. This is followed by what we found at the Council, together with our recommendations for developing best practice.

6.1 Recruitment & Selection and Onboarding

Best practice approaches to recruitment and onboarding include the following aspects:

- A clear commitment in all recruitment materials in making adjustments to the process, including contact details for who an applicant can discuss the role, application and assessment approach with
- Practical evidence of the organisations commitment to being disability confident
- Alternative application methods provided

- A process for implementing adjustment requests and to ensure these are made
- Flexibility in the assessment approaches used
- Accessibility of all elements of the assessment process
- A Workplace Adjustment Process that ensures adjustments are implemented for day one of employment
- Inclusion of prompts in line managers onboarding checklist relating to adjustments and inclusion requirements
- Training and guidance for hiring and line managers on supporting disabled new hires.

Our findings

The Council's commitment to being a Disability Confident organisation attracted some applicants to apply for positions and was viewed positively. However, their experience did not always match the commitments of the scheme, with adjustments not always being provided or applicants being unclear as to what process to follow. It would be helpful to provide more detailed information to applicants on how they can request and agree the adjustments they require in the selection process. For some, it was unclear what action they should take if adjustments are not agreed or implemented. It is not possible to comment on the experience of applicants who were unsuccessful in securing a position, so the lived experience of successful applicants is presented here.

Applicants did not always know if they should tick the disabled box or understand why they should do this. It is important to ask the question in the right way. For example, some people with long term health conditions may not identify as being 'disabled' but still require adjustments to the process. Best practice would suggest asking all applicants if they require any adjustments or additional support during the recruitment process, without necessarily having to share their disability.

It was acknowledged that positive changes have been made to the accessibility of the recruitment and selection process. As an example, some recruitment panels are now providing the interview questions in advance, which supports, for example, neurodivergent applicants to be able to demonstrate their strengths and potential in the interview.

However, there were some examples of changes to the assessment process without prior warning. For example, some applicants were provided with the questions for the interview in advance, but during the interview itself, the panel asked additional and more detailed questions. This negated the adjustment the applicants had in giving time to reflect and structure their answers. It should be noted that probing questions based on the answer provided by the applicant were not viewed as additional questions. The concern raised here was about unrelated questions being asked for which the applicant had no time to consider or prepare for.

The recruitment process is viewed by some as being heavily neurotypical. This reduces the opportunity for neuro diverse applicants to demonstrate their talents and potential. The suggestion was made that neuro diverse applicants would benefit from being able to demonstrate their abilities, rather than express them, thereby enhancing their opportunities to succeed. Greater flexibility in adjustments and assessment methods would be beneficial.

There is a disconnect at times between the recruitment stage and onboarding stage. This was connected both to ensuring information the applicant has shared about their disability is passed on to relevant people and the provision of adjustments. Some applicants shared their disability at the recruitment stage, but this was not connected to the onboarding stage. This resulted in managers not always being aware of the adjustment requirements for new starters.

The process required the new starter to be proactive and assertive in stating their requirements, whereas not all new starters will feel confident in taking this approach. Our experience shows that when disabled people understand why they are being asked these questions and what the information will be used for, they are more likely to respond honestly and explain their requirements at this stage, to facilitate this focus of discussions should be on the effect of someone's disability rather than on the nature of the condition...

Workplace adjustments were not always in place from day one of employment, with some colleagues needing to wait several months before adjustments were effectively in place. This is not the commitment made by the Council, where the goal is to have adjustments in place on day one. It should be noted this could lead to an increased legal and PR risk.

It was suggested that additional information on workplace adjustments could be added to a new starters welcome pack. This would provide new starters with a clear understanding of the Workplace Adjustment process and know who to contact to explain their requirements.

Some internal applicants felt that their skills and experience, which were already known to the interview panel, should be taken into account when applying for internal posts.

Offering work trials, which allow an applicant to demonstrate their skills could be considered a workplace adjustment to provide an alternative form of assessment where an applicant (whether internal or external) would be at a disadvantage if their competencies were only tested by an interview. For example, an applicant who is neurodiverse may not be able to perform as well in such a pressured situation and therefore a comparative assessment is not possible.

It would not be good HR practice to take account of an internal applicant's previous work history with the Council as part of the assessment process, as this is not possible to achieve for external applicants. This would present potential legal risks based on the protected characteristics of the Equality Act 20210.

Illustrative Quotes

"Great experience when first joined, team underwent BSL training etc."

"Didn't declare disability when I joined. Tasks were dyslexia friendly. 2nd time round I explained at interview and had great accommodations."

"The onboarding process is so unstructured. It's the manager's responsibility but it's only as good as the manager you have."

“Culture ‘disability confident employer’ was really attractive and drew me to work for Surrey. Experience didn’t match it.”

“I want to be able to demonstrate rather than have to express what I can do in an interview. It’s very difficult for me to do the latter. I’ve only been successful in junior roles.”

“I don't consider myself as having a disability, see myself as having a medical condition - tick boxes that talk about disability don't work for me.”

Our recommendations

- Ensure the Council is fully compliant with all aspects of the Disability Confident scheme.
- Establish clear and documented protocols for how adjustments will be made in recruitment and selection process and the standards expected, which is driven by individual need
- Promote this on the careers website and all job adverts.
- Establish a system for when and how information about the disability status of a new employee will be shared with the line manager and what the process is for providing workplace adjustments for the first day of employment
- Review information shared about the Workplace Adjustment Process as part of a new employees welcome pack to ensure it provides sufficient detail for the new employee to understand what to expect and understand any actions they need to take. This should include links to the appropriate workplace adjustment provider (Microlink or others) and DENIS.
- Promote willingness to make workplace adjustments in the role at the written offer stage to encourage new hires who require them to ask in advance of Day 1.

6.2 Workplace Adjustments Process

Best practice approaches to the Workplace Adjustment Process

- Commitment - There is a top-down mandate to embed best practice in making adjustments with necessary resources & financial commitment.
- Policy - The organisation has a clear policy on workplace adjustments based on trusting disabled employees & supporting managers.
- Process - Employees follow a clearly defined and documented process that results in effective adjustments being implemented in minimal time.
- Control - The efficiency of the process, along with stakeholder and supplier performance and their quality of service is monitored against KPIs.
- Knowledge - Everyone understands the importance of making adjustments, how to request them, and how to achieve best practice in providing them.
- Service - Employees feel valued and supported through using a simple, stigma-free and customer-centric workplace adjustment service.

Our findings

The existing Workplace Adjustment Process was introduced across the Council in April 2022, with a centralised budget and external provider (Microlink). It provides a specialist

accessibility advice service and aims to provide an efficient, effective and value-based process for disabled colleagues to access the workplace adjustments they require.

The structure of this approach is based on best practice and has achieved its intended outcomes for the majority of colleagues who have used the service. It is important to note that this is not the experience of all disabled colleagues and the Council is aware of the issues that still need to be addressed, as highlighted in the evaluation report produced in 2023. The Council has committed to implementing the recommendations from this review and as such, the evaluation does not need to be discussed further in this report.

The majority of colleagues engaging with the review were aware of the Workplace Adjustment Process, although a minority were unaware of any process. It would be beneficial to increase the communication routes used for the process, so that all colleagues and line managers understand how to access the service.

In particular, managers need to be provided with clear guidance on what the Workplace Adjustment Process is and what their roles and responsibilities are within this. The Council are currently developing a Workplace Adjustment Policy and this, together with guidance for line managers, will be critical in ensuring the Council's approach meets best practice standards.

Very positive experiences were reported for some colleagues, both of Microlink and Access to Work. Comments included "Microlink put me at ease" and "Access to Work was a lifesaver". Examples were shared of recommendations being immediately accepted and acted upon, including providing counselling services.

It is important to note that Access to Work does provide an excellent service, but the application process and delays in assessments and the provision of recommendations can be challenging. It is important to ensure disabled colleagues are supported through the application process and alternative adjustments are considered whilst the assessment and recommendation process is completed.

Individual experiences were overly dependent on the attitudes of their line managers which led to inconsistency in provision of adjustments. Where managers advocated for disabled colleagues and had a solid understanding of the Workplace Adjustment Process, the experience of disabled colleagues was easier and much more positive.

Conversely some colleagues had a negative experience, with examples shared of recommendations not being followed up and adjustments not being put in place. This related to recommendations provided from Microlink, Occupational Health and Access to Work.

The experiences of some disabled colleagues falls far below best practice and is not the position SCC wants to be in. This is detrimental to the employee experience which can lead to disabled colleagues leaving the organisation, along with the associated legal and PR risks.

Many disabled colleagues felt that the Workplace Adjustment Process had to be self-driven by the disabled colleague. Experiences shared included:

- feeling that the Council was ‘doing the person a favour’ by putting adjustments into place, even though the service benefited from these with the wider team;
- the disabled colleague needing to follow up and check themselves if adjustments could be accommodated;
- finding it difficult to identify the team that could provide assistance;
- managers who refused who make a Microlink referral and who did not read the subsequent report; and
- Deaf colleagues who had to source their interpreters, complete the associated paperwork and chase payment for the interpreters.

The perception from DENIS members and Trade Union representatives was that line managers did not always understand that disabled colleagues had a legal entitlement to workplace adjustments, where these were seen as reasonable. Some line managers felt they needed to prioritise workplace adjustments, alongside all other demands for time and resources. This led to a feeling that if line managers provided the degree of flexibility required for a workplace adjustment, they would need to provide the same for all members of the team. As the disability characteristic under the Equality Act is asymmetric (i.e. it gives rights to disabled people but not non-disabled colleagues) as this is not the legal position and potentially places disabled colleagues at a disadvantage as well as creating a potential legal risk to the Council.

There was a mixed experience of the Occupational Health service, with some colleagues having positive experiences both in terms of time taken for the referral and usefulness of the subsequent recommendations. There were some positive experiences around the use of a stress risk plan and how this related to workplace adjustments.

However, for others, the experience was not positive. Some disabled colleagues felt there was an over reliance on Occupational Health referrals, with this being the default response by managers to workplace adjustments requests, even when this was not relevant or appropriate.

A significant number of disabled people felt that the Occupational Health service was reluctant to recommend anything that the Council, and particularly the HR team, would not agree with. This gave the disabled person a feeling that the service was ‘on the side of the employer’ rather than providing an objective independent report and recommendations.

Access to personal data was varied, with some colleagues having to repeatedly share personal information with different stakeholders (e.g., Microlink and Occupational Health) in order to have their needs met. Where multiple referrals to Occupational Health were made (often due to the fluctuating or changing nature of a person’s long term health condition) this required colleagues to continually share their details. Some colleagues did not feel comfortable sharing these personal details, including with their line manager.

Some disabled colleagues experienced long waits to receive the equipment they required, often without getting any progress reports. This left some people feeling that nothing was

being done to address their requirements. The experience involved both Microlink and internal IT based adjustments.

A significant barrier was experienced by some disabled colleagues where an adjustment was either requested or recommended (from Microlink, Occupational Health or Access to Work) and this was not seen to be 'reasonable' and therefore rejected. This would amplify any legal risks and there would certainly need to be a strong case made as to why the adjustment was not reasonable in the circumstances. Additionally, in these situations no alternative solution was considered and the disabled colleague was given the answer that the adjustment was not possible. It is always best practice, and indeed a legal requirement, to consider alternatives where it is not possible to accommodate the original recommendation or request, and keep a record of the decision and the rationale

Challenges were experienced by a significant proportion of disabled colleagues who engaged with this review in obtaining IT based adjustments they required for their role. Challenges included:

- lack of compatibility between the IT infrastructure and the specific assistive technology they required; and
- delays in obtaining the solutions they needed from IT.

From the experience shared, disabled colleagues experienced challenges in obtaining a support worker, including BSL interpreters. These included:

- difficulties in completing the necessary paperwork for Access to Work, where support from the Council was not provided;
- problems in sourcing and then maintaining the services of the support worker; and
- challenges in ensuring support workers received timely payment for the services they provided.

It is important to have a clear process when securing the services of a support worker and ensuring that payment is made. This applies whether the Council is paying the support worker or a claim is made to Access to Work. Roles and responsibilities need to be explained and the process needs to be adequately resourced.

In general, physical adjustments were seen to be easier to access than non-physical such as flexible working patterns or additional breaks, even when these were recommendations in formal reports (such as Access to Work or Occupational Health). There was a feeling that managers did not always view these as workplace adjustments, in the same way as a physical piece of kit. A significant number of disabled colleagues engaging with this review found it difficult (and in some cases not possible) to agree this type of adjustment.

This challenge has been recognised by the Employee Experience team, who are implementing a new stage of the workplace adjustment process, where line managers are required to provide an explanation of why a non-physical adjustment cannot be provided. It will be important to ensure this is effectively followed up and discussions held with the disabled colleague and their line manager to agree what is possible.

Another common theme was disabled colleagues, particularly for neurodivergent people, was finding it difficult to complete the necessary administration to access support. This included completing the Access to Work application process and having to complete the administration required for these adjustments in their own time. Additional support for these activities would be beneficial and would avoid disabled colleagues needing to complete this during non-working hours.

Illustrative Quotes

“Microlink encouraging and put you at ease.”

“A2W recommended accessories and Surrey paid for it all. Counselling was helpful and team aware of some adjustments through attending team meeting.”

“I feel that they have an attitude of doing you a favour by making adjustments, rather than them realising that it can work for everyone involved. My adjustments were minor and actually benefitted the service.

“Microlink recommended a piece of software, but access was denied.”

“I found overall experience is a difficult one to find the suitable team to assist you further with your job and equipment you might need. Some of colleague I work with everyday and the manager currently have are extremely supportive but I do need adjustments and I am having to bring these from home to help me do my job.”

“Self referred to Microlink as manager wouldn’t allow any adjustments. Don’t think manager read the reports.”

“Managers had previously refused providing me with a work station at home and at work so I am now in discomfort - because it cost too much money.”

“Humiliating experience: asked where the disabled toilet was and given guided tour of all disabled toilets in the building after reception had shouted to facilities manager that I needed the toilet. Raised issue, but not sure what is actually being done to ensure this kind of thing doesn’t happen again.”

“I feel like the work that DENIS is doing with the workplace adjustment passports could be positive. Saves repeating the process”

“Even when Microlink said my line manager needed to speak with me around reasonable adjustments - none were agreed. OH recommended a stress risk plan which was breached - managers do not understand processes, policies and procedures themselves and makes situations worse.”

Our recommendations

- Complete the implementation of the recommendations of the Workplace Adjustment Process review.

- As a matter of priority establish a Workplace Adjustment Policy with specific guidance for line managers on the workplace adjustment process including roles and responsibilities of managers, guidance on determining what is reasonable and a clear explanation of the process.
- Senior leadership to promote and reinforce key messages on the importance of ensuring the Workplace Adjustment Process is understood and followed by line managers, positioning this as a productivity and wellbeing tool, in addition to being a legal requirement.

6.3 Line Manager Relationships

Best practice approaches to effective line manager relationships include:

- open, honest and proactive conversations between line managers and disabled colleagues on adjustments and support requirements;
- line managers understand the Workplace Adjustment Process and what their roles and responsibilities are within this;
- adjustments and support required for disabled colleagues are seen as a wellbeing and productivity issues;
- line managers are aware of the impact of their decisions and the language they use and are committed to ensuring disabled colleagues are positively included within the team; This includes knowing what can / cannot be discussed with co-workers and seeking the understanding and agreement regarding that with the disabled colleague.

Our findings

As would be expected there was varied experiences of line manager relationships with their disabled staff members, with some being very positive and supportive, whilst others were more difficult. Colleagues who described a positive relationship provided examples such as managers who:

- were proactive in discussing workplace adjustments;
- understood the Workplace Adjustment Process and knew their role within it;
- liaised with other stakeholders (such as Microlink and IT);
- recognised the productivity and wellbeing aspects of agreeing workplace adjustments;
- made sure the agreed adjustments were implemented quickly and efficiently;
- agreed workplace adjustments relating to flexible working, as well as pieces of kit;
- agreed innovative working patterns that worked well for both the disabled colleague and other members of the team;
- followed up to ensure the adjustments were meeting the disabled colleagues needs; and
- with the wider team, understood the specific needs of the disabled colleague, thereby adapting to their requirements, which led to a more harmonious and productive team.

The experience of a significant minority of disabled colleagues was negative. There was a feeling that the onus was on the disabled person to identify and source the adjustments that they required. Where managers were not supportive, disabled colleagues did not always know where to seek support from if their manager did not engage proactively or

productively with the process. This was particularly reported where disabled colleagues had a non-visible disability, including neurodiversity. There was a feeling that this was treated as a problem.

Some managers took the approach that the disabled colleague 'knew what was best for them and so needed to get on and find what they needed'. Although this may have been perceived by managers as a positive approach, the majority of disabled colleagues engaging with this review found it dismissive and lacked an understanding of the amount of time and effort finding the right solution took.

Lack of knowledge and understanding by line managers, in some cases, led to misinformation; for example, a disabled colleague with dyslexia was told that this was not considered to be a disability under the Equality Act 2010. This can lead to workplace adjustments being denied, as the view is taken that the person is not covered under the Equality Act, whereas this may not be correct.

Importantly, whether a disability is considered to be covered by the Equality Act is complex and usually determined by a Tribunal. This means, in reality, the definition of a disability should not be the driving force when determining workplace adjustments. Best practice focuses on whether the person needs us to do something differently and how we can make this work, rather than the legal compliance of focusing on the law.

Not all line managers appeared to be aware of the Workplace Adjustment service, or their role and responsibilities within this process. They therefore did not always understand the priority and importance of workplace adjustments, what they needed to do to support the disabled colleague or where to signpost for further advice and guidance. The perception of DENIS members and Trade Union representatives was that they needed to step in on occasions to support the disabled colleague, due to a lack of understanding on the part of the line manager, which was disadvantaging the disabled colleague.

In a small number of cases, disabled colleagues felt they were made to feel guilty about their workplace adjustment needs or seen as a 'nuisance', including comments such as "how do you think your absence affects your colleagues?". This approach felt like it lacked empathy and understanding.

There was a specific example of a basic requirement to maintain the persons hygiene and personal dignity which was not met. This should not have been treated as a workplace adjustment request at all, but a basic entitlement within the workplace.

It is important to ensure that both direct line managers and those with 'dotted line' responsibility for the performance of a disabled colleague, understand their needs in terms of workplace adjustments and the same support is provided.

This equally applies when disabled colleagues have an agile working pattern, both attending the office and working from home. It is important to ensure workplace adjustments are provided in both working arrangements. Some disabled colleagues have experienced managers agreeing workplace adjustments in the office, but not supporting those required to work from home, regardless of the amount of time this equates to. This issue needs to be

clearly addressed in the Workplace Adjustment Policy to set the policy position and reinforced in the guidance provided to line managers. The guidance specifically needs to address what would be considered 'reasonable' in terms of providing adjustments both in the workplace and when working from home. This will depend upon the context, as a colleague working infrequently from home may not require the same adjustments as a person working consistently from home.

Line managers do need more support in having potentially sensitive conversations, as the experience of some disabled colleagues was that managers did not have the skills or knowledge about how to do this. This led to all parties feeling uncomfortable and issues not being identified and addressed effectively. On occasion, disabled colleagues felt this led to an escalation into a more formal process, rather than having an informal discussion to address concerns from either side. Guidance would be helpful on how to balance the needs of the employee and the manager and what could be considered reasonable. Clear guidance and training needs to be provided for line managers on how to have these potentially sensitive conversations.

Illustrative Quotes

"If job allows you to WFH things are easier."

"Worried about appointments. Miss appointments Haven't taken time off for appointments
"This is my normal, these things happen" Flexibility would be helpful."

"Be good if absence conversations were more exploratory 'we've noticed that you have had these types of absences, what's going on?' "

"I was pestered when I was signed off. It felt like I was being pushed out. I ended up moving to another team."

"I can no longer take time off, as exhausted the processes of AIP, stage 1 capability process, and next stage is stage 2... so I am scared of having another 'crisis' and then getting the sack. This does cause a lot of stress if I'm having a 'dark day' as adds more pressure"

"Lots of linking to stress due to lack of understanding of my condition (the stress is what they're causing me)"

"I don't feel AIP are beneficial to staff with disabilities, ive been told its a supportive measure but it is in fact a punitive measure"

Our recommendations

- Establish clear expectations for line managers in for how disabled colleagues are expected to be supported and ensure these are well communicated.
- Hold line managers accountable for the delivery of these expectations via work objectives and performance appraisals.
- Provide mandatory training for managers around the workplace adjustment process and wider disability confidence training, including how to have potentially sensitive

conversations. This should be coproduced with DENIS and Trade Union representatives to ensure it addresses the types of situations they have encountered.

6.4 Application of HR Policies

Best practice approaches to the application of HR policies include:

- clear and well communicated HR policies which explain how the policy would be applied to disabled colleagues, where differences exist (e.g., how disability related sickness absence should be recorded);
- an organisational commitment, described in each policy, to ensure that adjustments for disabled colleagues are made, where this is appropriate;
- guidance and training for line managers on how policies should be applied and adapted to ensure disabled colleagues are not disadvantaged;
- where ‘managers discretion’ is referred to, guidance on what should be taken into account is provided.

Our findings

There was a general acceptance from the stakeholders who engaged with the review that the HR policy itself was generally sound, but challenges were experienced in the application of these policies.

There appears to be a significant degree of confusion and inconsistency in the interpretation of how disability related sickness absence is recorded and monitored. Some disabled colleagues were confident that disability related sickness absence was recorded separately from other sickness absence and that this did not have a disproportionate impact on their attendance record.

For other colleagues, they did not believe their disability related sickness was recorded separately and that this led to an increased probability of them being subject to the formal attendance management process. To some extent, this is backed up by the HR statistics that shows that 3.9% of disabled colleagues were subject to the formal attendance management process in 2022/23, compared to 1.1% of non-disabled colleagues.

A high proportion of disabled colleagues who engaged with this review reported a sense of fear in relation to the attendance management process, which led some to attend work when in reality, they were not well enough to do so or missing important medical appointments. Words used to describe the process included “punitive” and “accusatorial”. Trade union representatives reported some disabled colleagues feeling scared to take sick leave when they needed it or being told that no further sickness absence was permitted during a specified time. This did not take account of the fluctuating nature of their long-term health condition. This was particularly the case in relation to Attendance Improvement Plans, with some colleagues feeling these were used too quickly and often instead of taking an informal approach first. In some cases, it was felt that AIP’s were used instead of having a constructive conversation around workplace adjustments, which would actually have resolved the attendance issue. This raises a potential legal issue for the Council, if disabled colleagues are more likely to be subject to a formal process than non-disabled colleagues.

It is important to note that some disabled colleagues also have some misunderstanding around the attendance management process. There was a view amongst some people that where absence was recorded as disability related, then this did not count in any way towards attendance management, and there could be no escalation to an AIP and the only action a manager could take was to hold monthly wellbeing meetings. This is not a correct interpretation of best practice or the law and this needs to be articulated in appropriate HR policies to avoid this misunderstanding.

It is important for both managers and colleagues to have a clear understanding of how to record absence (disability related and other) and how this information will be used to support and manage attendance. There needs to be a balance between the individuals needs and those of the service.

A common theme in relation to all HR management practices was concern over the phrase 'managers discretion'. It was felt this led to inconsistencies in the application of HR policies. Where managers were informed and engaged in supporting the disabled colleague, discretion was used positively.

Where managers were less positive, it was felt this discretion was used against the disabled colleague and could be used to escalate situations in order to exit the person from the organisation. Whether this is a reality or not, it is still the perception of some disabled people in the Council. The inconsistency experienced by disabled colleagues could become a legal risk for the Council.

In relation to performance management and specifically the application of the formal process, there was some concern that managers were more likely to address issues formally for disabled colleagues. This, to some extent, is also backed up by the statistics held by HR which indicates in the previous 12 months (2022/23), 1.5% of disabled colleagues have been subject to the formal performance management process, compared with 0.6% of non-disabled colleagues.

Similar figures are reported for disciplinary action, with 1.5% of disabled colleagues being subject to the formal process, compared to 0.9% of non-disabled colleagues.

It should be noted that the HR statistics used here are simply an indication that disabled colleagues may be subject to formal HR processes more frequently than non-disabled colleagues. It is not intended as evidence that inappropriate action is being taken against disabled colleagues. It is, however, worthy of comment and further investigation by Council HR colleagues.

There was a concern expressed that managers continued to expect full performance levels from disabled colleagues and held them accountable to this, even when workplace adjustments had not been agreed or provided. Again this is problematic and may led to a legal risk.

Illustrative Quotes

“In total, I think that my team understand and that we have open conversations about health and wellbeing. I manage 2 people who both have health conditions and I think it has created better mutual understanding.”

“Good manager - he’s not perfect. Don’t expect him to be an expert. He did the leg work getting adjustments in place.”

“New line manager is open - but puts the responsibility for knowledge about adjustments onto me ‘let me know what you need. It would be nice if there could be check in’”

“Asking for accommodations in my department is difficult because of attitude of senior manager.”

“Experienced quite intimidating phone calls when off sick. Pressured into coming back before I was ready. Had to move teams. Neither manager knew how to do stress risk assessment.”

There can be a cultural element about how disability is viewed with certain colleagues (*example of being slapped on leg when viewed as talking too much*)

“I would say that a lot of managers struggle with a lack of understanding and empathy towards disability. Workers feel that they are not listened to and supported and at times judged and deemed not able to carry out their tasks”

“It would help me if I felt I was treated like a human being not a diagnosis. Stop treating me like a problem, have fair workspaces and procedures. Sadly this also extends to service users.”

“I have a supportive manager, but sometimes the higher you go, the less understanding/tolerant managers are of people with a disability. I think more training is required”

“I have underlying conditions (dyslexia and hearing aids) and found it hard to understand my job. I was told I needed to go on an English course to learn English.”

Feels like it can depend on the personality of managers. Some make a change for a week and then go back to what it was like before. There’s a view that if you have ADHD or dyslexia you’re stupid

“Now asked - are you able to do your job effectively due to your issues - before disclosure no one asked these questions - so Managers are very biased and actually discriminatory.”

“Managers roll eyes when saying someone is still off sick. MH issues are unsupported. There should be an independent person to talk to when you are suffering.”

Our recommendations

- Undertake an internal review of HR cases related to attendance, performance and disciplinary policies to determine whether disability has been an influencer in these cases. Best practice recommendations should follow from this review.
- Review and update HR policies to ensure they reflect current best practice in relation to disability inclusion and provide specific guidance for supporting disabled colleagues in the application of these policies.
- Provide guidance and training for managers on the application of HR policies, specifically as they relate to disabled colleagues,
- Provide managers and colleagues with clearer guidance on what constitutes disability related sickness absence, how this will be used and how to record this.
- Monitor performance in these areas in future to ensure the issues are being addressed

6.5 Career and personal development

Best practice approaches to career and personal development would include:

- disabled colleagues are provided with the adjustments and support they require to access the full range of career and personal development opportunities;
- training resources, activities and venues are accessible and where this is not possible, an appropriate alternative is provided;
- disabled colleagues feel supported and empowered to access opportunities and do not feel their adjustment requirements would be a barrier;
- opportunities are provided for disabled colleagues to address their personal barriers and to be supported and encouraged to develop into more senior roles within the Council.

Our findings

There were positive experiences reported of disabled colleagues being supported to fulfil their potential and to apply for alternative roles within the Council, including promotion opportunities. In these cases, workplace adjustments were made, development opportunities were offered and disabled colleagues felt they had the support of their line manager.

In other examples shared, disabled colleagues felt trapped in more junior roles or those on a temporary or bank status, as they did not have in place the things they needed in order to progress. There was a concern that adjustments had not been put in place for their current role and so would not be in place for a more senior role, which led people to not apply for other roles. For example, if additional rest periods were not accommodated in their current roles, some disabled colleagues felt there was little point in applying for more senior roles and their required rest periods were even less likely to be accommodated.

Examples were shared of disabled colleagues not being able to effectively participate in training (both during induction and as part of their role) as adjustments were not accommodated. In some situations, this led to disabled colleagues attending training alone, rather than as part of the wider group, which reduced learning and networking

opportunities and undermined the development of an inclusive culture and might create a legal risk.

In a small number of situations, disabled colleagues were told that no adjustments could be made and no alternative was considered. This resulted in the person not being able to participate in the training offer. This is potentially a breach of the Equality Act 2010, as it places the disabled colleague at a disadvantage in terms of their ability to perform their role and future career or personal development.

Best practice would recommend having a clear, transparent process for the planning, design and delivery of training across the Council which ensures, wherever possible, that this is accessible for disabled colleagues. There needs to be clear roles and responsibilities and a process in place to ensure this happens as a matter of course.

It is recognised that not all training can be made accessible for all (e.g. some aspects of e-learning). However, an alternative must be identified and provided which is discussed and agreed with the disabled colleague. Where adjustments are possible, the training coordinator or other identified officers should have a proactive responsibility to identify and make any workplace adjustments that are required prior to the training intervention being delivered.

Illustrative Quotes

“Applied for 2 roles and got them”

“Neurodiversity training helped to remember that there can be positives to the condition. You’re so often told what you can’t do.”

“I’m stopping myself. “I wouldn’t be qualified to do anything more - I’d be letting down colleagues. Feel I’m letting the team down”

“I don't feel I can look at career development as my condition fluctuates so much which is a shame, as if I was supported more I might be able to consider it.”

“A big thing for me is that I am constantly having to tell people my disability and to ask for documents/ presentations etc to be provided by email at training and meetings so I can see them and its embarrassing to say in front of all attendees - trainers/ meeting chairs should be asking in advance if anyone has accessibility needs so it can be arranged beforehand”

Our recommendations

- Review all Council training initiatives, including induction and onboarding, to ensure they are accessible by design and where possible and that alternatives are well established when they are not.
- Establish accessibility protocols for the development of all future training and personal development activities, to ensure they are accessible by design.

- Consider the feasibility of positive action initiatives to support disabled colleagues to develop in their career, including personal development coaching, mentoring, work shadowing and secondment opportunities.

6.6 Other Themes

Organisational Culture

The overall culture of an organisation and how it views its approach to disability related issues has a significant impact on outcomes for disabled people. The view of multiple stakeholders engaging in this review (including some EDI leads, DENIS members, Trade Union representatives and disabled colleagues) was that SCC was developing a more positive attitude and approach towards disabled colleagues. However, it was also recognised that there was a low baseline and that the positive improvements were not yet the experience of all disabled colleagues.

Examples of taking steps to build a disability inclusive culture included:

- Disability related lunch and learn sessions;
- EDI intranet hub where information is shared;
- ‘Touch base’ sessions at monthly team meetings;
- Involvement of DENIS in key initiatives, including accessibility reviews;
- Positive feedback on the role of staff support networks; and
- A ‘Zen’ hour at the beginning of the day for neurodivergent people.

It should be noted that involvement with and engagement of DENIS members has not always been constructive. Examples were shared of DENIS members being told to ‘stop speaking’ during an accessibility forum. This type of communication does not value or respect the lived experience that disabled colleagues have and can valuably share with the Council.

The involvement of and coproduction with DENIS is important, but should not be viewed as a substitute for formal accessibility audits and testing.

It was reported that some disabled colleagues continue to feel nervous about sharing their disability and workplace adjustment needs for fear that this will be ‘used against them’ or be a catalyst for seeking to exit them from the organisation. Whether this is a reality or not, the perception and fear is real amongst some colleagues.

There was a view that historically, all colleagues were expected to perform in their role to a maximum standard, without any adjustment for the impact of disability or long-term health conditions. There was an acknowledgement that this was a hangover from the past, but there was a concern that with some managers, these expectations remain today. This is not to suggest that line managers should be expected to accept lower levels of performance, but rather workplace adjustments must be in place and working effectively, before an assessment of performance levels is made. This may include a lower quantity of work as a workplace adjustment.

It was also recognised that a lack of consistency across the organisation lead to disabled colleagues having very different experiences as employees. Some disabled people were respected and received the support they needed in order to succeed. Others experienced inflexibility and a lack of value for the contribution they did (or could with the appropriate workplace adjustments) make to the team and overall Service.

There are attitudinal barriers that were highlighted. Indeed There were some negative attitudes expressed towards some disabled colleagues, who were seen as a cost, inconvenience or 'the weak link'. Although these were by far the minority, there were sufficient experiences shared to make it appropriate to raise this as a concern.

A greater proportion of people engaging with this review reported attitudes may be driven by positive intent, but result in negative outcomes for the disabled person. These are attitudes that disempower the disabled colleague and minimise the expectations other have of them. Examples include:

- “ahh poor you” when talking to a person who is a wheelchair user.
- “you’ve done well for yourself despite having a disability”.

In order to encourage disabled colleagues to share their disability and to ask for the workplace adjustments they need, organisations need to proactively build a positive culture where colleagues feel comfortable to share their needs and line managers are supportive and view workplace adjustments as a productivity and wellbeing tool. This requires a move away from the medical or charity model approach to disability and to adopt the social model. Please refer to Appendix 4 for an explanation of these models.

Illustrative Quotes

“We have a very open team culture where disability and wellbeing in general is spoken out honestly and confidentially. Where I have been open and honest about my own struggles, it has allowed others to do the same where they feel comfortable. Wellbeing being a priority in 121s too has helped as it's brings the person and the role together. We definitely have a lot to learn and not perfect- but I think this is helping as I take it seriously for those I manage”

“The culture is trying to shift but the drive for greater inclusivity, accessibility and understanding (i.e. avoiding unconscious bias) for visible and especially hidden disabilities is not followed up on a regular basis or made mandatory, which means it doesn't stick and gets forgotten.”

“Fantastic values. Doesn’t always filter down to individuals. Multiple line managers can have different approaches.”

“In my experience people can speak before they think and really should think about how what they say can devastate someone and knock their confidence - especially in a return to work meeting/wellness meeting. Needs to be supportive and mindful.”

“In my department all have mindset where understanding disability isn’t prioritised - I feel very alone.”

“My personal experience is that you are either well/fit enough to do your job or you aren't but this also depends on what mood your team leader is in on the day!”

“I feel that is something that is avoided, hidden and discriminated by the council (for me local team was good but by higher management and HR). It is a subject that I feel they do not care a great deal about as it they see employees as not "useful" or a burden”

“I find that hidden disabilities get overlooked as colleagues and managers cannot 'see' your condition etc. My health fluctuates daily and as we are so busy, you cannot really have an off day!!”

“The culture is to appear to be interested/ caring but only to tick a box and not actually follow it through”

“Surrey constantly focusses on Money and impact on Service - not how the employee might feel.”

Colleagues “we’re very conscious of the stigma, and mask a lot to avoid it. things are rough for everyone, so when we’re inconvenient because we’re disabled, our colleagues don’t tend to have much patience for it, and sometimes are pretty mean. it feels sometimes like it doesn’t matter how great we are at most of our jobs, it’s the little things we *can’t* do that define us.”

Our recommendations

- Ensure each Directorate has a senior leader with clear responsibility for the strategic approach to disability inclusion within their work area and to have associated work plans to deliver these outcomes.
- Appoint Champions within each Directorate with a plan of activities to actively discuss and promote disability inclusion.
- Encourage Directorates and teams to be more proactive in developing and promoting opportunities for disability inclusion and wellbeing to become a mainstream activity, which everyone engages with.
- Provide training for line managers (within the recommendations included in this report) to provide an understanding of the attitudinal barriers experienced by some disabled colleagues and develop strategies for addressing these.
- Establish an expectation, supported and promoted by senior leadership, that managers are expected to take proactive steps to build a disability inclusive culture, where discussing disability and workplace adjustments are a core element of business as usual.
- Undertake a communication campaign encouraging colleagues to disclose their disability, neurodivergence or long-term health condition, which includes why the data is being collected and what it will be used for, in terms of developing the disabled employee experience.

The Built Environment

A common theme which was identified from each group that was engaged with through this review (i.e., focus groups, one-to-one meetings, DENIS, Trade Union representatives and EDI Directorate leads) was around accessibility of Council premises issues in a number of Council buildings.

Examples of barriers included:

- only being able to access the ground floor of a building, even though the persons role required them to access multiple areas of the building (e.g., needing to access other floors to attend meetings;
- lack of step free access;
- not being able to access parts of a building outside of core hours;
- ineffective emergency evacuation arrangements in place;
- lack of accessible toilet facilities;
- lack of understanding and empathy from non-council workers regarding accessibility, e.g., receptionists.

Significantly, there were examples shared of disabled colleagues not being able to perform their role independently, due to such accessibility issues. They had to rely on other colleagues to perform some tasks on their behalf, only because they were not able to gain access to the specific room they needed to.

Woodhatch was an example frequently quoted of a building where a significant number of people experienced accessibility barriers.

It is important to highlight that this Disabled Workforce Review was not commissioned to undertake an access audit and therefore this report is presenting anecdotal feedback from the lived experience of disabled colleagues. Nevertheless, the amount of feedback provided around lack of accessibility to buildings does suggest that a further piece of work, specifically to undertake an access audit on all or some of the buildings across the Estate, would be highly beneficial to be able to address these ongoing issues.

Connected to this is the importance of ensuring a robust procurement process, which takes account of accessibility when making future estates purchase. This will avoid buying premises which have inherent barriers, which brings liability and costs, in the future.

Our recommendations

- Undertake an accessibility audit for Council premises that do not have one and review existing audits against accessibility best practice guidelines.
- Review procurement protocols (including for the purchase or lease of premises) to ensure accessibility is a core criteria of the purchase

Disability Confidence Training

It was recognised by all stakeholders involved in this review that Disability Confidence training needs to be provided to both managers and staff across the Council.

A lack of empathy and understanding around the lived experience of disabled colleagues, for some disabled people, has a significant detrimental impact on their overall employee experience. There is a recognition that in the majority of cases this is driven by lack of understanding, rather than malicious intent. However, the impact remains the same. As an example, there was a feeling that managers and colleagues did not always understand the impact their language and actions (or lack of) could have on a disabled person, which could be long lasting.

This review has identified training gaps in:

- line managers' understanding of the Workplace Adjustment Process and specifically what their role and responsibilities are within this (including how to determine what is considered 'reasonable');
- supporting managers in being proactive, confident and empathetic in having potentially sensitive conversations with disabled colleagues;
- hiring managers and the adjustments they would be expected to make during the recruitment and selection process, together with how information shared about an applicant's disability should be used and shared during the process;
- specialist support for HR teams in balancing the needs of disabled colleagues with overall service delivery, to ensure the application of HR policies do not discriminate against disabled colleagues for a reason connected to their disability;
- disability Confidence training for colleagues across the Council to build a stronger awareness and understanding of the needs of disabled colleagues.

It is important to avoid taking a medical model approach to training solutions, by focusing on conditions and delivering specific training around this. However, some specialist training interventions would benefit specific groups of colleagues. These could include:

- understanding and supporting neurodivergent colleagues;
- Deaf awareness, including some element of British Sign Language;
- raising awareness of mental health and the links to mental ill-health.

Illustrative Quotes

"I think there is extremely poor organisation-wide knowledge of disability and that there is no mandatory training about disability. I have no idea who I would turn to if I have a disability-related problem that wasn't being addressed by my manager."

"It's not always that people don't want to help, it's just that they don't have the right tools"

Our recommendations

Establish and implement an organisation wide Disability Confidence training programme, to include:

- Disability Confidence for Line managers;
- Disability Inclusion for colleagues involved in recruitment;

- specialist training for HR colleagues to ensure advice and guidance provided to others is based on disability inclusion best practice;
- wider disability awareness for all staff, including those who are working on Council sites who are not directly employed (e.g., receptionists);
- interventions for specialist areas (e.g., neurodiversity, deaf awareness, supporting our mental health);
- disability awareness training for procurement colleagues, to ensure accessibility and inclusion are well established in buying specifications;
- confidence building for disabled colleagues as a positive action initiative.

Section 7: Recommendations

HR Policy Review

Absence Management Policy

- Additional guidance (either separate to or as an appendix to the Absence Management Policy) needs to be provided to line managers. This should address:
 - how disability related sickness absence is monitored, recorded and managed, and
 - how and when to make workplace adjustments to the application of the policy.

Agile Working Policy

- Review the Agile Working Policy to incorporate the steps line managers need to take in discussing, agreeing and actioning workplace adjustments when disabled colleagues are utilising agile working practices.
- The guidance for managers should be clear about agile working as a workplace adjustment.

Ending Bullying & Harassment Policy

- Review the Ending Bullying and Harassment Policy to ensure it provides sufficient guidance and protocols around supporting disabled colleagues, specifically in relation to understanding terminology and what may constitute disability related bullying or harassment.

Equal Opportunities in Employment Policy

- Review the Equal Opportunities in Employment Policy to ensure it reflects current best practice.
- Provide a strategic commitment to equal opportunities in employment, through this policy, with guidance to line managers provided separately.

Grievance Policy

- Review the Grievance Procedure to ensure the need for and process to action workplace adjustment are clearly explained.

- Consider whether a refusal to discuss disability or workplace adjustments should be highlighted in the policy as a potential grievance issue.

Performance Capability Policy

Review the Performance Capability Procedure to ensure that disability and workplace adjustments are referenced in the policy as an integral aspect of performance management.

Recruitment & Onboarding

- Ensure the Council is fully compliant with all aspects of the Disability Confident Scheme.
- Establish clear and documented protocols for how adjustments will be made in recruitment and selection process and the standards expected, which is driven by individual need
- Establish a system for when and how information about the disability status of a new employee will be shared with the line manager and what the process is for providing workplace adjustments for the first day of employment
- Review information shared about the Workplace Adjustment Process as part of a new employees welcome pack to ensure it provides sufficient detail for the new employee to understand what to expect and understand any actions they need to take. This should include links to the appropriate workplace adjustment provider (Microlink or others) and DENIS.
- Promote willingness to make workplace adjustments in the role at the written offer stage to encourage new hires who require them to ask in advance of Day 1.

Workplace Adjustment Process

- Complete the implementation the recommendations of the Workplace Adjustment Process review.
- Establish a Workplace Adjustment Policy with specific guidance for line managers on the WPA process including roles and responsibilities of managers, guidance on determining what is reasonable and a clear explanation of the process.
- Senior leadership to promote and reinforce key messages on the importance of ensuring the Workplace Adjustment Process is understood and followed by line managers, positioning this as a productivity and wellbeing tool, in addition to being a legal requirement.

Line Manager Relationships

- Establish clear expectations for line managers in for how disabled colleagues are expected to be supported and ensure these are well communicated.
- Hold line managers accountable for the delivery of these expectations via work objectives and performance appraisals.
- Provide mandatory training for managers around the workplace adjustment process and wider disability confidence training, including how to have potentially sensitive conversations. This should be coproduced with DENIS and Trade Union representatives to ensure it addresses the types of situations they have encountered.

Application of HR Policies

- Undertake an internal review of HR cases related to attendance, performance and disciplinary policies to determine whether disability has been an influencer in these cases. Best practice recommendations should follow from this review.
- Review and update HR policies to ensure they reflect current best practice in relation to disability inclusion and provide specific guidance for supporting disabled colleagues in the application of these policies.
- Provide guidance and training for managers on the application of HR policies, specifically as they relate to disabled colleagues,
- Provide managers and colleagues with clearer guidance on what constitutes disability related sickness absence, how this will be used and how to record this.

Access to career and personal development opportunities

- Review all Council training initiatives, including induction and onboarding, to ensure they are accessible where possible and that alternatives are well established when they are not.
- Establish accessibility protocols for the development of all future training and personal development activities, to ensure they are accessible by design.
- Consider the feasibility of positive action initiatives to support disabled colleagues to develop in their career, including personal development coaching, mentoring, work shadowing and secondment opportunities.

Organisational Culture

- Ensure each Directorate has a senior leader with clear responsibility for the strategic approach to disability inclusion within their work area and to have associated work plans to deliver these outcomes.
- Appoint Champions within each Directorate with a plan of activities to actively discuss and promote disability inclusion.
- Encourage Directorates and teams to be more proactive in developing and promoting opportunities for disability inclusion and wellbeing to become a mainstream activity, which everyone engages with.
- Provide training for line managers (within the recommendations included in this report) to provide an understanding of the attitudinal barriers experienced by some disabled colleagues and develop strategies for addressing these.
- Establish an expectation, supported and promoted by senior leadership, that managers are expected to take proactive steps to build a disability inclusive culture, where discussing disability and workplace adjustments are a core element of business as usual.
- Undertake a communication campaign encouraging colleagues to disclose their disability, neurodivergence or long-term health condition, which includes why the data is being collected and what it

The Built Environment

- Undertake an accessibility audit for Council premises that do not have one and review existing audits against accessibility best practice guidelines.
- Review procurement protocols (including for the purchase or lease of premises) to ensure accessibility is a core component of the purchase

Provision of Disability Training

Establish and implement an organisation wide Disability Confidence training programme, to include:

- Disability Confidence for Line managers
- Disability Inclusion for colleagues involved in recruitment
- Specialist training for HR colleagues to ensure advice and guidance provided to others is based on disability inclusion best practice
- Wider disability awareness for all staff
- Provide training interventions for specialist areas (e.g. neurodiversity, deaf awareness, supporting our mental health)
- Disability awareness training for procurement colleagues, to ensure accessibility and inclusion are well established in buying specifications.

Section 8: Conclusion

There are many examples of good practice in relation to disability inclusion at the Council. However, these appear to be driven by individuals at all levels of the organisation, who have a strong personal commitment to 'doing the right thing' for disabled colleagues. On an individual level, this can create positive experiences and successful outcomes.

What the Council lacks is an overall strategic approach to disability inclusion across all aspects of the employee life cycle. The BDF Disability Smart Framework provides a structure to be able to assess the Council's policies and approach and takes this strategic approach.

Policies exist which reference disability, but the overall approach lacks a coherent strategic thread which draws these policies together and leads to a consistent experience for disabled colleagues.

The next step for the Council is to develop this strategic approach, lead by senior leadership and underpinned by action plans that will deliver, in a tangible way, the strategic commitments made and based upon the recommendations within this report.

Appendix 1

SCC/Business Disability Forum Disabled Workforce Review Working Group

Terms of Reference

1. General info

SCC's (SCC) Equality, Diversity and Inclusion (EDI) workforce annual plan

includes a commitment to understand more about our disabled staff, their experiences of working in the council and the opportunities that are available to them.

Following an extensive procurement process, the Business Disability Forum (BDF) has been commissioned to undertake this review.

The council, and its EDI Programme Board is committed to implementing the actions which arise from this review.

2. Scope

The role of the Disabled Workforce Review Working Group is to:

- receive progress updates from the BDF on implementation of the agreed action plan;
- identify and mitigate against any risks or issues affecting the implementation of the project plan;
- agree the communication plans for publicising the review and encouraging as many staff as possible to participate in its planned engagement events;
- ensure that the needs and views of disabled staff influence the implementation of the project plan;
- provide updates on the progress of the review to the EDI Programme Board and to People and Change Leadership Team;
- provide an effective means of communication for all forum representatives and other stakeholders. Technical jargon will be avoided and documents and presentations will be accessible and inclusive.

3. Responsibilities

- The Employee Experience Lead will chair meeting and ensures that the group operates in accordance with the Terms of Reference. In their absence, the Head of EDI will chair.
- The BDF project lead (or nominated representative) will provide an update on progress against the project plan (including risks to the project) at each meeting.
- The agenda for each meeting will be set by the chair. The agenda is likely to be based upon the project plan and include:

- reviewing recently completed actions;
 - planning upcoming actions;
 - discussing risks;
 - agreeing communication actions.
- The chair will share the agreed actions from each meeting with all members
 - The AD FM will ensure that all actions and minutes recorded at forum meetings are circulated to all representatives and named stakeholders

4. Meetings

The Working Group will meet every two weeks. Exceptional meetings will be organised to address any urgent issues which may arise.

5. Members

Organisation/group	Name	Role
SCC Disabled Employees Network in Surrey (DENIS)	Vikki Walton-Cole	DENIS co-chair
	Peter Shepherd-Jones	DENIS co-chair
UNISON	Russ Harland	Deputy Chair
	Emma Stephens-DuCros	Co-Equalities Lead and Comms Officer
Business Disability Forum	Clare Cromarty	Project Lead
	Rick Williams	Project member
	Graeme Whippy	Project member
SCC EDI	Nikki Parkhill	Head of EDI (deputy Chair)
SCC Communications	Elliot Small	Communications Officer
	Kirsty Collier	Senior Communications Officer
	Cat McCabe	Communications Manager
	Madeleine Pallas	Internal Communications Manager
SCC People and Change	Heidi Auld	Governance & Contracts Lead
	Molly Aldrich-Wincer	EDI Implementation Consultant
	Sofia Kotlarz	EDI Implementation Consultant
	Chris Barton	Employee Experience Lead (Chair)

Appendix 2

Summary of Engagement with the Primary Research Focus Groups

A total of 9 focus groups were facilitated, with a spread of time slots to maximise opportunities for disabled colleagues to attend.

A total of 92 disabled colleagues signed up to attend a focus group.

A total of 63 disabled colleagues attended.

Individual meetings

6 one-to one meetings were requested and offered.

5 meetings took place.

Meeting with representatives

Meetings took place with DENIS members and Unison representatives

DENs provided written feedback, via a previous recent consultation exercise.

EDI Leads in Directorates

Requests to engage with the review were sent to all Directorates. Meetings took place with EDI leads from the following Directorates:

- Children, Families and Lifelong Learning
- Adult Social Care
- Resources
- Customers and Communities
- Environment, Transport and Infrastructure
- Partnerships, Prosperity & Growth
- Surrey Fire & Rescue Service

Appendix 3

Focus Groups Briefing

Thank you for agreeing to attend a focus group as part of our Disabled Workers Review at SCC.

We wanted to give you a little more information about the session and what we will be talking about.

It will be 75 minutes and you will be able to join via the Teams link.

The session will be run by Suzi MacKenzie from the Business Disability Forum. We want you to feel comfortable sharing your views during the focus group. Please be reassured that your name will not be shared with anyone from the Council and no comments will be attributed to a specific person.

She will be asking about your experience around:

- Joining SCC
- Discussing, agreeing and actioning workplace adjustments
- How HR policies are applied to you as a disabled person
- The support you receive from your line manager, as a disabled person
- Your access to personal and career development
- Whether you feel / experience any barriers, as a disabled person at SCC
- Whether there is anything you would like to see SCC do differently in supporting disabled colleagues? What's the most important thing for you?
- How you would describe the culture of SCC towards disabled colleagues

If you have any access requirements that you have not yet shared with us, please do get in touch so we can put these in place.

Thank you again for investing your time in this focus group and we look forward to hearing about your experiences.

BDF Project Team

Appendix 4

Best practice versus compliance

Relying on the definition of disability under the Equality Act 2010 to consider the nature of disability and what actions and approaches need to be taken is likely to prove challenging. The legal definition of disability is complex and based on a range of apparently subjective tests and not on a list of conditions (there are only 5 conditions specifically covered by the Act.) A best practice approach should not rely on trying to comply with the Equality Act and by applying the definition of disability to identify whether a person is protected, but rather assess and consider the effect of the impairment and address the barriers which might be identified.

The effect of an individual's disability is a dynamic balance and is hugely variable. This means it is simply not possible to design all working practices and systems to be barrier free to all. Indeed one person's access solution might well be another's barrier. This means that there needs to be two linked elements to considering how to deliver maximum accessibility:

- design as much of the Council employment practices and systems to be as barrier free as practicable as a matter of course (inclusive design); and
- be able to make further adjustments for individuals where barriers still remain.

This is also referred to as the Social Model approach.

The models for managing disability

To implement a best practice approach an organisation needs to adopt a methodology and understanding of disability and its implications which allows inclusion to be 'business as usual' and not a 'bolt-on'. Current thinking is that this can only be achieved by using the concepts established in the social model. To understand the social model it is useful to consider earlier models which have not delivered Inclusion and access to services and social engagement.

Charity and medical models

Traditionally the way society and organisations managed disability issues was based around the 'charity' and 'medical' models.

The charity model, while no longer used in terms of policy and management, still plays a strong part in some people's attitudes towards disabled people, which then impacts on their understanding, behaviour and assessment of requirements of this group. At its core is the perception that disabled people need sympathy, looking after, protecting, and that there is little expectation that they will lead an independent and 'normal' life.

As its title implies, the medical model concentrates on disease and impairments and puts what is wrong with someone at the heart of how to address the issue; 'fixing or mitigating the problem' the individual might experience. This might be useful when dealing with health issues. However, it is less helpful when thinking about how a disabled person might access employment opportunities and excel in their role.

The limitation of the medical model is that it concentrates thinking on the conditions and its symptoms, or more likely its stereotypical symptoms, and not any barriers which might be 'designed out'. Based on these views, judgements are made about what individuals can and can't do, what barriers might exist, types of adjustments that might be appropriate and so on. It also makes it harder for an organisation to deal with disability as a mainstream issue, as it is centred on the individual impairment and not on how to identify and address the barriers an individual experiences. Given the range and the variability of the effects of impairments on individuals, this approach cannot deliver a universal solution.

The social model

The social model says it is society or an organisation which creates 'disability' by limiting access to services, products, employment and use of infra structure by the way they go about what they do. If society and organisations worked differently and developed an inclusive approach across the board, a person's impairment would not be an issue. A good example of the social model in action relates to modern buildings. They are required to be accessible and step-free to everyone. This means, if there are no steps into reception, then making a one-off adjustment is not required such as providing a temporary ramp or a separate entrance for people requiring step-free access. Everyone accesses the building in the same way. Access is mainstreamed and no one really thinks about this anymore, as it is just the way things are. In other words, the social model seeks to deal proactively with the root cause of the barriers and not their symptoms.

Barriers can be physical, like buildings not having accessible toilets, or they can be caused by people's attitudes to difference.

The social model helps us to recognise various systemic barriers which make life and employment harder for disabled people. Removing these barriers creates equity and offers disabled people more independence, choice, and control.

Under this model individuals' requirements may manifest in several ways. These can be both visible and non-visible, complex and multiple, and fluctuating. They include, but are not limited to:

- physical differences, e.g., manual dexterity, mobility limitations;
- mental health differences, e.g., depression, anxiety, schizophrenia, bipolar disorder;

- sensory differences, e.g., blindness, loss of some or all vision, being Deafened, deaf, hard of hearing;
- developmental differences e.g., existing since childhood or triggered, developed or diagnosed later in life, which affect motor, cognitive, social and emotional skills, speech and language;
- learning disabilities and difficulties, e.g., Asperger’s syndrome, Down’s syndrome, cerebral palsy;
- learning differences and neuro-differences, e.g., dyslexia, dysgraphia, dyspraxia, attention deficit hyperactivity disorder;
- social and communication differences, such as a speech and language impairment or being on an autism spectrum;
- complex and variable long-term chronic conditions that have both a physical and mental health impact or other complex effects e.g., chronic fatigue syndrome, fibromyalgia, long Covid, chronic pain conditions, cancer, HIV, diabetes, chronic heart disease, epilepsy, and similar.

We recognise that the effect of an impairment on an individual is a dynamic balance between the activity, their confidence, knowledge, socio-cultural influences, and the barriers experienced.

Intersectionality with other protected characteristics

It is important to recognise that for disabled people, their disability or long-term health condition is not their only characteristic. There will also be a range of other factors affecting their life, which can create a unique set of circumstances that interrelate with each other.

For example, we know that race and disability can interact to create a further set of challenges in terms of accessibility. Disability is viewed in a variety of different ways through a cultural or racial lens which can make it more difficult for disabled people from these communities to access employment and other services. How disability is viewed by different communities can make it more challenging for people within these communities to engage with the reality of their disability or long-term health condition and therefore make accessing the support they may need more challenging.

There is also the question of connectedness between the work of the Council when considering intersectionality. For example, if a positive action employment scheme was being developed for a specific protected characteristic the approach and procedures should also ensure their accessibility and not assume the target group should be considered as a stand-alone issue.

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