

Policy Name:	<b>Equality, Diversity &amp; Inclusion Policy</b>
File No:	P31
Version:	4.0 (Final)

Policy Custodian:	<b>Chief Executive Officer</b>
Policy Champion: (if applicable)	<b>All Members of the Senior Leadership Team</b>

This document also relates to the following St Basils policies, procedures, and guidelines:

- Confidentiality
- Health and Safety
- Safeguarding
- Anti-social behaviour
- Recruitment and Selection
- Whistleblowing
- Complaints, Comments, and Compliments
- Code of Conduct
- Eviction and Abandonment
- Allocations and Referrals
- Assessment and support Planning
- Dignity and Respect
- Learning and Development
- Disciplinary
- Grievance
- EDI Action Plan
- EDI Strategy
- Race Equality Code of Governance

**Consultation Framework:**

Review and Consultation of this policy has taken place with the following parties during the following periods of time:

Custodian	April 2023 - July 2023
Champion	Support from Associate EDI specialist throughout the review
Senior Leadership Team	18.05.2023 - Approved
Sub Committee (SDDC)	07.08.2023 - Approved
Board	11.09.2023
Other (please specify)	BRAP 20.06.2023 – 29.06.2023

Approved by:	The Board	Approved date:	11.09.2023
Issue date:	Not yet issued	Review due by:	June 2025

## Policy Statement

St Basils is committed to creating an environment for employees, young people and all stakeholders that is free from all forms of discrimination and where diversity and equity are embraced. It is our intention to do our very best for each young person, ensuring that the service St Basils offers is fair, inclusive, appropriate and relevant for each individual. St Basils also wants to ensure that employees are provided with the best employment opportunities and that they are enabled to contribute effectively to the work of the organisation.

Our strategic priority 'Challenging discrimination and promoting equality, diversity, inclusion and cohesion through employment, service delivery and community engagement', highlights our commitment to ensuring that employees and young people are provided with a safe and secure environment in which they can thrive and develop, and where all aspects of their welfare is protected.

St Basils recognises that the events in 2020 placed the murder of George Floyd at the front and centre of public attention. This seismic moment was a trigger point for anti-racism protests and the need for us to look deeper into what systemic and institutional racism looks like. Also, this is an opportunity for us as a service provider for young people to truly examine what we need to do to become a truly anti-racist organisation that provides an inclusive space for all.

We know that we need to do more to tackle racism in our society – wherever and whenever it occurs. We need to now ensure that our employees and young people find a safe space within St Basils that does not perpetuate the racism that exists within society, in our organisation directly or indirectly through our policies and procedures. We can no longer simply be not racist; at St Basils we will endeavour to be an actively and visibly anti-racist organisation that is also an ally to all GEM groups (Global Ethnic Majority).

## Scope of Policy

This policy applies to the governance of St Basils, all employees, in all departments and services as well as young people whether or not they are St Basils' residents and/or support service users.

For the purposes of this policy the term 'employee' will include all employees (whether full time or part time), volunteers, casual workers and contracted workers.

The scope of this policy also includes suppliers of goods and services, partner organisations and the wider community.

## Definitions

**Equality** means access or provision of equal opportunities, where individuals are protected from being discriminated against in regard to age, disability, sex, gender reassignment, pregnancy and maternity, race, religion or belief, marriage and civil partnership and sexual orientation. These are protected characteristics as identified in the Equality Act 2010. In addition, we understand and respect that there can be differences between assigned sex and gender identity and expression, and we value the unique contribution of all employees, young people and partners, including individuals who identify outside of the gender binary.

This means equal rights for people regardless of any aspect of their identity, unhampered by prejudices or preferences, eliminating discrimination and any issues which could result in less favourable treatment to an individual or group of individuals. Equality is about creating a fair and inclusive environment where everyone can participate and has the same opportunity to fulfil their potential.

**Diversity** is about recognising, valuing and taking account of people's different backgrounds, knowledge, skills, and experiences, and encouraging and using those differences to create a productive, effective and inclusive community and workforce where everyone feels valued.

An **inclusive** environment is quite simply one 'where everyone feels able to participate and achieve their potential' (CIPD).

**Equity** refers to ensuring fairness and justice and recognises that each person has different circumstances which require us to acknowledge and make adjustments to ensure equality of opportunity.

## Legislation and Guidance

There is a great deal of legislation and regulation associated with equality and diversity. This policy aims to ensure that employees not only comply with legislation and regulations, but also meet the current standards of good practice. We list here the key Legislation and Codes of Practice that have been considered when developing this policy and associated action plan:

Equality Act 2010 (see appendix 3) or go to: [www.gov.uk/equality-act-2010-guidance](http://www.gov.uk/equality-act-2010-guidance)  
Housing Act 2004 (Gypsies and Travelers)  
The Human Rights Act 1998 (see appendix 4) or go to: [www.equalityhumanrights.com](http://www.equalityhumanrights.com)  
Equality and Human Rights Commission Codes of Practice  
Regulatory Framework of Social Housing in England - Homes and Communities Agency [HCA]  
The Data Protection Act 2018 (inc: GDPR)  
National Housing Federation – Code of Governance

### **General Principles**

This policy is designed to help St Basils create a productive, effective and inclusive environment and workforce, which is free from discrimination and where everyone is respected and feels valued.

### **We aim to do this by:**

- Being an employer of choice, for people from different backgrounds and with different experiences.
- Establishing a workforce, at all levels, which reflects the diversity of the wider community in which we work.
- Responding to the diverse needs of young people who are homeless or at risk.
- Complying with current legislation.
- Collecting equalities information about our employees and young people. Reviewing this information to see if there are particular groups of people we are not reaching or if there are particular groups who are not getting the same level of service as others.
- Ensuring no person or group receives less favourable treatment taking into consideration all the protected characteristics and key human rights and that all employees, and young people using our services, are treated with fairness and respect
- Providing equality of opportunity and fair treatment for all persons
- Ensuring reasonable adjustments are made to working arrangements and premises to ensure equal access for young people, employees or potential employees, who have particular needs or who are disabled (see appendix 5).
- Ensuring no person or group is disadvantaged by conditions or requirements that cannot be shown to be justified.
- Educating our young people in the spirit of this policy, making them aware of their obligations and rights under the Equality Act.
- Involving young people in activities to widen their knowledge and experience of living and working with people from many different cultures and backgrounds.
- Ensuring young people learn to appreciate these differences and allow everyone the opportunity to live and work in a way that they would value.
- Creating a living environment for our young people that is safe, secure and free from discrimination. An environment in which they can thrive and develop and where all aspects of their welfare is protected.
- Building positive and trusting relationships with local communities through effective engagement, responding proactively to local concerns and encouraging support for local schemes and young people.

Young people who are concerned about breaches of this policy (see appendix 1) can seek redress through the Complaints, Compliments and Comments policy and procedures. In relation to young people, breaches of their Licence Agreement referring to Equality and Diversity, could lead to warnings, sanctions and possible eviction.

Employees have a duty to safeguard young people from abuse, including discrimination and harassment, under St Basils Safeguarding Policy and Procedures. If an employee or trainee feels they have been discriminated against (see appendix 2), they should seek redress through the organisation's Dignity at Work Policy and Procedures. Misconduct and breaches of this policy could lead to disciplinary action for employees and possible dismissal.

Volunteers and Partners should seek redress through the Complaints, Compliments and Comments policy and procedures. In relation to partners and suppliers of services, breaches of this policy could lead to termination of the service agreement.

## **Roles and Responsibilities**

The Organisation is committed to:

- The provision of training, development and progression opportunities for employees. We will ensure that opportunities for training, development and promotion apply equally to all employees and will monitor uptake.
- Providing induction, training and development opportunities for managers and employees, to improve their awareness of the business and the practical implications of diversity and equality. All employees are required to attend this training and subsequent refreshers.
- Ensuring that we use employees' feedback as a means to understand the effectiveness of training opportunities and their delivery.
- Reporting, in an annual report, St Basils progress in meeting equality obligations and plans for the future to employees and young people.
- Having clear procedures in place to support employees, young people and partners who feel they have been discriminated against and wish to register a complaint.
- Reaching communities to ensure they access our opportunities and services – by using our collated data and information to identify gaps and need. Removing barriers to accessing our services.
- Focus on the needs of young people and be committed to ensuring that the results from engagement are integrated into service design and delivery and that young people are involved in that delivery

St Basils employees have a commitment to follow the principles of this policy in order for the organisation to collectively ensure it maximises the benefits of Equality, Diversity and Inclusion.

All Employees should therefore be committed to:

- Understanding and promoting our commitment to Equality, Diversity and Inclusion
- Creating an environment in which individual differences and the contributions, of all our young people, employees and partners, are recognised and positively valued.
- Ensuring every young person, employee or partner, lives, works or operates in an environment that promotes dignity and respect.
- Creating an environment where employees, young people and partners know that no form of intimidation, bullying or harassment is tolerated
- Creating a safe, inclusive environment where employees, young people and partners feel supported to raise, challenge and discuss examples of actual or potential discrimination.
- Demonstrating in their own conduct and the way they talk/behaviour that they oppose attitudes and behaviour that debase, degrade, inflict injury on or promote animosity against young people

## **Training Requirements**

Provision of regular and appropriate training for all board members and employees to raise awareness of equal opportunities and diversity issues will be provided.

### **Communication**

This policy will be communicated effectively to all employees via a range of different media avenues and can be produced in other formats where needed.

### **Policy Responsibility**

The Board of Directors and Directorate of St Basils have accepted this policy and have overall responsibility for its implementation and effectiveness.

The day to day implementation of this policy is the responsibility of all line managers.

All employees, partners and young people in receipt of services, are responsible for adherence to the spirit and intent of this policy.

The policy will be implemented by:

- A review of current practices and identification of areas for improvement on an annual basis. This will be collated in the form of an Equality Action Plan by the Senior Leadership Team.
- Involving young people in the design and setting of standards, monitoring services and identifying priorities related to equality, diversity and inclusion
- Providing resources to plan, carry out and monitor the policy, overseen by Senior Leadership Team and Board of Directors.
- Devising and developing positive action programmes where appropriate, overseen by the Senior Leadership Team
- Members of the SLT, monitoring progress, reporting to the Board of Directors at regular intervals, and periodically reviewing the policy itself.

### **Continuous Renewal Clause**

This procedure will be reviewed every 2 years by the organisation to ensure it is in accordance with good practice guidance, prevailing legislation and statutory frameworks. However, this policy may be assessed before that time as necessary – such as:

- if it becomes ineffective
- to reflect substantial changes in practice
- following inspection, as recommended by auditors
- or changes required by law

### **Disclaimer**

This document can only be considered valid when viewed on the St Basils Workplace/Shared: Drive. If this document has been printed or saved to another location, you must check that the version number on your copy matches that of the document online. Hard copies of this document are considered uncontrolled - please refer to the St Basils Workplace for latest version.

**Appendix 1**

## **How you can be discriminated against**

Discrimination can come in one of the following forms:

- Direct discrimination - treating someone with a protected characteristic less favourably than others
- Indirect discrimination - putting rules or arrangements in place that apply to everyone, but that put someone with a protected characteristic at an unfair disadvantage
- Harassment - unwanted behaviour linked to a protected characteristic that violates someone's dignity or creates an offensive environment for them
- Victimisation - treating someone unfairly because they have complained about discrimination or harassment

You're protected from discrimination in these situations:

- At work
- In education
- As a consumer
- When using public services
- When buying or renting property
- As a member or guest of a private club or association

You are legally protected from discrimination by the Equality Act 2010.

You're also protected from discrimination if:

- You are associated with someone who has a protected characteristic, e.g. a family member or friend
- You have complained about discrimination or supported someone else's claim

Positive discrimination is unlawful but positive action may be lawful in certain circumstances and only where it can be objectively justified that positive action is appropriate.

The positive action provisions in the Equality Act 2010 allow employers to take action that may involve treating one group that shares a protected characteristic more favourably than others, where this is a proportionate way to enable or encourage members of that group to:

- overcome or minimise a disadvantage
- have their different needs met
- participate in a particular activity

## **DISCRIMINATION AT WORK**

It is against the law to treat someone less favourably than someone else because of a personal characteristic listed in the Equality Act 2010.

For example:

- Not hiring someone
- Selecting a particular person for redundancy
- Paying someone less than another worker without good reason

Discrimination does not have to be deliberate and intentional. You can discriminate indirectly with working conditions or rules that disadvantage one group of people more than another.

If you think you've been unfairly discriminated against you can:

- Complain directly to the person explaining that their behaviour is offensive and unwanted. This informal approach is often sufficient to correct the situation, particularly if the person was unaware that the behaviour was causing offence.
- Discuss the matter with your line manager.
- Seek redress through the organisation's Dignity at Work Policies and Procedures.
- Contact an Organisation who will give you support and advice.

See list below:

Examples

St Basils Employment Assistance Programme  
Citizens Advice Bureau  
Equality Advisory Support Service [www.equalityadvisoryservice.com](http://www.equalityadvisoryservice.com)

## **Equality Act 2010**

The Equality Act came into force on 1 October 2010, providing protection by law from discrimination on the basis of 'protected characteristics'. The Equality Act 2010 legally protects people from discrimination in the workplace and in wider society. It replaced previous anti-discrimination laws with a single Act, making the law easier to understand and strengthening protection in some situations. It sets out the different ways in which it's unlawful to treat someone.

We recognise that under current equalities legislation people are protected against discriminatory and unfair service provision based on the following characteristics:

- Age
  - Disability
  - Sex
  - Gender Re-assignment
  - Pregnancy & Maternity
  - Race
  - Religion or Belief
  - Sexual Orientation
  - Marriage and civil partnership
- (This is a protected characteristic within Employment Law)

These are called 'protected characteristics'.

### **Definitions of the nine protected characteristics:**

#### **Age**

Means a person or persons belonging to a particular age group. An age group includes people of the same age and people of a particular range of ages. Where people fall in the same age group they share the protected characteristic of age.

#### **Disability**

In the Act, a person has a disability if they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to perform normal day-to-day activities.

#### **Sex**

For the purposes of the Act, sex means being a man or a woman. Men share the sex characteristic with other men and women with other women.

#### **Gender Reassignment**

This is defined for the purpose of the Act as where a person has proposed, started or completed a process to change his or her sex. In the Equality Act (2010) a transsexual person has the protected characteristic of gender reassignment. A woman making the transition to being a man and a man making the transition to being a woman both share the characteristic of gender reassignment, as does a person who has only just started out on the process of changing his or her sex and a person who has completed the process.

Use of the term 'transsexual' has been criticised for its origins in psychological and medical communities and its association with undergoing gender-affirming medical procedures. St Basils prefers to use the term 'transgender' and the umbrella term 'trans' to describe people whose gender is different from the gender assigned to them at birth. St Basils also believes in the right of people to self-identity (e.g. as with no gender, or non-binary).

#### **Pregnancy and Maternity**



This is defined for the purpose of the Act as where a woman is protected against discrimination on the grounds of pregnancy and maternity during the period of her pregnancy and any statutory maternity leave to which she is entitled.

### **Race**

For the purposes of the Act, 'race' includes colour, nationality and ethnic or national origins. People who have or share characteristics of colour, nationality or ethnic or national origins can be described as belonging to a particular racial group.

### **Religion or Belief**

This covers people with religious or philosophical beliefs and includes those with non-religious beliefs. To be considered a religion within the meaning of the Act, it must have a clear structure and belief system.

To be considered a philosophical belief for the purposes of the Act, it must be genuinely held, be a belief and not an opinion or viewpoint, be a belief as to a weighty and substantial aspect of human life and behaviour, attain a certain level of cogency, seriousness, cohesion of importance, and be worthy of respect in a democratic society, compatible with human dignity and not conflict with fundamental rights of others.

### **Sexual orientation**

This is defined in the Act as a person's sexual orientation towards:

- People of the same sex as him or her (in other words the person is a gay man or a lesbian)
- People of the opposite sex from him or her (the person is heterosexual)
- People of both sexes (the person is bisexual)

People sharing a sexual orientation means that they are of the same sexual orientation and therefore share the characteristic of sexual orientation.

### **Marriage and Civil Partnerships**

This refers to people who have the common characteristic of being married or of being civil partners.

- People who are not married or civil partners do not have this protected characteristic
- A person who is engaged to be married is not married and therefore does not have this protected characteristic
- A divorcee or a person whose civil partnership has been dissolved is not married or in a civil partnership and therefore does not have this protected characteristic

**For further information regarding the Equality Act and the recognized characteristics go to:**

[Discrimination: your rights - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

## **The Human Rights Act 1998**

The Human Rights Act 1998 came into force in the United Kingdom in October 2000. It is composed of a series of sections that have the effect of codifying the protections in the European Convention on Human Rights into UK law.

The rights covered within this act includes:

- Right to life
- Freedom from torture and inhuman or degrading treatment
- Right to liberty and security
- Freedom from slavery and forced labour
- Right to a fair trial
- No punishment without law
- Respect for your private and family life, home and correspondence
- Freedom of thought, belief and religion
- Freedom of expression
- Freedom of assembly and association
- Right to marry and start a family
- Protection from discrimination in respect of these rights and freedoms
- Right to peaceful enjoyment of your property
- Right to education

This list and explanations of these rights and how they could be interpreted in the work place can be found at Equality & Human Rights Commission website at:

[www.equalityhumanrights.com/human-rights](http://www.equalityhumanrights.com/human-rights)

**The human rights-based approach is the process by which human rights can be protected by adherence to underlying core values of fairness, respect, equality, dignity and autonomy, or FREDA.**

Examples of how these may apply to St Basils workplace and services is shown in the table on the page below

Table 1: Examples of how **FREDA** apply to St Basils workplace and services

<b>Principle</b>	<b>What it means to us</b>
<b>Fairness</b>	<p><i>That employees and young people are treated – and treat others – fairly and understand what to do if they feel that this is not the case.</i></p> <p><i>That consideration is given to an individual's opinion, giving them the opportunity to have that point of view expressed, listened to and considered when decisions are being taken.</i></p> <p><i>That we have effective policies in place and employees are sufficiently competent and confident to respond to concerns and incidents raised by colleagues and young people.</i></p>
<b>Respect</b>	<p><i>Employees and young people's religious, cultural and lifestyle needs are taken into account.</i></p> <p><i>That we actively encourage and promote understanding of different cultural and lifestyles across our service user and employees' groups.</i></p> <p><i>That we create an environment which is inclusive and in which individual differences and contributions are recognised and valued.</i></p> <p><i>Risk assessments are carried out appropriate to the young person's needs.</i></p>
<b>Equality</b>	<p><i>That employees and young people have the opportunity to live and work in a way that they would choose and value.</i></p> <p><i>To create an environment that is free from discrimination off any sort.</i></p> <p><i>That policies and procedures are in place to protect everyone from being treated unfairly because of their differences and physical needs.</i></p> <p><i>Employees and young people have the opportunity to seek redress if they feel they have been treated unfairly or have suffered victimisation.</i></p>
<b>Dignity</b>	<p><i>Employees and young people should take care to ensure that their behaviour supports and promotes and does not undermine, a person's self- respect regardless of people's differences.</i></p> <p><i>Everyone should be treated as a human being with due consideration given to their differences and prevailing circumstances.</i></p> <p><i>Employees and young people's records are kept confidential and only accessible to relevant employees.</i></p> <p><i>Employees and young people are protected from discrimination and are treated with dignity.</i></p>
<b>Autonomy</b>	<p><i>Consideration is given to encourage everyone to develop a sense of independence as well as having control over their choices and wishes.</i></p> <p><i>Employees and young people are encouraged to take an active part in decision making within the workplace and regarding the services they receive.</i></p> <p><i>Young people's views are incorporated into service provision and support is person centred.</i></p>



Guidelines are information intended to advise people on how something should be done or what something should be. A guideline is a statement by which to determine a course of action by streamlining processes according to a set routine or sound practice.

Name:	<b>Reasonable Adjustments</b>
File No:	G12
Version:	1.0 (Final)
Approved:	By the Board on 11.09.2023

Guideline Custodian:	<b>Chief Executive Officer</b>
Guideline Champion: (if applicable)	<b>Policy Review Officer</b>

St Basils are committed to making sure our services can be easily accessed by individuals with disabilities and/or additional needs. This guidance does not aim to explain how we will approach every circumstance where a person with disabilities requires a service to be adjusted. It is a general statement of our commitment to ensure a person with disabilities is not at a disadvantage when accessing our services. The guidance is for both employees who work with us and for young people who access our services. It defines what a 'reasonable adjustment' is, in what type of circumstances they will be carried out and how a request for a reasonable adjustment can be made. St Basils is a Disability Confident Employer.

This guidance does not explain how we will approach every situation; it will do the following: -

- I. Confirm our commitment to improving accessibility for all individuals.
- II. Set out the principles of our commitment to provide reasonable adjustments for individuals who require them.
- III. Details what factors we will consider when dealing with requests for reasonable adjustments.
- IV. Explain how individuals can appeal if they do not agree with St Basils decision relating to their circumstances.

Substantial disadvantage is defined in the Equality Act 2010 s.212(1) as 'more than minor or trivial'.

### Definitions

A reasonable adjustment is a legal term introduced under the Equality Act (2010). It means that we have a duty to make changes to make sure that, as far as possible, a disabled person has the same access to St Basils services and facilities as a non-disabled person. This may include, for example: Providing extra aids or services – for example providing information in alternative formats ...

### The Equality Act 2010

Under the Equality Act 2010 (The Act) a person is considered as having a disability if they have a physical or mental impairment that has a 'substantial' and 'long term' negative effect on their ability to carry out normal day-to-day activities. The Act provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

Under the Act, we have a legal duty to make adjustments in the following three circumstances:

- Where there is a provision, criterion or practice which puts a person with a disability at a substantial disadvantage in relation to a relevant matter in comparison with persons who are not disabled.
- Where a physical feature puts a person with a disability at a substantial disadvantage in comparison with persons who are not disabled; and or
- Where a person with a disability would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled.

## **1. What is a reasonable adjustment?**

- 1.1 A reasonable adjustment is a legal term described in the Equality Act (2010). It means that St Basils have a duty to make reasonable adjustments where its working practices (including policies and procedures) or physical premises put a disabled person at a substantial disadvantage in comparison with persons who are not disabled.
- 1.2 The Equality and Human Rights Commission suggests the following considerations when we decide whether an adjustment is 'reasonable' or not:
- How effective the adjustment(s) will be in assisting a person with a disability and in preventing or reducing the possibility of them being at a disadvantage.
  - The practicality of St Basils making the adjustment(s);
  - The cost of the adjustment(s) and whether this is possible within St Basils resources; and
  - Any disruption to the service that making the adjustment(s) may cause.
- 1.3 In the circumstance where we are unable to make a reasonable adjustment due to cost or resources, we will work together with the person in question to find the most appropriate alternative solution for them.

## **2. How to request a reasonable adjustment**

- 2.1 A reasonable adjustment can be requested from us in the following ways:
- In writing, explaining what the adjustment is and why it is needed. This can be done by letter or email at [info@stbasils.org.uk](mailto:info@stbasils.org.uk)
  - By telephoning our Head Office – 0121 772 2483.
  - By referral from a local authority or other relevant agency.
  - By a family member when we have been given permission for them to do so; and or
  - A member of staff may suggest for one to be made, when they are aware it will support the young person's needs.
  - Job applicants can inform us using the application form
  - Employees can contact their manager or a member of HR
- 2.2 In most cases we will be able to agree and deliver the required reasonable adjustment with a minimum of delay. However, in some cases it may be necessary for us to consider in more detail how best to overcome the difficulty a person with disabilities is experiencing and/or seek advice from expert disability organisations that can assist with signposting and other forms of support.

## **3. Adjustments that will be considered**

- 3.1 St Basils is committed to maintaining a high standard of accessibility to our services for all individuals we come into contact with. We should therefore ensure our approach embraces all individuals who have a mental or physical impairment as defined by the act as follows:

***“If they have a physical or mental impairment and the impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities (S6(1))”***

- 3.2 The following examples would be covered by this definition (this list is not exhaustive);
- I. Providing additional support for individuals with communication or learning difficulties
  - II. Providing additional support for individuals who need it due to a physical or emotional infirmity, or those with mental health conditions
  - III. Providing additional support for individuals with sensory impairments, such as those which affect sight or hearing
- 3.3 In some instances, we may provide reasonable adjustments in circumstances which are not defined as a disability according to the Equality Act but will make services accessible to individuals with special need or circumstance.
- 3.4 Whilst it is not possible to list all such circumstances, below is a list of some examples:
- I. Providing translation or interpreting services for individuals whose first language is not English.
  - II. Providing additional support for individuals with literacy problems.

III. Ensuring there is adequate wheelchair access to the workplace

#### **4. Keeping a record of a young person's needs**

- 4.1 When a young person accesses a service, they will be asked whether they have any support needs and/or any communication preferences.
- 4.2 These will be recorded onto our internal systems and will be used to meet the young person's specific needs throughout the duration of their time with us.
- 4.3 We will proactively check that we have the appropriate alerts and communication preferences recorded on our systems.

#### **5. Guidance for employees**

- 5.1 As a general rule, St Basils employees should adhere to the following approach.
  - I. **Ask – don't assume.** Remember that many disabilities or special needs are not necessarily visible or obvious. Therefore, we should ask our young people routinely whether they need additional support. We don't need to be intrusive –we should explain how we would normally deal with an issue the person has raised and then ask: "Do you need any additional support, for example because of a disability or other special circumstance?" That leaves the way open for the person to tell you as much or as little as he or she chooses about the circumstance whilst still requesting the support they need.
  - II. **Listen.** Most people with disabilities or special needs will know what support they need and will tell you how you can help them. Try to meet their request where it is reasonable to do so.
  - III. **Be flexible.** People in similar sets of circumstances may have different ways of dealing with them – just because people have a similar disability, it does not mean that they will require the same support.

#### **6. Reasonable adjustments to our complaints process**

- 6.1 We will make reasonable adjustments to our complaints service where necessary, ensuring individuals with a disability are not at a disadvantage when accessing the service.
- 6.2 Examples of the reasonable adjustments we will make are:
  - Using the individual's communication preference throughout the duration of the complaint;
  - We will not request a complaint to be made in writing where this presents a barrier or disadvantage to the individual due to their disability or additional needs;
  - Extension of any time limits (where it is lawful to do so); and
  - Provide information in alternative formats eg. large print or on coloured paper.
- 6.3 By adhering to the St Basils Equality, Diversity and Inclusion policy we will ensure our decision making is fair and does not present any barriers or disadvantage to individuals from any protected group (including disability) under the Equality Act 2010.

#### **7. Reasonable adjustments to our Lifeskills Programme**

- 7.1 We will make reasonable adjustments to our Lifeskills programme where this has been requested by a learner or identified by a Progression Coach. We will ensure reasonable adjustments are taken to avoid a substantial disadvantage that a learner may face due to their disability.
- 7.2 Reasonable adjustments must be requested before the assessment takes place (not to be confused with special considerations which are permitted post assessment).
- 7.3 The Internal Verifier (IV) is responsible for the decision-making process in relation to reasonable adjustment and special considerations applications. When requesting reasonable adjustments, the IV will follow any formal procedures and timeframes that align with Open College Network West Midlands Reasonable Adjustments Policy.

- 7.4 Examples of the reasonable adjustments we will make are:
- Providing targeted learning interventions based on a learner's specific needs throughout their programme
  - Ensuring learning environments are accessible
  - Provision of auxiliary aids such as colour overlays etc
  - Extension of any time limits (where it is lawful to do so); and
  - Provide information in alternative formats eg. large print or on coloured paper.
- 7.5 By adhering to the St Basils Equality, Diversity and Inclusion policy we will ensure our decision making is fair and does not present any barriers or disadvantage to individuals from any protected group (including disability) under the Equality Act 2010.

## **8. Appeals**

- 8.1 If an employee is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment they can use the grievance procedure to highlight this.
- 8.2 If an individual, who is not an employee, is dissatisfied with the arrangements or decisions we have made regarding a reasonable adjustment, we will respond in accordance with our Complaints Policy.
- 8.3 If necessary, when reviewing our decision, we will seek advice from specific expert disability groups.