



THE UNIVERSITY *of* EDINBURGH

## Reasonable Adjustments Policy Equality Impact Assessment – January 2024

A. Key Information	
<b>Policy/practice name:</b>	Reasonable Adjustments Policy
<b>General background/aims of policy/practice:</b>	<p>The Reasonable Adjustments Policy is intended to support the University's commitment to meet its legal duties as defined by the Equality Act 2010, in relation to disabled employees and their right to request reasonable adjustments.</p> <p>The policy is set to clarify existing pathways for employees to request reasonable adjustments and for managers to implement them correctly – providing details on available support, services and adjustments, and other related policies and guidance.</p>
<b>School/Dept:</b>	Human Resources
<b>Assessed by:</b> (name & job title)	Federico Marchioli, HR Partner – EDI
<b>Sign off by:</b> (name & job title)	Dr Caroline Wallace – Head of HR EDI
<b>Sign off date:</b>	January 2025
<b>Review date:</b>	February 2027

B. Reason for EqIA	(check one)
<b>New policy/ practice is proposed</b>	<input checked="" type="checkbox"/>
<b>Change to existing policy/practice is proposed</b>	<input type="checkbox"/>
<b>Other</b> (describe in Section D below)	<input type="checkbox"/>

### C. Who will most be impacted by this proposal?

Consider carefully how your proposal will impact both positively and negatively on people from different groups.

Consider the 9 protected characteristics as below in your proposal. There may be other identity characteristics that you wish to also include in your impact assessment. It is expected that you will consider all equality groups for impact. Please indicate below (with a tick) which groups you feel will be most affected by your proposal.

<b>Age</b>	<input type="checkbox"/>	<b>Race (including ethnicity and nationality)</b>	<input type="checkbox"/>	<b>Marriage and civil partnership<sup>1</sup></b>	<input type="checkbox"/>
<b>Disability</b>	<input checked="" type="checkbox"/>	<b>Religion or belief (including no religion or belief)</b>	<input type="checkbox"/>	<b>Sex</b>	<input type="checkbox"/>
<b>Gender reassignment</b>	<input type="checkbox"/>	<b>Pregnancy and maternity</b>	<input type="checkbox"/>	<b>Sexual orientation</b>	<input type="checkbox"/>
<b>Other characteristics</b>	<input type="checkbox"/>				

#### **D. Consideration of Impact**

Show your considerations of how all of the above protected characteristics may be impacted.

There is no expected direct or impact on the characteristics of Gender Reassignment or, Sexual Orientation. The policy seeks to support disabled employees with requesting reasonable adjustments and has no direct or indirect impact on the experience of these other characteristics, unless having intersecting identities.

Considerations of the impact of the policy on Disability have been made. We have also identified positive impacts on other protected characteristics. These are set out below.

#### **Disability**

In relation to Disability, the expected outcome is for a **positive impact** on disabled people, including those who don't identify as being disabled (e.g., neurodivergent people) or who are unaware that they are disabled. The absence of a Reasonable Adjustments policy has until now been addressed with Guidance but through consultations and continued staff feedback and the need for the creation and implementation of a Reasonable Adjustments policy was deemed necessary.

In the first instance, the policy will contribute to meeting the University's legal duties as defined by the Equality Act 2010 in relation to disabled employees that include making adjustments that will allow them to perform their duties to the best of their abilities, also

<sup>1</sup> Note: only the duty to eliminate discrimination applied to marriage and civil partnership. There is no need to have regard to advancing equality or opportunity or fostering good relations in this respect.

reducing the likelihood of disability-related discrimination and, specifically, failure to make reasonable adjustments

The policy directly supports disabled employees by providing clear procedures for requesting and implementing reasonable adjustments, fostering an inclusive environment, while also providing guidance for managers to overcome stereotypes by focusing on the person and not the condition, ensuring that disabled employees feel supported and understood. In support of these intentions, policy and guidance will be supported by the introduction of an Individual Adjustments Plan (IAP).

The IAP is a record which exclusively focuses on requirements and adjustments, not on conditions. This is particularly important to build trust and encourage conversations around reasonable adjustments. Indirect evidence of lack of trust is given by the fact that we currently have 'no disability information' for 71.1% of the staff across the University, although this percentage may also be impacted by other factors.

Consultations with Disabled staff, Managers, HR colleagues, Trade Unions and Staff Experience Committee have highlighted that the processes described within both policy and guidance are extremely helpful and will support both managers and employees in having more open conversations around reasonable adjustments, making it easier to implement them.

### Age

In relation to Age. The expected outcome is for a **positive impact** on older employees who may benefit from adjustments that accommodate age-related conditions, such as flexible working hours, ergonomic adjustments etc. The prevalence of disability rises with age. In fact, according to the [latest data](#), around 42% of people aged 50-64 in the UK are disabled.

### Race and Religion and Belief

In relation to Race, Religion and Belief, there is a **potential positive impact**. Research shows that people from ethnically minoritised backgrounds and from [specific religious groups](#) in the UK are generally less likely to disclose their disability status compared to their white counterparts due to fear of stigma, lack of trust, and cultural factors amongst others.

Therefore, the policy, in reinforcing the duty to make reasonable adjustments even where disability has not been disclosed, may have a potential positive impact on ethnically minoritised employees.

Further to that, the introduction of the Individual Adjustments Plan may encourage more people from ethnic minorities to discuss disability-related challenges as the form focuses on requirements and support, and not on disability or conditions that may be viewed very negatively depending on cultural differences and attitudes towards it.

### Sex

In relation to Sex. There is a **potential positive impact** because the policy may support gender equality by indirectly addressing any specific gender-related needs, such as adjustments for women returning from maternity leave. The policy can also support women experiencing menopausal symptoms by requesting reasonable adjustments and using the Individual Adjustments Plan that, as described above, will only focus on requirements and support without ever referring to conditions or more specific details.

Further to this, external research shows that men are less likely to seek support from their employer for disabling health conditions (especially in relation to mental health conditions) and from our own data men are less likely to provide disability information. Therefore, the policy, similarly to race, in reinforcing the duty to make reasonable adjustments even where disability has not been disclosed, may have a **potential positive impact** on men.

### Final considerations and summary

Considering the positive impacts for disabled staff and other protected groups too, this policy is going to contribute in fostering good relations and promote understanding of the importance of reasonable adjustments and how they benefit the university as a whole. Simply, the policy will help people understand reasonable adjustments, why they are important, and avoid the risk of seeing them as favouritism.

In conclusion, it is our opinion that the policy will have either positive or neutral impact on staff communities through providing greater clarity on current processes and procedures with particularly positive outcomes for disabled staff. Regular monitoring and feedback of policy implementation will help identify us any unintended negative impacts and ensure continuous improvement.

<b>E. Equality Impact Assessment Outcome</b> Select one of the four options below to indicate how the development/review of the policy/practice will be progressed and state the rationale for the decision.	(check one)
<b>Outcome 1:</b> No change required – the assessment is that the policy/practice is/will be robust.	<input checked="" type="checkbox"/>
<b>Outcome 2:</b> Adjust the policy or practice – this involves taking steps to remove any barriers, to better advance equality and/or to foster good relations.	<input type="checkbox"/>
<b>Outcome 3:</b> Continue the policy or practice despite the potential for adverse impact, and which can be justified.	<input type="checkbox"/>
<b>Outcome 4:</b> Stop the policy or practice as there are adverse effects which cannot be prevented/mitigated/or justified.	<input type="checkbox"/>

### F. Action and Monitoring

Describe any actions you will take to address the findings of this EqIA.

Line Managers Guidance will link to this assessment, in order that managers can raise awareness and consider the various impacts in their consideration of supporting disabled employees.

As support and adjustments can be made informally or formally within local areas with the support of HR, HR Partners will monitor the effectiveness of the application of this policy in supporting employees and managers. We can monitor any feedback about the policy and its application.

Further to that, disability-related resources will be developed alongside face-to-face and virtual conversations around reasonable adjustments will be held by HR EDI and HR more broadly for teams to approach this conversation well and have a better understanding around requests and implementation.

We will work closely with the Disabled Staff Network, to collaborate with disabled staff on the impact and application of the policy. We also acknowledge the EDI Committee, and its Sub-Committees, will bring forward staff voice on the impact of the Policy from our communities.

The policy will be subject to the standard 2-year employment policy cycle review – 2027 or earlier to take into account changes or new content.

## **G. Publish**

Send your completed EqIA to the HR EDI team ([equalitydiversity@ed.ac.uk](mailto:equalitydiversity@ed.ac.uk)) to published, and keep a copy for your own records.