

Reasonable Adjustments

38. DWP has a legal duty under the Equality Act to make reasonable adjustments in all the following circumstances:

- Where a disabled person is at a substantial disadvantage in relation to a relevant matter in comparison with a non-disabled person we must remove or alter what we do to avoid the disadvantage. This could be a certain practice or physical feature.
- Where, but for the provision of an auxiliary (supporting) aid, a disabled person would be put at a substantial disadvantage in relation to a relevant matter in comparison with a non-disabled person we take reasonable steps to provide the auxiliary aid or service.
- Where the adjustment relates to the provision of information, .i.e. letters and correspondence, then this should be provided in an accessible format. For example this could be large print, braille, audio. It could also include the contents being read to the customer by a friend, representative or a member of staff.

39. The duty to make reasonable adjustments is **anticipatory**: we must not wait until a disabled person wants to use our services before we consider the type of reasonable adjustments needed. We must anticipate the requirements of disabled people and the adjustments that may have to be made for them.

40. Every time that there is customer contact by phone, online or in writing, staff must actively seek to find out if the customer needs additional support or a reasonable adjustment.

41. What is a reasonable adjustment depends on the circumstances of the case and will be specific to the needs of the disabled customer. DWP considers the type of service being provided; our size and resources; and the effect of the disability on the individual disabled person. A variety of reasonable adjustments is available to offer to customers. See list below.

42. A reasonable adjustment can be put in place on a temporary, short term or long term basis. For example, there may be a temporary situation affecting the symptoms of the disability so the customers requires support now to enable them to access benefits and services but may not require this support when their circumstances change.

43. Remember: you must record the reasonable adjustment so other colleagues engaging with this customer will know what to do. This will help to provide consistent service delivery and stop the customer having to repeat their request. If the customer has to tell us twice, we may have failed in our duty.

44. The requirement for a reasonable adjustment should be regularly reviewed to ensure it continues to meet the needs of the customer and is in line with the current range of support offered by DWP.

45. Please note that in all cases the Equality Act prohibits us from requiring customers to pay to any extent the costs of making any adjustments.

Auxiliary Aids and Services

46. DWP must take reasonable steps to provide auxiliary aids or services to ensure disabled customers are not disadvantaged in the level of service they receive. Exactly what DWP should provide is based on the individual customer and disability concerned.

Overcoming Barriers Created By Physical Features

47. The Equality Act requires DWP to ensure that disabled people can access all the services they provide. A provider cannot offer a lesser standard of service to a disabled person simply because of unsuitable premises. Where a physical feature puts disabled customers at a substantial disadvantage when using DWP services, reasonable steps must be taken to:

- Remove the feature;
- Alter it; or
- Provide a reasonable means of avoiding it.

48. This means DWP must give consideration to our premises in terms of the way they are accessed and organised. Where it is not possible for a customer to access the full range of services on the usual premises, then DWP must take reasonable steps to devise alternative ways to provide the same range and quality of service. DWP cannot delegate its Equality duty to the organisations we work with.

49. The providers/partner organisations that DWP work with must give consideration to their premises in terms of the way they are accessed and organised. Where it is not possible for a customer to access the full range of services on the usual premises, then the provider/partner organisation must take reasonable steps to devise alternative ways to provide the same range and quality of service and comply with the Equality Act.

List of DWP Reasonable Adjustments

50. The list below covers the range of support available. If a customer requests a reasonable adjustment that is not listed here, contact the DWP Equality Team Social Justice

51. If a customer requests a specific Reasonable Adjustment, is recommended that staff consider if you can give a better service by providing a different reasonable adjustment. It is recommended staff discuss the options available with the customer so consideration can be given to providing the most appropriate way of enabling the customer to access benefits and use our services

Audio/CD format: Providing Information in Audio/CD Format

52. If a claimant/customer requests communications/correspondence in audio format firstly consider if you can provide better service by giving the information in a different way, for example over the telephone.

53. If you do need to order audio formats/CDs, follow the communications support services guidance.

54. Staff should also be aware that interviews can be recorded where it is requested by a disabled claimant/customer as a reasonable adjustment. Refer to the Recordings by claimants during interviews, telephone calls etc. guidance.

Audio Recording of Interview

55. Staff should also be aware that interviews can be recorded where it is a “reasonable adjustment” requirement under the Equality Act 2010. If necessary speak to your local Disability Equality Adviser who can facilitate this. See the Recording of interviews by claimant’s guidance for more information.

Braille: Providing Information in Braille

56. If a claimant/customer requests communications/correspondence in Braille consider first if you could give better service by providing the information in other ways, for example by telephone. This will not be appropriate where a written notification has to be provided by law, for example, when regulations require this.

57. If you are not able to provide the information in an alternative way refer to the communications support services guidance for advice on how to get documents for claimants/customers in Braille. Local arrangements may be in place to get documents in Braille.

58. It is important that we provide braille consistently with the with customers. Therefore the IT systems need to be recorded and noted to reflect this so staff know any manual letters need to be provided in braille. Also system generated letters need to be taken into account.

59. In order to provide system generated letters in braille you should agree with the customer and obtain consent that all notifications will be sent to the local office by using a care of address. This does not have to be a Jobcentre, it will depend on the benefits the customer receives. If its more appropriate for the contact to be in a Benefit Centre then that should be used. Equally, it might be appropriate for a Pension Centre to hold the care of address or the DLA Alternative format team. All notifications, including letters for other benefits, if applicable, will come to that care of address, they will also need to be actioned and braille provided.

60. We need the customer to agree to a correspondence care of address being applied to their records as this could potentially lead to correspondence from Other Government Departments being diverted to the DWP office. This is because information on the changed address will be broadcast to CIS and from there broadcast to other DWP and OGD systems. We need to make sure the customer is fully informed, explaining the workaround and any potential impacts.

61. **Please have a verbal conversation** with the customer clearly explaining this using the consent wording below * (this can be done by telephone and then note up/ record this has happened on their benefit account)

****Consent wording for use of care of address:***

62. DWP can correspond with you by braille as a reasonable adjustment under the Equality Act. This requires a workaround to intercept the standard format DWP's system generated letters regarding your benefit. We need to inform you that in order to provide system generated letters in braille that all letters will be sent to the local office by using a care of address. DWP officials will then arrange for your letter to be sent to you by braille as your alternative format. Due to computer systems broadcasting information with other Government Departments, using a care of address could potentially lead to correspondence from Other Government Departments being diverted to the DWP office. DWP can proceed with your request, please provide confirmation that you agree to DWP using a care of address to send your letters to you braille.

63. If system generated letters need to be intercepted for a customer, using a care of address with a named contact on the correspondence address, please note it as Private and Confidential. Also place a note on the case in notepad and contact history explaining that "All post to this customer must be supplied in braille and the correspondence address has been set, please do not remove it. Do not delete this note, please contact (named contact and number) if you have any questions"

64. Please remember that anything in the correspondence which is time-bound or with a deadline needs to take account of the potential delay for undertaking this procedure so explain to the customer there may be a slight time delay with this process. Extend any relevant response times/ deadline dates accordingly.

65. **Please note:** It is very important for staff to be careful when sending out the braille letters to customers to ensure they stay intact. The braille letters must be protected from any damage as they may become unreadable to the customer. Please do not fold braille letters in half, they must be sent out to the customer in a protective envelope. Please use local arrangements to ensure this happens.

British Sign Language (BSL) Interpreting

66. DWP has a responsibility to provide interpreters for claimants/customers who are deaf, hard of hearing or speech impaired. See the British Sign Language interpreting guidance. The Interpreting Services guidance also addresses other non-spoken languages where communicator support is required.

Car parking facilities

67. If a customer has to travel by car because of mobility issues, consider the car parking facilities at your office and if possible arrange a parking space for the customer. If there is no car parking facilities then consider an alternative way to enable them to access benefits and services

Changing the time and date of meetings and interviews

68. Consider whether the customer and the delivery of our services can be supported by

- changing the date and time of a meeting or interview.
- Increasing the length (time spent) in the interview

69. If claimants/customers are unable to access, or travel to, DWP or partner premises we will provide alternative interview arrangements: for example, by telephone, at home or at another accessible location.

Changing location of interview

70. To make reasonable adjustments for customers with mobility needs the office environment and other accessibility issues must be considered. For example:

- If the interview is to take place upstairs, is there a lift available?
- Can you arrange to interview on the ground floor?
- Can you arrange the interview at another suitable office?
- Is there suitably trained staff available to carry out an emergency evacuation if required?

Easy Read Format

71. Easy Read is an alternative format which gives people with learning difficulties access to the same information as everyone else. It uses simple language and images to make information easier to understand.

72. Easy Read is not normally appropriate for general communications, for example a letter regarding a claimant's benefit but more appropriate for planned documents such as leaflets and signage. Remember: DWP aims to make all its communications plain, clear and easy to understand.

73. If a claimant/customer requests communications/correspondence in Easy Read as a reasonable adjustment, consider if you can provide better customer service by using other means; for example, by telephone, face to face interview or the use of an intermediary (including family/friends). You should also take into account the information that has been requested in Easy Read as not all information is suitable for Easy Read format.

74. Refer to the Public Information Team for advice on Easy Read.

75. Business Disability Forum briefing papers give practical disability related guidance for employers on specific disabilities, including: learning disabilities, Hidden Impairments: Reasonable Adjustments.

E-mail: Send Information to Disabled Claimants/Customers

76. DWP may need to use e-mail as a way to communicate with a disabled claimant/customer to make sure that they can fully access our services. The customer must give a valid and informed consent to the use of e-mail so you must be sure that each individual customer understands the risks of data being lost, intercepted or manipulated once it has left our secure IT systems and this consent must be recorded so that you can rely on it if challenged.

77. As e-mail use carries additional risks, we must only use it when there is a valid reason to do so, such as in order to make a reasonable adjustment under the Equality Act. For more information, see using e-mail as a reasonable adjustment to communicate with disabled customers.

78. You **must** follow security guidance- see: Electronic Communications with Citizens Guidance. You **must** also follow the DWP Records Management Policy and any benefit specific process requirements. If you have any doubts or questions contact the Knowledge, Information and Records Management team or the Security Advice and Support Centre

Home Visits

79. To make reasonable adjustments for customers with mobility needs the office environment and other accessibility issues must be considered. For example it may be more appropriate to arrange a home visit.

Induction Loops

80. Induction loops let hearing aid user's tune into what they want to hear without background noise. The loop symbol should be displayed to tell claimants/customers that a loop is provided (most DWP offices should have rooms with induction loops).

81. Listeners adjust their own hearing aids for volume. Their hearing aids also ensure that the range of tones is right.

Large Print: Providing Information in Large Print

82. If a claimant/customer requests communications/correspondence in large print consider first if you could give better service by providing the information in other ways, for example by email or use of intermediary (including family/friend)

83. It is recommended staff discuss the options available with the customer so consideration can be given to providing the most appropriate way of enabling the customer to access benefits and use our services

84. Large print means a minimum of 16 point in Arial or Univers font. If a claimant/customer requests information in Large Print, then local arrangements may be in place to provide documents in large print. Check with your line manager. Examples of what is in place are listed below. This list is not exhaustive.

- JCP Customer service A-Z
- State pensions
- CMG
- PIP
- DLA

85. Any content within the correspondence which is time-bound or with a deadline needs to take account of the potential delay for undertaking this procedure so explain to the claimant/customer there may be a slight time delay with this process. Extend any relevant response times / deadline dates accordingly.

86. There is no requirement to explain our internal processes to customers in relation to how we provide Reasonable Adjustments.

87. Contact the DWP Equality Team Social Justice if you require further advice/support.

88. If you require a leaflet or other formal publication in large print refer to the communications support services guidance for advice on how to get these documents in large print for claimants/customers.

Paper - Types/colour

89. If you get a request from a disabled person for communications to be printed on 'white' paper (as opposed to the recycled paper DWP use as standard) you should provide this. You should hold a local stock of white paper. Check that you do with your Line Manager, stationery or business support team as appropriate

Postal claiming JSA

90. Claimants must be offered postal status if they have a mental or physical disability, which restricts their mobility

Private Interview Rooms

91. We will arrange a private interview room or quiet area for those claimants/customers attending a face-to-face meeting who have a specific need, require additional support or who have requested this as a reasonable adjustment. We will provide accessible interview facilities in DWP buildings and/or on our partner premises.

92. Refer to internal processes for arranging interviews.

Representatives and Intermediaries

93. All types of disability and all customers with protected characteristics can be supported by providing services through a representative or intermediary. This can be done as a reasonable adjustment for disabled people and as additional assistance where appropriate for any customer.

94. Some of our claimants/customers want or need to use a representative/intermediary to help them access DWP services. If a claimant/customer wishes to use a representative/intermediary to access our services, then follow the Working with Representatives Guidance and work with them. Note: you still need to be aware of the duty to protect claimants'/customers' personal information, and disclosing information rules. If you feel a representative or intermediary would help the customer check with them first; don't make assumptions. The only exception to this rule is that you can assume the representative/intermediary has the claimant's/customer's permission where the implicit consent rules apply.

95. **Do:**

- apply the Working with Representatives Guidance;
- treat each case on an individual basis;
- make a written record of what was disclosed, to whom, and when – in all cases; and
- follow the guidance for bogus callers if you are suspicious of any enquiry.

96. **Do not:**

- disclose information if you have any reasonable doubt
- be pressured into giving information – refer the call to your line manager;
- assume written consent is for an indefinite period. The authority to represent the claimant/customer is for a particular item of business; and
- apply blanket policies in disclosing to representatives/intermediaries. In all cases decisions must be made on an individual basis.

Textphones

97. DWP have in place TextBox (also known as Soft Textphone) to enable you to communicate with a deaf or hearing impaired person.

98. A textphone is similar in function to a telephone except that the handset is replaced by a keyboard and display screen. The call is made or answered in a similar way to an ordinary telephone but rather than speaking, the communication takes place through the keyboard. Both the claimant/customer and member of staff must have access to a textphone.

Texting via mobile phones

99. Business mobile phones may now be used for texting in limited circumstances and if required as a reasonable adjustment for disabled people. See the communications with citizens guidance for more information

Use of toilets on DWP premises

100. Disabled people may use toilets on DWP premises. Guidance/further information on this is under development.

Transport - Public and private

101. If a customer has to travel by car because of mobility issues, consider the car parking facilities at your office and if possible arrange a parking space for the customer. If there is no car parking facilities then consider an alternative way to enable them to access benefits and services.

102. If mobility issues means a customer cannot walk for long distances and your office is not near to public transport then consider an alternative way to enable them to access benefits and services

103. Consider paying for a taxi or other transportation that will overcome the issues in relation to accessing to DWP sites

Blind or Partially-sighted Customers: Reasonable Adjustments

104. Discuss with the customer if they require any support to enable them to access benefits and use our services. Do not assume or put a reasonable adjustment in place without discussion with the customer. Consider, does the individual require extra support to communicate with DWP? Take the appropriate action to implement the required support and record the details on the customer record

105. If a blind or partially-sighted person asks for someone to greet them on arrival to help reassure them about their interview or appointment, a specific member of staff should be made aware of the appointment time of the

disabled claimant/customer and be available to undertake this task. There should be a contingency plan if this officer is unable to greet the customer.

106. The Business Disability Forum Welcoming disabled customers guide (Word) provides further general information

107. There could be many reasons why a blind or partially-sighted customer/claimant requests email. It may be that they have a reader application on a device of their own or wish us to email information to them so that they can pass it over more quickly to someone who they wish to assist them, etc.

- E-mail: Send Information to Disabled Claimants/Customers
- Representatives and Intermediaries
- Audio/CD format: Providing Information in Audio/CD Format
- Audio recording of interview
- Braille: Providing Information in Braille
- Large Print: Providing Information in Large Print
- Paper - Types/colour of paper
- Changing the time and date of meetings and interviews
- Changing location of interview
- Private Interview Rooms

Deaf or Hearing Impaired Customers: Reasonable Adjustments

108. Discuss with the customer if they require any support to enable them to access benefits and use our services. Do not assume or put a reasonable adjustment in place without discussion with the customer. Consider, does the individual require extra support to communicate with DWP? Take the appropriate action to implement the required support and record the details on the customer record.

- British Sign Language (BSL) Interpreting
- E-mail: Send Information to Disabled Claimants/Customers
- Induction Loops
- Textphones
- Changing the time and date of meetings and interviews
- Lip Reading: if the claimant/customer lip reads, care should be taken when arranging the interview area, it should be well lit and free from distractions, for example people constantly passing by etc.
- Private Interview Rooms
- Representatives and Intermediaries

Mental Health conditions: Reasonable Adjustments

109. The definition of disability under the Equality Act includes physical and mental impairments. Mental illness can therefore be a disability and reasonable adjustments must be considered.

110. Difficulties experienced are quite variable depending on the nature and severity of the disorder. Forgetfulness, lack of motivation and distress may affect the ability to make decisions and manage a claim. Some claimants may lack mental capacity

111. Discuss with the customer if they require any support to enable them to access benefits and use our services. Do not assume or put a reasonable adjustment in place without discussion with the customer. Consider, does the individual require extra support to complete their claim, comply with processes or make decisions about their claim? How much support is required and will this change? Do they have mental capacity? Take the appropriate action to implement the required support and record the details on the customer record

112. Please see the Mental Health Advisor Toolkit for further help on supporting customers with Mental Health conditions.

- Changing the time and date of interviews
- Private Interview Rooms
- Representatives and Intermediaries

Hidden Impairments

113. By definition, it can be difficult to provide an appropriate service for customers who may not find it easy to explain their needs, especially if those needs are not easily apparent. A Hidden Impairments Toolkit has been developed to help staff support customers with conditions such as autism. The Toolkit provides comprehensive information to enable staff to work better with individuals with hidden impairments, for example ADHD, Autism Spectrum disorders/conditions, Dyslexia and Dyspraxia. Other help and support is available:

- Business Disability Forum briefing papers give practical disability related guidance for employers on specific disabilities, including: asthma, back problems, diabetes, dyslexia, epilepsy, HIV, learning disabilities, mental health problems, progressive or fluctuating conditions, sight problems, stammer, upper limb disorders (repetitive strain injuries).
- Autism spectrum disorder (ASD) guidance has been produced. ASD is the name for a range of conditions that affect the way a person communicates and interacts with other people. Asperger syndrome is a form of autism. This information provides advice for staff on autism spectrum disorder and is mainly sourced from the National Autistic Society website.
- Employment, Health Conditions & Disabilities Guidenotes for Advisers- These guide notes are primarily designed to help Disability Employment Advisers in Jobcentres but contains useful information for all staff.

Learning Difficulties and Cognitive and Neurological Conditions: Reasonable Adjustments

114. These conditions may cause difficulties with learning or remembering. Discuss with the customer if they require any support to enable them to access benefits and use our services. Do not assume or put a reasonable adjustment in place without discussion with the customer. Consider, does the individual require extra support to complete their claim, comply with processes or make decisions about their claim? How much support is required and will this change? Take the appropriate action to implement the required support and record the details on the customer record

- Audio recording of interview
- Easy Read Format
- E-mail: Send Information to Disabled Claimants/Customers
- Private Interview Rooms
- Representatives and Intermediaries

Mobility needs / Physical impairments: Reasonable Adjustments

115. Discuss with the customer if they require any support to enable them to access benefits and use our services. Do not assume or put a reasonable adjustment in place without discussion with the customer. Consider, what mobility problem does the individual have, is the local office accessible? Take the appropriate action to implement the required support and record the details on the customer record

116. Consider telephone interviews or home visits rather than face to face interviews on DWP premises if more appropriate for your customer.

117. Medical appointments/treatment: Consider whether the customer and the delivery of our services can be supported by changing the date and time of a meeting or interview.

- Car parking facilities
- Changing the time and date of meetings and interviews
- Changing location of interview
- Home visits
- Postal claiming - JSA
- Representatives and Intermediaries
- Transport – public and private transport

Disability, Records, Computer System Markers and Reasonable Adjustments

118. Once a customer's need for a reasonable adjustment such as an alternative format has been identified, the customer's records must be marked in such a way that it is easily seen each time a member of staff looks at that record or takes action on the case.

119. If the case is clerically maintained, the reasonable adjustment need must be prominently displayed on the case papers.

120. If there are system records for the customer, the relevant reasonable adjustment field must be completed. If the system does not have a field for this purpose then the Notepad or equivalent must be used to record the need. Refer to the benefit specific guidance.

121. It is very important that the reasonable adjustment is consistently provided for the customer. Therefore, each time that action is taken on a case, staff must check to see if there is a reasonable adjustment marker on the case. The record of the reasonable adjustment must make it clear to colleagues what has to be done, when and how.

122. Remember that data relating to Disability is sensitive information under the Data Protection legislation. You must follow benefit specific guidance for how to record this data. Direct any questions or concerns you may have to the Advice Line/guidance owners in the first instance, including if you feel you have identified a gap.