



REASONABLE ADJUSTMENTS POLICY

Executive Summary

At West Midlands Police (WMP), we continually strive to create more inclusive workplaces where we embrace individuality, value diversity, and treat everyone fairly, with both compassion and respect. WMP recognise that equal opportunity and inclusion cannot be guaranteed by a 'one size fits all' approach to policies and practices; some officers and staff are likely to be placed at a greater disadvantage by certain workplace arrangements than others, especially when it comes to disabilities or long-term health conditions.

Reasonable adjustments are changes that are made in order to remove barriers and enable you to perform your role effectively. Under the [Equality Act 2010](#), WMP have a duty to provide these adjustments within the workplace to ensure those with disabilities are not disadvantaged. Additionally, as a Disability Confident Leader, WMP has signed up to making disability equality part of our culture and practice. WMP are committed to creating a more diverse workforce and aim to be an employer of choice.

Authorised Professional Practice (APP)

This policy has been checked against APP and there is none in relation to the subject matter of this policy. WMP has referred to the [College of Policing Workplace Adjustment Toolkit](#) for guidance but adopted a position which reflects local practice and the needs of the communities served by WMP.

Scope

The Chief Constable has overall direction and control of WMP and is ultimately accountable for all policies and supporting documents of the organisation and its actions. Adherence to this force policy will be expected from:

- All WMP Officers, including those within the Special Constabulary
- All WMP Police Staff
- WMP Volunteers

Objectives

This policy aims to:

- Outline the process that should be followed for all workplace adjustments. It covers adjustments which are needed by those with disabilities, long-term physical or mental health conditions, and/or neurodivergence
- Inform how WMP discharge duties under [Equality Act 2010](#)
- Help Line Managers (LM) understand how to effectively implement reasonable adjustments

Acronyms

APP	Authorised Professional Practice
BSL	British Sign Language
DSE	Display Screen Equipment
D&I	Diversity & Inclusion
HR	Human Resources
H&S	Health & Safety
LM	Line Manager
RAP	Reasonable Adjustment Passport



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RAPP	Reasonable Adjustment Passport Panel
SLT	Senior Leadership Team
WMP	West Midlands Police

Policy Statements

1. REASONABLE ADJUSTMENT REMIT

- 1.1 Reasonable adjustments are specifically to support you at work.
- 1.2 Reasonable adjustments can vary significantly, dependent upon your disability, role and working environment. They may include physical aids or equipment, training/coaching, or changes to behaviours or practice.
- 1.3 The adjustments are not to be used for those with caring responsibilities, including the care of those with disabilities; there are other [welfare and support options](#) that cater for carers.
- 1.4 Some factors that may be considered in reaching this decision include:
- Practicality and affordability
 - Any impact on wider team or operational effectiveness
 - Whether the adjustment could harm the Health and Safety (H&S) of others
 - The extent to which a specific adjustment would achieve its purpose to reduce the disadvantage being faced
- 1.5 The adjustment may not be reasonable if:
- It has a disproportionate cost i.e. an excessive financial burden compared to the size and resources of the organisation
 - It is impractical i.e. technologically incompatible or would significantly disrupt operations
 - It presents risks to H&S
 - It has an effect on operational effectiveness, but a clear rationale and explanation must be provided
 - There is no substantial disadvantage compared to others
 - Alternative solutions/reasonable measures are already in place
 - WMP are not aware of your disability or the need for adjustments
- 1.6 A Reasonable Adjustment Passport (RAP) is used to document any discussion/ agree adjustments (see section 5).

2. SCOPE OF REASONABLE ADJUSTMENTS

- 2.1 Reasonable adjustments can take many forms:
- These can include the provision of specific equipment or hardware (e.g. a specialist chair; a laptop with specific software on; a portable or fixed loop system, etc).
 - It can also be other forms of support, such as the provision of a British Sign Language (BSL) interpreter or a support worker.



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2.2 While in some cases, reasonable adjustments can include changes to your working hours, agility, or duties, these must be discussed with the local Human Resources (HR) team and, where appropriate, involve advice from Occupational Health. A RAP cannot be used to enforce these changes as it is likely that other workforce-level applications (e.g. Flexible Working Agreement) will be required.

2.3 Temporary injury or illness

2.3.1 If you are returning to work following an injury and require some temporary transitional arrangements, these are not reasonable adjustments.

2.3.2 Temporary accommodations can be agreed within your Return to Work Wellbeing Plan or as a 'Check in' on your [REDACTED] record. Please refer to the [Recuperative and Adjusted Duties Policy](#).

2.3.3 Your LM must contact the H&S team or seek further advice from local HR.

2.4 Environmental changes

2.5.1 Unless related to a disability or condition, workplace environment issues (e.g. room temperature, noise and/or lighting preferences), do not sit under this policy and should be resolved by your LM.

2.5.2 Where the needs fall under the [Equality Act 2010](#), any agreed adjustments (e.g. access to a desk fan or window desk) should be recorded on your RAP and follow the process outlined in Figure 2.

2.5 Change in working hours

2.5.1 In some circumstances, it may be appropriate to use reasonable adjustments in conjunction with a flexible-working agreement, however, under no circumstances should RAPs be used in place of a flexible-working agreement.

2.5.2 Any changes to working patterns/hours need to be formally requested through the flexible-working application process so your working hours/pattern is agreed and recorded centrally. As outlined within the [Flexible Working Policy](#), an application is required even if you are requesting an amendment to your work pattern which does not reduce your working hours.

2.5.3 If related to a disability, long-term health condition or neurodivergence, a RAP may be appropriate for minor, short-term changes to working hours. For example, if you are undergoing a change in medication and require some short-term flexibility while you adjust to the new regime. However, if it is not a short-term issue, or the requested change is significant and has a wider impact on others, [recuperative and adjusted duties](#) or a [flexible working](#) agreement is likely to be more appropriate.



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- 2.5.4 If you have caring responsibilities and are facing difficulties, which may be having an impact on your health, it is recommended that you speak to your LM in the first instance.

2.6 Agile working

- 2.6.1 Any discussion regarding agile working should be in line with the [Agile Working Policy](#).
- 2.6.2 In cases where it has been agreed that you can work from home on days that you are symptomatic, this will be regularly reviewed. This adjustment will only be appropriate for those with certain disabilities or conditions and in certain roles, dependent upon the fundamental purpose of the role, type of work undertaken, equipment/systems required etc.
- 2.6.3 On days that you request to work from home as a result of this agreement, this should involve a conversation with your LM who will consider whether it is appropriate. The adjustment must not be used to mask sickness.
- 2.6.4 WMP encourage you to consider alternative adjustments or behavioural changes that could achieve the same outcome. These may include regular screen breaks, additional time to complete administrative tasks, or support via Occupational Health or Wellbeing. The [Stress Risk Assessment](#) may also assist LMs with identifying other suitable alternatives.

2.7 Specialist software

- 2.7.1 Requests for specialist equipment or software should be raised with IT as there may be compatibility or security issues to be considered. In order to request any specialist software as a reasonable adjustment, you must complete a RAP (refer to Figure 2) which outlines why the software would assist you within your role.
- 2.7.2 Individuals will be expected to have trialled Microsoft 365 for a minimum of three months before being provided with additional software. Guidance and resources to unlock the full functionality of Microsoft 365 can be found through the [IT&D site](#).
- 2.7.3 In cases where Microsoft 365 does not meet your needs, a request for specialist software should be submitted to the [Reasonable Adjustment Officer](#) alongside your RAP.
- 2.7.4 Due to security and compatibility issues, advice may be needed from Access to Work or IT specialists before changes can be agreed and implemented.

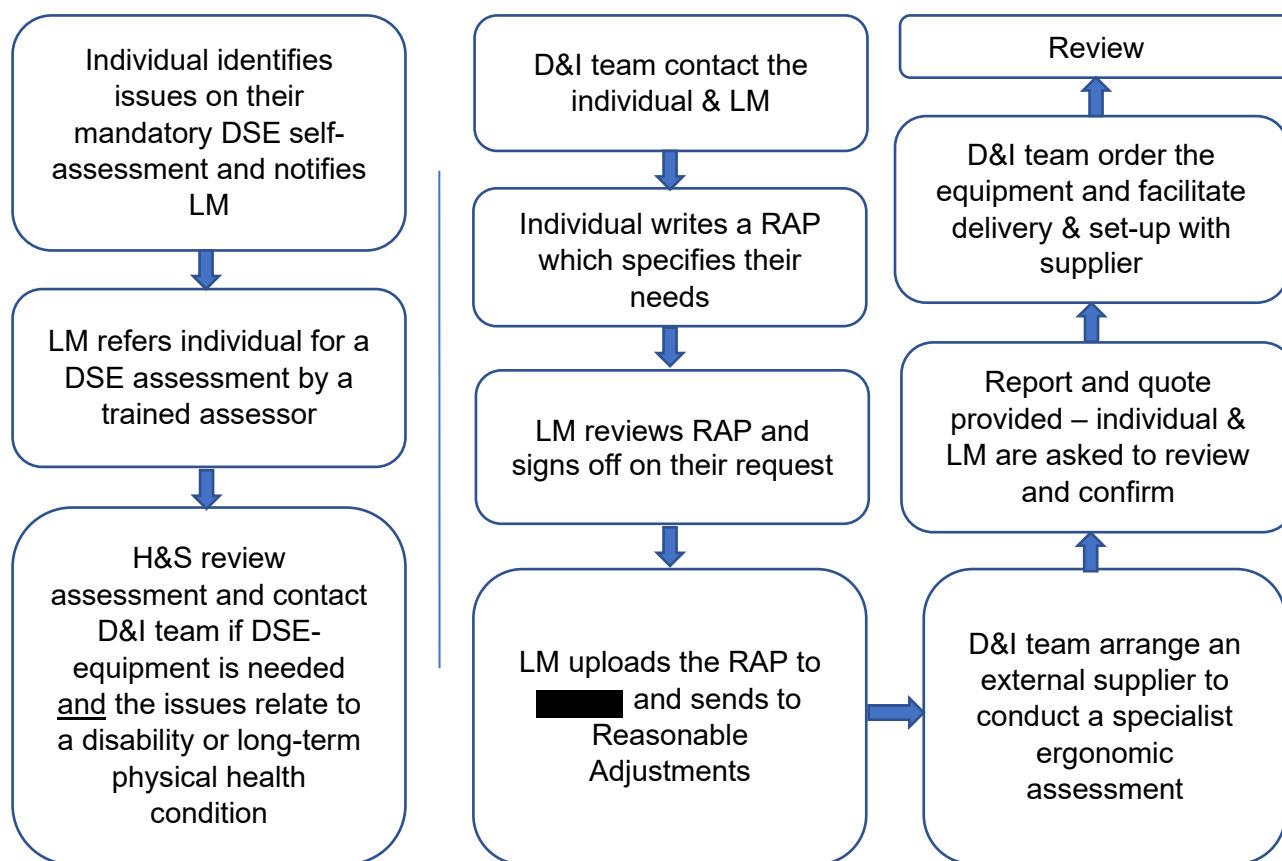
2.8 Display Screen Equipment (DSE)

- 2.8.1 As per [H&S guidance](#), all Display Screen Equipment (DSE) users should have completed the mandatory DSE Self-Assessment.
- 2.8.2 H&S are the point of contact for DSE for temporary health concerns not covered within the [Equality Act 2010](#). H&S will liaise directly with the Diversity & Inclusion Team (D&I) if your DSE Assessment indicates an underlying disability or condition that requires reasonable adjustments.

- 2.8.3 If you identify DSE issues when completing your self-assessment, you must notify your LM who will arrange a full DSE Assessment with a trained DSE Assessor. When complete, this assessment will be sent to the H&S team for review.
- 2.8.4 In cases where the DSE issues relate to a condition under the Equality Act (i.e. 'substantial and long-term'), you are entitled to reasonable adjustments. The process outlined in Figure 1 should be followed to request equipment through the Reasonable Adjustment Officer.
- 2.8.5 Approval must be sought from Facilities before any larger items (e.g. desks/chairs) are purchased to ensure that they can be properly integration into the workspace.
- 2.8.6 In line with the [Agile Working Policy](#), where agility is not a requirement of your role, any specialist equipment that has been purchased to assist you within the workplace, will not be duplicated for you to work from home.

3. DSE RELATED ADJUSTMENTS PROCESS

3.1 **Figure 1:** Process for DSE-related adjustments

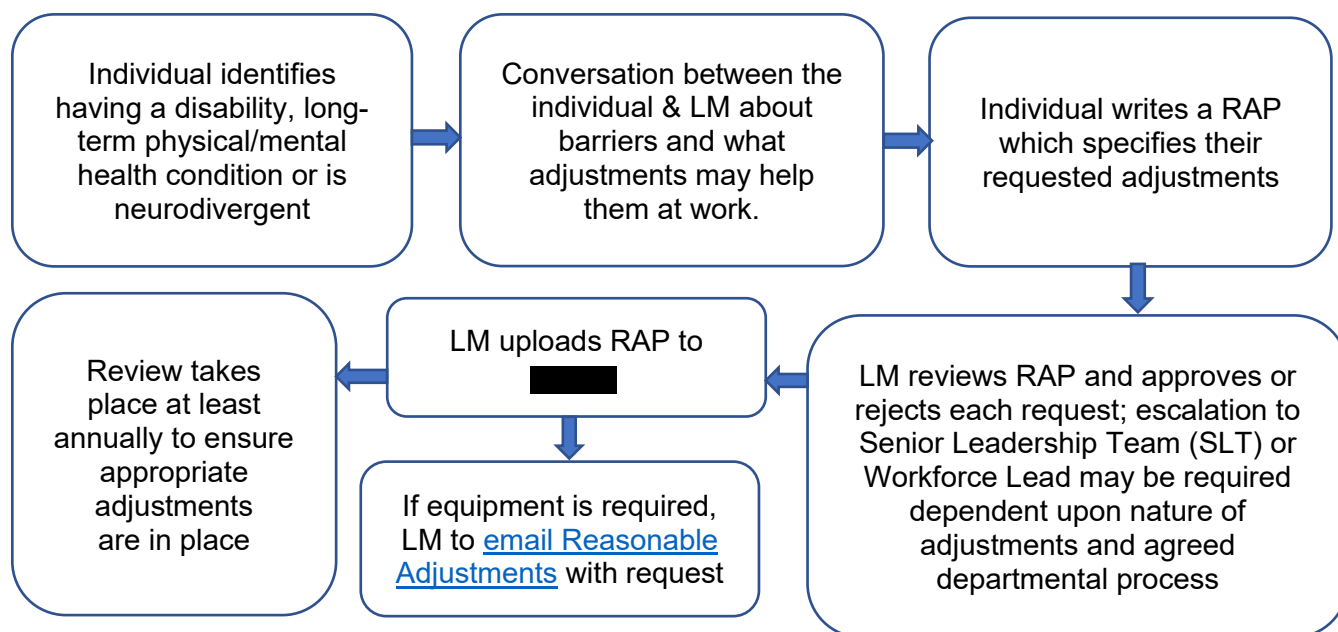


- 3.2 DSE related concerns should follow the standard WMP process as outlined within [\(H&S\) requirements](#)
- 3.3 If specifically advised by Occupational Health, an ergonomic assessment can be requested without the full DSE Assessment undertaken by the H&S-trained assessor.

4. REASONABLE ADJUSTMENT PROCESS

4.1 If you may require a reasonable adjustment, you should discuss this with your LM and follow the process in Figure 2. Throughout this process, [support](#) is available from a range of sources if needed.

4.2 Figure 2: Reasonable Adjustment Process



4.3 Any agreed environmental or behavioural changes should be implemented by your LM.

4.4 A RAP should be reviewed and resubmitted every twelve months or after new adjustments have been agreed, or in the event of any changes in circumstance (e.g. role/shift/line management/etc).

4.5 There may be some occasions where it is not possible to accommodate requested adjustments within a current role. In these cases, WMP may suggest alternative adjustments, or if absolutely necessary, consider medical redeployment for Police Staff or a suitable alternative posting for Police Officers.

4.6 For DSE related adjustment requests, please refer to the process flowchart - Figure 1.

5. REASONABLE ADJUSTMENT PASSPORTS (RAP)

5.1 The purpose of a [RAP](#) is to:

- Ensure that you and your LM, including initial training manager for new recruits, have a conversation and accurately record any agreed adjustments and how they will be implemented
- Provide consistency around your reasonable adjustments when changing roles/post, relocate, or have a new manager

- Proactively identify whether your requested reasonable adjustment will impact upon others within the workplace/team and agree how you would like this to be managed or communicated to your colleagues
- Substantiate any requests for reasonable adjustment equipment
- Have a basis from which to conduct RAP reviews.

4.7 Any reasonable adjustments should be recorded as per the process - Figure 2

4.8 RAPs are not flexible-working agreements.

4.9 The RAP form can be used as a corporate record of your discussion with LMs regarding your disability, physical or mental health conditions and/or neurodivergence, even if you do not require any specific adjustments.

4.10 You do not need a RAP if you are returning to work following a period of sickness. However, a period or pattern of absence may signal that there is an underlying condition; LMs should ask relevant questions as part of the [Return to Work process](#) so that appropriate support/adjustments can be identified.

4.11 A RAP is treated as sensitive; it will not be shared with other colleagues without your permission. However, the document may be seen by the D&I Manager, D&I Coordinator and/or Reasonable Adjustment Officer to ensure they are being used correctly and to assist with implementing agreed adjustments (e.g. the purchase of equipment or installation of software).

4.12 Your RAP will be accessible to any new LM that is aligned to you on [REDACTED].

5. WRITING A RAP

5.1 The content of a RAP is highly dependent on the individual. Below are some considerations that may be appropriate to include:

- Equipment - (e.g. specialist keyboard/mouse/footrests/etc.); Standard keyboards, mice, footrests, gel mouse or keyboard support mats and laptop risers are standard WMP equipment that can be requested via [MyServicePortal](#) without a RAP in place.
- Documents (e.g. specific print/format/colour/size);
- Workplace/office adjustments and facilities (e.g. kitchen/toilet/space/etc.)
- Parking/commute issues;
- Vertical/ horizontal movements (e.g. stairs/lifts/lifting/carrying/moving)
- Medication that may be having an impact on you within the workplace;
- A Personal Emergency Evacuation Plan if required;
- Any concerns about communication and working relationships;
- Reference to working hours or arrangements already in place, or in the process of being requested, via a Flexible Working Application;
- Whether you wish to make other colleagues aware of your condition
- Any other relevant obstacles or concerns.



5.2 Open RAPs

- 5.2.1 WMP have an optional [Open Reasonable Adjustments Passport](#) which can be completed alongside the RAP. An Open RAP does not replace the need for a full RAP to be completed and uploaded to [REDACTED].
- 5.2.2 The Open RAP contains the adjustments agreed between you and your LM without any additional sensitive information. This allows you to share adjustments within your RAP with people who need to know, such as a temporary supervisor, without having to disclose more personal information.
- 5.2.3 Open RAPs should still be treated confidentially and must not be shared without your consent.

5.3 RAP Review

- 5.3.1 Your needs and adjustments are likely to change and/or organisational changes may also necessitate a review (e.g. following health deterioration/improvement, advances in IT, organisational/policy changes, etc).
- 5.3.2 Your RAP can be reviewed and changed following a discussion with your LM; it should be seen as a living document.
- 5.3.3 RAPs may be reviewed at more regular intervals than the twelve-monthly review if they are newly implemented or the condition is complex/dynamic.
- 5.3.4 All reviews should be formally recorded by uploading the reviewed RAP form – including review date and signature – to [REDACTED].

5.4 Change in management

- 5.4.1 You should check that your new manager is aware that you have an existing RAP on [REDACTED] and what adjustments have been agreed by their predecessor.
- 5.4.2 Where appropriate and reasonable, your new LM should accept the workplace adjustments outlined in your existing RAP and continue to ensure they are implemented.
- 5.4.3 Your RAP may need to be reviewed and amended at a later date, however unless there are exceptional circumstances, this should only happen once you have worked with your new LM for a period of time.

5.5 Change in role

- 5.5.1 When moving to a new role, especially when the role is significantly different to your previous position, your RAP may need to be reviewed.



- 5.5.2 The decision on whether an adjustment is reasonable includes considerations around its practicality and impact on the wider team or operational effectiveness. In particular, if your previously agreed adjustments relate to ways of working or working patterns, these may need to be reviewed in light of your new role and working environment.

6. REASONABLE ADJUSTMENT ESCALATION

- 6.1 In cases where your requested adjustments may have a wider impact on your team or department, or an agreement cannot be reached, your LM should escalate the matter to your local SLT or HR Advisor.
- 6.2 Where adjustments are refused, this should be based on an objective decision in line with the [Equality Act 2010](#). Before rejecting a requested adjustment, LMs are encouraged to discuss their rationale with local HR to promote consistency and fairness across departments.
- 6.3 If disagreements cannot be agreed at a local level, concerns around an adjustment can be escalated by HR to the Reasonable Adjustment Passport Panel (RAPP) to resolve.
- 6.4 If escalated to SLT, HR or RAPP, only minimal details will be disclosed (i.e. the proposed/requested adjustments).

7. REASONABLE ADJUSTMENT PANEL (RAPP)

- 7.1 The RAPP meets monthly and acts as the final decision-making body in relation to reasonable adjustments.
- 7.2 It is chaired by a Superintendent, or equivalent staff role, and has representation from Workforce Governance, HR, Employee Relations, D&I and Occupational Health. If appropriate, Unite the Union, Unison, or the Police Federation.
- 7.3 The panel ensures force level oversight and consistency of decision-making. It also seeks to minimise the need for adjustments by understanding patterns and identifying opportunities to improve the way WMP work.

8. REASONABLE ADJUSTMENT EQUIPMENT

- 8.1 Action to provide an agreed adjustment(s) will be taken as soon as reasonably practicable.
- 8.2 You must take personal responsibility for keeping safe any reasonable adjustment equipment assigned to you. If equipment is broken or misplaced, you may be expected to bear the cost of replacement – please contact the Reasonable Adjustment Officer for advice.
- 8.3 If you no longer require the item or are leaving WMP, you are expected to return equipment to the D&I Team.



9. NEURODIVERGENCE

- 9.1 WMP strive to create processes and a culture in which neurodivergent individuals are empowered to share their needs, maximize their potential and achieve great things within the organisation.
- 9.2 As a result of its long-term impact on day-to-day activities, neurodivergence can fall under the legal definition of 'disability' within the [Equality Act 2010](#) and therefore neurodivergent individuals may be entitled to reasonable adjustments. In these cases, the process outlined in Fig.1 should be followed.
- 9.3 You do not need a formal diagnosis of neurodivergence to receive reasonable adjustments. However, WMP do have an in-house network of workplace assessors who can make recommendations on what reasonable adjustments may be appropriate.
- 9.4 WMP offer Dyslexia workplace assessments. Any assessment requests should be directed to your local HR team. Obtaining an assessment does not exempt you from having to follow the process outlined in Fig.1 to request the recommended adjustments.
- 9.5 For advice or guidance on what reasonable adjustments may support you or someone in your workplace who may be neurodivergent. WMP encourage you to engage with the [D&I](#) [REDACTED] or [Neurodiversity Network](#).

10. RECRUITMENT & PROGRESSION

- 10.1 Any reasonable adjustments or accommodations for promotion, progression or lateral development will be agreed on a case-by-case basis. Please refer to the [Selection & Onboarding Policy](#) for more details.
- 10.2 **Recruitment-related reasonable adjustments**
 - 10.2.1 The Recruitment Team consider all requests for reasonable adjustments during the selection process. If appropriate, Recruitment Officers will engage with the Reasonable Adjustment Officer to ensure that any required adjustments can be put in place during the application, recruitment and/or induction process.
 - 10.2.2 Any disagreement between the candidate, Hiring Manager, or Recruitment Team regarding the provision of reasonable adjustments will be referred to the RAPP for a final decision.
 - 10.2.3 If a candidate has been successful within the recruitment process, and the RAPP have recommended that reasonable adjustments should be put in place to support their transition into the workplace, the D&I team may provide a pre-populated RAP to assist the new recruit and their LM with putting these adjustments in place at the start of their employment.
- 10.3 **Progression-related reasonable adjustments**



10.3.1 WMP aspire to 'design out' the need for adjustments within promotions by ensuring that the standard process is fair and accessible to all, included making changes to the style and format of our interviews and assessments – e.g. interview questions printed in specific formats, fonts or on colour paper.

10.3.2 WMP will still consider any individual requests for adjustments beyond the standard provision; these cases will be referred to RAPP for a final decision.

10.4 Exams

10.4.1 The College of Policing accommodate [reasonable adjustments for exams](#).

10.4.2 These can be requested by completing the College of Policing's [request form](#) and submitting it to our Force Examinations Officer alongside any supporting documentation. The Promotions Team or [Training](#) [REDACTED] can provide more detailed guidance.

11. ACCESS TO WORK

11.1 [Access to Work](#) is a government programme that provides practical and financial support to people with disabilities and/or physical or mental health conditions, with a view to helping them start or stay in work. It is used in situations where an individual needs support or adaptations beyond the workplace adjustments which an employer is legally obliged to provide under the Equality Act.

11.2 You can self-refer to Access to Work. Where appropriate, the Reasonable Adjustment Officer may also signpost you to 'Access to Work' for an assessment, further support or more specialist equipment.

11.3 You must name the Reasonable Adjustments Officer as your workplace contact for Access to Work in order to ensure that equipment can be sourced and provided without delay

11.4 Due to organisational restrictions around software and equipment, not all recommendations made by Access to Work can be provided.

11.5 Eligibility

11.5.1 To be eligible for Access to Work, you must have a disability or health condition that has a long term substantial adverse effect on your ability to carry out your job.

11.6 Support

11.6.1 Access to Work can support in several ways; including providing funds towards:

- Special aids and equipment;
- Adaptations to equipment;
- Travel to work;



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- Communication support at interviews;
- A variety of support workers;
- Training and coaching sessions.

11.6.2 Access to Work does this by completing an assessment, making suggestions for your support, and providing a grant which allows us to reimburse the cost of some or all of their recommendations.

11.7 Process

11.7.1 To request Access to Work, you must self-refer via the [Government website](#). However, you must contact the Reasonable Adjustment Officer before applying as you will need a point of contact within WMP to progress your application and the subsequent claim.

11.7.2 After applying to Access to Work and completing their assessment, you will be sent an award letter which contains any recommended adjustments and the grant amount. This should be sent to the [Reasonable Adjustment Officer](#) with a request for any of the recommended support/equipment. Please be aware that we must determine what can be provided, considering what is [reasonable](#) based on your job role and adhering to WMP policies.

11.7.3 The ability to claim for the cost of the support is time-limited, therefore it is crucial that the Reasonable Adjustment Officer is sighted on any Access to Work awards at the earliest opportunity.

12. ROLES AND RESPONSIBILITIES

12.1 Individuals

12.1.1 You are responsible for:

- Completing a RAP form following the discussion with your LM – there is advice and guidance available from local HR, Occupational Health, and the D&I team.
- Taking care of any reasonable adjustment equipment provided to you;
- Updating your LM of any relevant change to your condition or circumstances;
- If applicable, sharing your RAP with any new LMs on being moved to a different post/role/department.

12.1.2 In order to support you in the workplace and provide any necessary adjustments as soon as possible, you should share any long-term health conditions or disabilities, or as a minimum the impact of such conditions on you.

12.1.3 You must maintain a level of fitness and ability for your role and should inform the organisation in circumstances where your health condition or disability is likely to impact on your functional ability to do your job or generate a H&S risk.



12.2 Line Manager

12.2.1 Your LM is responsible for:

- Reading and understanding this policy;
- Where appropriate, identifying the need for additional support or a reasonable adjustment;
- Assisting you with identifying what adjustments may help and what is reasonable to request;
- Supporting with the completion of a RAP;
- Contacting local HR or Occupational Health for advice if needed;
- Uploading your RAP to [REDACTED];
- Raising any requests for equipment to the [Reasonable Adjustment inbox](#);
- Conducting RAP reviews with you at least annually and making amendments where appropriate.

12.3 Reasonable Adjustments Officer

12.3.1 The Reasonable Adjustments Officer is responsible for:

- Ordering any agreed equipment, software, or training;
- Raising any requests for specialist equipment or software with IT in case of any compatibility or security issues;
- Acting as the organisation's point of contact for Access to Work claims;
- Storing a secure copy of your RAP;

12.4 Other Support

12.4.1 If any additional assistance or advice is required, please contact:

- Local HR team
- Reasonable Adjustment Officer (D&I Department)
- Unite the Union, Unison, Police Federation or Superintendents Association
- WMP Staff Networks



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Accommodation	Accommodation covers adjustments made for individuals with a condition that is not recognised by the Equality Act 2010 as a 'disability'. This could encompass a short-term condition or one that does not have a substantial effect on your day-to-day activities. This will be managed in line with the Recuperative and Adjusted Duties Policy
Disability	A disability is defined as a 'physical or mental impairment' which 'has a substantial and long-term adverse effect' on a person's 'ability to carry out normal day-to-day activities'. This is defined within the Equality Act 2010 Additionally, there are conditions that are automatically protected under disability discrimination law from the point of diagnosis: • Cancer; • HIV infection; • Multiple sclerosis; • Visual impairment (whether certified blind, sight impaired or partially sighted); • Progressive conditions (as they are likely to have a substantial impact in the future even if the effect is not immediate). WMP recognise that you may have a physical and/or mental health condition but not view yourself as being 'disabled'. We have specifically used the term 'disability' in this policy to align with the language and requirements within the Equality Act.
Disability Discrimination	Discrimination is the less favourable treatment because of, or for a reason related to, a person's disability or a failure to make a reasonable adjustment. The Equality Act 2010 also includes protection from discrimination by association and discrimination by perception.
Reasonable Adjustment Passport (RAP)	A document which outlines how your disability, long-term health condition and/or neurodiversity can impact you at work, allowing for any reasonable workplace adjustments to be agreed and amended as circumstances or conditions change.
Reasonable Adjustment Passport Panel (RAPP)	The Panel ensures force level oversight and consistency of decision-making. It also seeks to minimise the need for adjustments by understanding patterns and identifying opportunities to improve the way WMP work. Where there is a dispute over reasonable adjustments that cannot be resolved at a local level, this Panel acts as the final decision-making body.
Reasonable Adjustments	The Equality Act 2010 places a duty on employers to make changes to ensure disabled employees are not substantially disadvantaged. Adjustments can include changes to working practices, aides or equipment, additional workplace training or coaching.
Neurodivergence	Neurodivergence refers to an individual's variations in brain functioning and processing that differ from the typical range and includes conditions such as Autism, ADHD, Dyscalculia, Dyslexia, Tourette's, which may impact on how they think, behave, and learn. Individuals whose brain functions and processes differently from a typical person are described as neurodivergent. Under the Equality Act 2010, neurodivergent conditions may amount to a disability if they have a substantial effect on your ability to carry out normal day-to-day activities.
Neurodiversity	Neurodiversity refers to the variety in types and spectrums of brain function and processing within the population.



Relevant Legislation / Policies / Procedural Guidance

Legislation:

- [Equality Act 2010](#)
- [College of Policing Workplace Adjustment Toolkit](#)

WMP Policy:

- [Agile Working Policy](#)
- [Attendance Management Policy](#)
- [Capability \(Police Staff\) Policy](#)
- [Dispute Resolution Policy](#)
- [Flexible Working Policy](#)
- [Permanent Disablement and/or Ill Health Retirement for Police Officers Policy](#)
- [Probation Period \(Police Staff\) Policy](#)
- [Recuperative and Adjusted Duties Policy](#)
- [Regulation 12 & 13 Probation \(Police Officer\)](#)
- [Selection & Onboarding Policy](#)

Equality Impact Assessment

WMP places trust in their employees to comply with force policies and to work in accordance with and in support of:

- [WMP Vision and Values](#)
- [Code of Ethics | College of Policing](#)
- [Voice of the Child](#)

	What impact has this policy had on the nine protected characteristics in relation to the three general duties? (If applicable)	How will this updated policy positively impact each of the nine protected characteristics in relation to the three general duties? If not, explain why it will not.
Age (including children and young persons)	No impact identified within the 2018 Workplace Adjustments Policy; it stated: 'all colleagues respected and treated fairly' regardless of age.	This policy sets out a clear process around reasonable adjustments, encouraging a consistent approach across WMP. The policy also allows for consideration of individual circumstances to ensure appropriate adjustments are put in place. Research shows that as the general population ages, the number of those living with a disability is increasing. WMP recognise that as officers and staff within our Force age, there are a number of age-related conditions and disabilities that may affect them. Occupational Health Advisors, DSE Assessors (and our external ergonomic assessment providers where appropriate), ensure that we



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		have the advice needed to put effective adjustments in place. Officers with disabilities or long-term conditions are more likely to require recuperative or adjusted duties; reasonable adjustments can be used alongside the Recuperative and Adjusted Duties Policy to cater for these needs. There is also a rise in the identification of some neurodivergent conditions in young people. As a Force with an increasing number of individuals under 30 years old, it is positive that this policy specifically encourages the use of reasonable adjustments to support and maximise the potential of neurodivergent individuals. WMP have also seen an increase in late diagnoses in older individuals. The introduction of a broader work-based assessment offer will enable us to help these individuals navigate their diagnosis and suggest practical workplace adjustments. WMP do not require a formal diagnosis of neurodivergence for an individual to obtain reasonable adjustments – this creates an inclusive approach in which older staff/officers can still access support despite being less likely to have received a diagnosis (e.g. during their education).
Disability	The 2018 Workplace Adjustments Policy recognised that individuals with long-term health conditions and disabilities may be placed at a greater disadvantage by certain workplace arrangements. It took steps to remove this disadvantage and meet the needs of people with disabilities across the organisation. The 2018 Policy Equality Assessment raised the need for “flexibility of approach in relation to location (for instance agile working) and times of work (i.e. changes to shift).	This policy supports and enables those with disabilities to access work effectively and have the tools needed to thrive. This policy recognises that individuals with long-term health conditions, disabilities <i>or neurodivergence</i> may be placed at a greater disadvantage by certain workplace arrangements or standard equipment. Consequently, its procedural guidance outlines a clear process to ensure that reasonable adjustments are put in place and regularly reviewed to ensure they are effectively enabling the individual.

	patterns or rotas)” in order to support colleagues with disabilities. However, encouraging shift changes and agile working to be agreed between an individual and their line management within a RAP had an unintended negative impact on workforce, attendance, and performance issues. The new policy recognises that at times it may be appropriate for reasonable adjustments to be used alongside flexible working agreements, but they should be distinct and do not negate the need for formalised working arrangements to be agreed at a Department level. The new Agile Working Policy and updated Flexible Working Policy ensure that these concerns are still addressed.	Some individuals may be placed at a disadvantage by the physical features of the premises where they work (e.g. their work station, space issues, etc.) – the D&I team, Facilities and local HR advisors can provide advice and assist managers with developing an appropriate solution for the individual. As reasonable adjustments are decided between an individual and their LM, there is a risk of disparity across the Force dependant on a manager’s own views or perceptions about certain disabilities and what is reasonable. This will be mitigated by all RAPs being submitted to the Reasonable Adjustment Officer for dip-sampling and quality assurance. The introduction of the RAPP also creates an independent decision-making body to assist where needed. The cost of some adjustments may mean that individuals are directed to go through Access to Work and obtain a grant for the support. The current Access to Work wait times could delay their support and have an impact on their ability to engage meaningfully with – or even attend – work. This will require managers, in conjunction with Local HR and the D&I team, to consider what alternative reasonable adjustments can be put in place in the interim while their application is being assessed.
Gender Reassignment	No impact identified within 2018 Workplace Adjustments Policy.	Research suggests transgender and non-binary people are more likely to experience long-term health conditions, learning difficulties and/or neurodivergent conditions than the general population. This policy allows for consideration of individual circumstances to ensure appropriate adjustments are put in place.
Pregnancy & Maternity	The 2018 Workplace Adjustments Policy recognised that reasonable adjustments may be required to support pregnant colleagues or those on maternity leave. It highlighted the importance of LMs keeping in touch,	A likely impact related to this characteristic is the frequent need for DSE-related equipment as a result of pregnancy/maternity-related back pain or other physical issues prior to or following childbirth and breastfeeding. This policy highlights the joined-up



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	discussing needs and making welfare support available to the individual.	approach between the D&I team and H&S to ensure these concerns are dealt with and any appropriate changes to the workplace can be supported. It is also recognised that the scope of this policy is more restrictive than previous and does not encompass the use of reasonable adjustments for caring responsibilities, including the care of those who have disabilities. This may have a disproportionate impact on primary caregivers within the organisation. However, the new Agile Working Policy and updated Flexible Working Policy ensure that these concerns are addressed and changes to working patterns are more effectively recorded and recognised at a Department/Force level. Line management have a key role to play in recognising the caring responsibilities of their officers/staff, putting necessary support in place, and seeking Local HR advice where needed.
Marriage & Civil Partnership	No adverse impact identified within 2018 Workplace Adjustments Policy.	No impact identified.
Race	No impact identified within 2018 Workplace Adjustments Policy. However, it recognised that there is disproportionality within minority communities, including often being those who experience the worst health outcomes.	As documented within the 2018 Equality Assessment, WMP recognise national themes of disproportionality and adverse effects on people from minority communities. WMP is committed to horizon-scanning for emerging themes across all protected characteristics and will help to address, mitigate or ameliorate where possible. The introduction of the RAPP –with representation from Workforce Governance, HR, Employee Relations, D&I and Occupational Health – to act as the final decision-making body within the reasonable adjustments process, ensures that outcomes are objective, accountable and engage key stakeholders to give critical advice.
Religion or Belief	No adverse impact identified within 2018 Workplace Adjustments Policy.	No impact identified.
Sex	No adverse impact identified within 2018 Workplace Adjustments Policy. However, it recognised that gender	As documented within the 2018 Equality Assessment, WMP recognise



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	inequality underpins many problems which disproportionately affect women and girls, including but not limited to inadequate healthcare.	national themes of disproportionality and adverse effects on people from minority communities. WMP is committed to horizon-scanning for emerging themes across all protected characteristics and will help to address, mitigate or ameliorate where possible. It is acknowledged that the effects of Menopause and related conditions can fall under the Equality Act – this policy adopts a wide definition of disability to ensure that officers and staff are able to access reasonable adjustments where needed. Some disabilities or long-term health conditions are less common and can be misunderstood; research suggests this is the case for some conditions that are specific to one sex (e.g. gynaecological conditions). However, as identified within this policy, WMP seeks specialist advice from both Occupational Health and our external suppliers (for ergonomic assessments) in order to put the right reasonable adjustments in place for an individual's specific needs.
Sexual Orientation	No adverse impact identified within 2018 Workplace Adjustments Policy.	This policy allows for consideration of individual circumstances to ensure appropriate adjustments are put in place. Evidence suggests there are higher rates of mental ill health within the LGBTQ+ population in comparison to the heterosexual population. This may be due to adverse experiences such as discrimination, homophobia, rejection, and fears of being 'outed'. The introduction of the 'Open' RAP ensures individuals are not forced to reveal personal information or sensitive reasons why they may have certain adjustments in place.

Publication Instructions

Suitable for publication to public.



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Document Control

Strategic Lead:	██████████ (Employee Relations Strategic Lead)
Policy Author(s):	██████████ (D&I Coordinator)
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FET Lead:	Peter Gillett (Director of People and Commercial Services)
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Review Date:	19 th March 2029

Any enquiries in relation to this policy should be made directly with the Strategic Lead.

All policies are subject to a formal consultation process which encompasses Legal, Professional Standards, Faith Groups, Trade Unions, Independent Advisory Groups and wider force groups and any other relevant parties. A record of consultation can be found on the Policy Portal.

It is responsibility of the Strategic Lead to ensure that all links within the policy are correct and accessible.

Amendment History:

Version Number:	Effective Date:	Summary of Amendments:	Author:
2.0		Full review of Workplace Adjustments policy and renamed to Reasonable adjustments	██████████