

Reasonable Adjustments for Staff Policy

1. Introduction and values

- 1.1. As set out in Strategy 2030, Queen Mary's ambition is to be the most inclusive university of our kind, anywhere. Our vision is to open the doors of opportunity. Our mission is to create a truly inclusive environment, where students and staff flourish, reach their full potential and are proud to be part of the University. Our Values are inclusive, proud, ambitious, collegial, and ethical; these values directly support our mission.
- 1.2. The support and inclusion of staff and applicants that have a disability and/or long-term condition is vital to achieving our strategic ambition, our vision to provide opportunities so all can flourish, and our mission to foster a truly inclusive environment.

2. Aims and purpose

- 2.1. This policy aims to:
 - Demonstrate our university-wide commitment to inclusion and accessibility by setting out the University's overarching principles and approach to providing reasonable adjustments for staff and applicants.
 - Improve the working experience of disabled staff by setting out the principles and standards by which colleagues can expect to receive the reasonable adjustments required to successfully carry out their role.
 - Reduce or remove barriers to obtaining reasonable adjustments, supporting disabled staff to perform their duties to the best of their abilities.
 - Ensure a consistent understanding and approach in how reasonable adjustments are considered, agreed, and implemented across the working lifecycle, signposting towards key guidance resources for colleagues and managers.
 - Clarify the University's legal responsibilities under equality legislation, ensuring we meet our duty to provide reasonable adjustments while promoting fairness

and minimising legal risk.

- 2.2. The policy sets out Queen Mary's overarching position but is not intended to provide detailed step-by-step guidance on how to manage or implement individual reasonable adjustment requests.
- 2.3. This policy does not act as a standalone document. When considering reasonable adjustments, staff and line managers are advised to refer to [Queen Mary's Disability Inclusion in the Workplace Hub](#), a resource designed to act as the go-to resource for practical guidance, support and information on all aspects of disability inclusion in the workplace. The resource includes specific guidance regarding reasonable adjustments. The Hub and this policy are intended to support each other. However, if there is any inconsistency then this policy will take priority.
- 2.4. The purpose of the policy does not extend to inclusive design across the built environment. These anticipatory duties are important but do not fall under our reasonable adjustments policy.

3. Scope: Who does the policy cover?

- 3.1. Our duty and responsibilities for reasonable adjustments cover a wider set of individuals than just employees. It includes all workers, contractors, and job applicants.
- 3.2. This policy applies to:
 - All Queen Mary employees and workers, including contractors and self-employed people hired to personally undertake work, regardless of their contract type or working pattern,
 - Job applicants,
 - Line managers,
 - Hiring Managers,
 - Queen Mary teams and services delivering or supporting reasonable adjustments.
- 3.3. The policy covers working practices and activities across the entire employment lifecycle – from recruitment and onboarding through to departure from Queen Mary.
- 3.4. The policy does not cover the provision of reasonable adjustments or disability-related support for students. Staff or students seeking advice or information relating to student support can refer to the following relevant services and resources:
 - [Reasonable Adjustments in Academic Assessment Policy](#).
 - [Support whilst you are here - Disability and Dyslexia Service](#).

4. Legislative context and inclusive language

- 4.1. Under the Equality Act (2010), a person is considered disabled if they have a physical or mental impairment which has a long-term adverse effect on their ability to carry out normal day-to-day activities. The Equality Act defines long-term as 'having lasted or being likely to last for at least 12 months or more'.
- 4.2. Within this policy, Queen Mary uses language and legal definitions that align with the Equality Act. It is recognised that these definitions can emphasise a medical model of disability, which can reinforce negative perceptions or stigma. A key focus is to set out the University's position in supporting disabled colleagues and colleagues with long-term conditions, and to do so by removing barriers, rather than assessing whether an individual 'qualifies' or is eligible for an adjustment.

The language used within the supporting [Disability Inclusion Workplace Hub](#) reflects the University's commitment to the social model of disability. This approach ensures that legal responsibilities are clearly set out whilst also embedding good practice through inclusive and respectful disability related language. Further information on this approach is available within the Hub.

- 4.3. Under the Equality Act, a wide range of conditions may be covered. Examples include, but are not limited to:
 - Physical or sensory impairments – for example: mobility related disability or condition and hearing or visual impairments,
 - Neurodivergence and learning differences – such as autism, ADHD, or dyslexia,
 - Mental health conditions – including depression, anxiety or obsessive-compulsive disorder (OCD),
 - Long-term health or medical health conditions – for example: HIV, epilepsy, or cancer.

5. Reasonable adjustments: Principles

- 5.1. 'Reasonable adjustments' are a legal framework, and requirement, for supporting disabled staff and applicants.
- 5.2. A reasonable adjustment is a change an employer makes to remove or reduce barriers related to someone's disability. This duty applies when a role, workplace, or arrangement creates a barrier for a disabled person compared to non-disabled people.
- 5.3. Adjustments are tailored to the individual and their circumstances, based on their needs and barriers. As such, reasonable adjustments are considered and implemented on a case-by-case basis.

- 5.4. Common adjustments exist, but what works for one person may not work for another—even with similar roles or disabilities.
- 5.5. Reasonable adjustments depend on context—what’s reasonable varies by situation.

6. Examples of reasonable adjustments

- 6.1. Reasonable adjustments for staff members could include:
 - Making changes to the workplace (accessibility),
 - Changing a colleague’s working arrangements (flexibility),
 - Finding different ways of doing something (process adaptation),
 - Providing equipment, services or support (assistive equipment/services).
- 6.2 Reasonable adjustments for applicants during recruitment processes could include:
 - Holding the interview/assessment in an accessible building (accessibility),
 - Providing extra time in assessments and interview (flexibility),
 - Providing questions in advance of interview (process adaption),
 - Providing communication support such as British Sign Language (BSL) interpreter during the interview.
- 6.2. It is not possible to produce an exhaustive list of reasonable adjustments since this will vary depending on individual circumstances and the nature of an individual’s role.

7. Determining reasonable adjustments

- 7.1. Employers are only required to make adjustments that are reasonable. When assessing whether a particular adjustment is reasonable, a range of factors will be taken into account. What is reasonable depends on each situation and the assessment of reasonableness is an objective test, based on what is fair and practical in the circumstances, rather than on individual opinions.
- 7.2. When considering a potential adjustment, line managers will consider the following factors, with support from Employee Relations, Health and Safety and other relevant colleagues as needed:
 - The extent to which the step would be effective in overcoming the barrier,
 - The extent to which the adjustment is practical,
 - The financial implications of the adjustment and resources available,

- The availability of external financial or other assistance e.g. [Access to Work](#),
 - The impact on work of the team and/or impact on work of other team, members (e.g. impact on wellbeing of the team, impact on service delivery or the quality-of-service delivery).
- 7.3. In line with our duties as an employer, Queen Mary will consider each potential reasonable adjustment independently and will not take a one-size approach. Whilst adjustments that are determined to not be reasonable will not be made, other options will be considered. This could include making other adjustments that are reasonable.
- 7.4. The Equality Act makes it unlawful to pass on the costs to a disabled employee. Queen Mary funds reasonable adjustments from local budgets (e.g. Institute/School/Directorate).
- 7.5. If the staff member needs additional support that Queen Mary's resources cannot cover, Access to Work may be able to provide this support. Access to Work can help with extra costs which would not be reasonable for an employer to pay and help a person whose health or disability affects their work by giving them advice and support. The disabled employee must make the Access to Work application(s), but we recommend that managers support their staff member to complete it.

8. Role and responsibilities: Employer

- 8.1. Queen Mary has a legal duty to make reasonable adjustments for disabled staff where a part of the role, workplace or working arrangement creates a barrier for a disabled person compared with non-disabled people. This duty is relevant even when the University has not been formally notified but could reasonably be expected to know about the barrier.
- 8.2. Beyond this, the University has a responsibility:
- To support disabled applicants to Queen Mary to understand their options for requesting and accessing reasonable adjustments during their recruitment and selection process.
 - To support disabled staff at Queen Mary to understand their options for requesting and accessing reasonable adjustments during their employment.
 - To support line/hiring managers at Queen Mary to understand their options for providing and supporting reasonable adjustments across the staff lifecycle.
 - To provide an inclusive environment where disabled staff feel valued and supported.
 - To treat all personal data related to disability as sensitive and to manage and maintain it in line with our data protection policies.

- To collect and evaluate data on disability inclusion, to inform the design and review of interventions.
 - To actively support the return (or cessation) of equipment and subscriptions provided as a reasonable adjustment when these are no longer required.
- 8.3. The University and our managers will seek professional, expert advice where necessary to help assess needs and implement adjustments considered to be reasonable. Internal services include:
- Equipment and software solutions requiring the professional input of departments such as Procurement, Facilities, Health and Safety and IT.
 - People and Policy advice available through [HR's Employee Relations](#) and [Equality, Diversity & Inclusion Team](#) (hr-equality@qmul.ac.uk).
 - Funding for reasonable adjustments must come from the local area's budget code. Where the sum is greater than £1000, line managers should consider engaging Access to Work.
- 8.4. External, third-party services include:
- Occupational Health Advisory Service,
 - The Business Disability Forum,
 - Access to Work.
- 8.5. Queen Mary is a member of the Disability Confident Employer Scheme at Disability Confident Committed (Level 1). Therefore, we seek to go above and beyond our statutory duties in fostering an inclusive and accessible environment for all.

9. Role and responsibilities: Staff members

- 9.1. Staff wishing to access and benefit from a reasonable adjustment do not need to disclose the nature of their disability or provide evidence/diagnosis; rather, they must:
- Identify, and/or support the identification, of specific barriers impacting the delivery of their duties/role (Occupational Health Service may support here).
 - Engage with their line manager and reach an agreement (with their manager) setting out which adjustments are reasonable and will be implemented.
 - Agree with their line manager how to communicate the adjustment(s) to relevant colleagues who may need to be aware in order to change their practice or service.
 - Support the review of the reasonable adjustment and its impact to address the

barriers identified.

- Actively support the return (or cessation) of equipment and subscriptions provided as a reasonable adjustment when these are no longer required.

9.2. Colleagues are encouraged to initiate conversation with their line manager at the earliest practicable opportunity in order to maximise the benefits of adjustments (and minimise the negative impact of barriers). It is not mandatory for colleagues to consent to an Occupational Health referral, or for an Occupational Health report to be shared with your manager. However, this referral and report is often a key source of advice and guidance for line managers in performing their role to support staff.

10. Roles and responsibilities: Line managers

10.1. While most discussions about reasonable adjustments will be initiated by staff, managers may also begin these conversations when appropriate and sensitive. If a colleague is experiencing a barrier to meet their duties, the manager will address the matter sensitively and consider whether adjustments may be appropriate.

10.2. Where a colleague has made a disclosure of a disability, or barrier, an anticipatory approach must be adopted. Managers must:

- Support and anticipate the identification of a barrier to staff in their role.
- Identify, and/or support the identification, of specific barriers for staff (Occupational Health Service may support here).
- Support the identification of specific adjustments that directly address the barriers identified (Occupational Health Service may support here).
- Determine whether the identified adjustments address the barriers identified and will make a difference to the colleague.
- Determine whether the identified adjustments are reasonable to implement.
- Reach an agreement with the colleague setting out which adjustments are reasonable and will be implemented.
- Provide a clear basis and rationale to the colleague if an adjustment is determined to not be reasonable or necessary.
- Agree with the individual how to communicate the adjustment(s) to relevant colleagues who may need to be aware in order to change their practice or service.

- Engage relevant services and advice to implement and procure the adjustments and maximise benefit from affordable purchasing and alignment with other Queen Mary policies and procedures.
 - Evaluate the reasonable adjustment(s) and its impact to address the barriers identified – this may include review dates as part of the Attendance Policy and Procedure.
 - Oversee the return (or cessation) of equipment and subscriptions provided as a reasonable adjustment when these are no longer required.
- 10.3. Line managers have a duty to initiate a conversation if a colleague is appearing to be facing a barrier in their role due to a disability or long-term condition. Line managers should therefore aim to be proactive in spotting the signs of when an adjustment might be needed and having supportive conversations with employees. The duty to make adjustments rests with the employer so line managers must have proactive conversations with all of their reports.
- 10.4. Line managers may choose to seek expert advice to inform decisions to reach an evidence-based assessment; please refer to [Queen Mary's Disability Inclusion in the Workplace Hub](#).

11. Roles and responsibilities: Job applicants

- 11.1. Job applicants wishing to access and benefit from a reasonable adjustment do not need to disclose the nature of a disability or provide evidence/diagnosis; rather, they must:
- Identify specific barriers to themselves throughout the recruitment process,
 - Request specific adjustments that directly address the barriers identified via the recruitment and selection process.
- 11.2. Adjustments shared as part of Queen Mary's recruitment and selection processes do not automatically transfer into employment; following an offer of employment, individuals will refer to responsibilities as a staff member outlined in this policy.

12. Roles and responsibilities: Hiring managers

- 12.1. Hiring Managers are responsible for leading and managing inclusive and accessible recruitment and selection processes; more information can be found in our [Recruitment and Selection Policy](#).
- 12.2. Similar to line managers, hiring managers have an anticipatory and proactive duty to offer and identify adjustments. Regarding Reasonable Adjustments, hiring managers must:
- Give due consideration to applicant adjustment requests.

- Determine whether the identified adjustments are reasonable to implement.
 - Provide a clear basis and rationale to the applicant if an adjustment is determined to not be reasonable or necessary.
 - Engage relevant services and advice to implement the adjustments.
- 12.3. Hiring managers may choose to seek expert advice to inform decisions to reach an evidence-based assessment; please refer to [Queen Mary's Disability Inclusion in the Workplace Hub](#), for further advice and guidance contact your [HR Recruitment Administrator](#).
- 12.4. Where an applicant is made an offer, the onboarding process is an opportunity for hiring managers to engage in an anticipatory conversation about the staff member's needs and evaluate what adjustments from the recruitment and selection process, if any, might become working practice.

13. Monitoring adjustments and continuing our commitment throughout employment

- 13.1. The nature of support required can evolve, therefore the monitoring of reasonable adjustments helps ensure adjustments in place remain effective and identifies whether any changes are needed. Reviews also support line managers in planning and managing adjustments. However, either the staff member or the line manager can request a further review at an appropriate time - for example, if a staff member feels their adjustment need to be updated if circumstances, barriers, or needs have changed.
- 13.2. Where staff move roles within Queen Mary, previously identified and agreed reasonable adjustments will be reassessed based on the suitability for the new role and honoured, where applicable and reasonable, by the new line manager. Changes could include secondments, redeployments, and internal recruitment. Queen Mary operates an Equality Analysis Framework to support change leaders to manage these transitions, identifying and mitigating equality impacts.
- 13.3. Where a staff member changes line manager but remains in the same role, any reasonable adjustments agreed with the previous line manager will continue to apply and remain in place. Discussions can be held to ensure agreed reasonable adjustments are honoured and reviewed.

14. Raising concerns and appeals

- 14.1. In all cases where a decision is made not to implement an adjustment, the line manager will be required to explain their decision in writing addressed to the

colleague making the request. The line-manager will also demonstrate that they have explored every reasonable option and may propose more reasonable solutions and compromises.

14.2. If a staff member has concerns about:

- An outcome or decision as to whether an adjustment is reasonable,
- The progress of implementing a reasonable adjustment,
- A disparity between a decision made to offer an adjustment and the delivery,

They must first request a follow-up meeting with their line manager to discuss their concerns.

14.3. If the staff member remains dissatisfied with the decision or outcome, they can appeal by contacting a more senior manager in the School/Institute/Department, directly following the line management chain, who will review the appeal. Following this, if concerns persist the staff member must address their concerns to the relevant Employee Relations Manager in the Human Resources Department, who will seek a resolution and may follow [Queen Mary's Grievance Resolution Policy and Procedure](#).

15. Review

15.1. This policy will be reviewed at least every three years.

15.2. Minor updates to this policy that do not affect the rules, principles or intent of this policy may be approved by the Director of Human Resources and a relevant Senior Executive nominee (typically the Chair of the Equality, Diversity and Inclusion Steering Group) on behalf of the Senior Executive Team (SET).

Policy Information and Document Control

Policy title	Reasonable Adjustments Policy
Version number	1.0
Related policies and procedures	Recruitment and Selection Policy Attendance Policy and Procedure Flexible Working Policy Capability Policy and Procedure Queen Mary's Employee Assistance Programme Access to Work
Superseded policies	None
Approval level	Senior Executive Team
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Effective date	TBC
Next review due	<i>3 years from approval</i>
Policy owner	Director of Human Resources
Policy contact	Employee Relations Policy and Projects Manager

Version Control

Version	Date	Reason for updates/Summary of key changes