



HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE

Response Date:07/05/2024

2024/464 - Neurodiversity

In response to your recent request for information regarding;

Would it be possible to have the following information please?

**Does NWP currently have a policy in relation to supporting individuals that are neurodiverse
I.e dyslexia, dyspraxia, autism ADHD etc?**

If so, could I have a copy?

Please find attached.

How many officers and staff currently have one of the above conditions?

What % of staff have one of the above conditions?

NWP	Headcount
Officer	1735
Police Staff	1247

Condition	Officer	Police Staff
ADHD		1
Autism	1	1
Dyslexia	2	
LEARNING	1	
Learning		
Difference	59	16
Mental Health	18	15
Sensory	5	6
Grand Total	86	39

THIS INFORMATION HAS BEEN PROVIDED IN RESPONSE TO A REQUEST
UNDER THE FREEDOM OF INFORMATION ACT 2000, AND IS CORRECT AS AT 02/05/2024



**HEDDLU
GOGLEDD CYMRU
NORTH WALES
POLICE**

Working with Disability Policy

Governance:	Senior Leadership Team		
Document Type:	Policy		
Policy Owner:	Head of People and Organisational Development		
Department:	People and Organisational Development		
Policy Writer:	Human Resources		
Policy Number:	026	Version:	1.1
Effective Date:	31/07/2023		
Recommended Review Date:	31/07/2026		

POLICY

CHANGE HISTORY				
Version No	Author	Changes	Ratification	Date
1.0	Annalee Morris, Corporate HR Lead	Changed from Practice Guide back to a Policy	SLT	25/07/23
1.1	FG&PO	Updated hyperlinks section 10.3 and 13.3	N/A	09/01/24

CONTENTS

1. WHY IS THIS POLICY REQUIRED?	2
2. WHO SHOULD USE THIS POLICY?	2
3. ROLES AND RESPONSIBILITIES	2
4. WHAT IS A DISABILITY?	3
5. WORKPLACE ADJUSTMENTS.....	4
6. LANGUAGE	5
7. THE PROCESS OF AGREEING ADJUSTMENTS	5
8. WHAT ARE 'REASONABLE' ADJUSTMENTS?	6
9. POTENTIAL DISABILITY/HEALTH CONDITIONS REQUIRING ADJUSTMENTS	7
10. SUPPORT AVAILABLE	7
11. SUNFLOWER SCHEME – HIDDEN DISABILITIES	8
12. DISABILITY CONFIDENT SCHEME	9
13. DISABILITY BY ASSOCIATION	9
14. SHARING PERSONAL INFORMATION	10
15. CONSIDERATION OF REDEPLOYMENT	10
16. UNFAIR TREATMENT	11
17. DECLARATION & LEGALITIES.....	11
18. USEFUL RESOURCES	12

1. WHY IS THIS POLICY REQUIRED?

- 1.1 North Wales Police are committed to valuing and respecting difference and understanding that people have different needs. We all have a responsibility to uphold the principles of the Equality Act 2010 and treat everybody in a fair and respectful manner. The NPCC Diversity, Equality and Inclusion Strategy has further set an objective to advance equalities by ensuring an inclusive and supportive workplace. The goal is to encourage a culture where people feel able to be open about their health conditions, impairments, disabilities and differing needs and to feel valued as an individual for their skills and contribution to the police service.
- 1.2 This Policy sets out the Force's commitment to every disabled individual, encouraging a proactive approach at every level. It provides guidance for managers and clarifies the support framework that exists to ensure equality of treatment. The primary aim of the Policy is to ensure every existing or potential member of staff has the opportunity and the appropriate resources to perform their role to the best of their ability.
- We value people and want to enable them to make their best contribution to the Force.
 - We want to create a positive and inclusive working environment.
 - We want to remove the barriers to equality to enable full participation.
 - We want to recognise what can be achieved by people rather than what can't.
 - We want to reflect our communities and enhance the service we provide by increasing our understanding of disability.
- 1.3 Consideration should be made to the requirements of the Equality Act 2010, which protects disabled individuals from discrimination and requires employers to make reasonable adjustments in relation to the working environment.
- 1.4 This Policy has also taken into account the College of Policing [Discovery Report into Workplace Adjustments 2021](#)

2. WHO SHOULD USE THIS POLICY?

- 2.1 This Policy applies to all members of NWP including Police Staff, Police Officers, Special Constables, Volunteers. It also applies to Office of the Police and Crime Commissioner (OPCC) staff. Any reference to staff in this Policy will include NWP and OPCC staff.

3. ROLES AND RESPONSIBILITIES

3.1 Line Managers	• Support all individuals (regardless of any formal identification of a disability) to achieve their best and make adjustments where possible to achieve this aim. • Comply with the duty under the Equality Act to make 'reasonable adjustments' for people with a disability if there are any aspects of a job or workplace which put them at a disadvantage. • Be respectful in the language used about disability and expect the same of others. • Assess the operational impact of any adjustments required. • Complete the Workplace Adjustments Passport with the individual, if required.
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	• Regularly review adjustments with the individual to discuss whether or not they are still appropriate. • Seek to identify signs that an individual might have a disability or health condition that is making it difficult for them to do their job and therefore may require adjustments. • Ensure all sensitive personal data provided to the Force is processed in accordance with UK GDPR Principles.
3.2 Individual Members of Staff / Officers	• There is no requirement for individuals to give specific details of their disabilities but managers do need to know the effect of the disability and what support is required. • Participate in regular reviews of adjustments with the Line Manager. • Share ideas about any adjustments you know (or believe) will assist you. • Give honest feedback about how effective existing adjustments are.
3.3 Human Resources	• Help to ensure that the requested adjustment(s) is/are assessed and implemented if reasonable, involving other departments or external agencies if required. • Help to identify potential external organisations with specialist knowledge to seek advice regarding work-based assessments and supportive equipment. • Signpost individuals and managers to any other internal and external support available.
3.4 Occupational Health	• Provide advice on workplace adjustments and accommodations.

4. WHAT IS A DISABILITY?

4.1 The Equality Act 2010 states that a person has a disability when:

A person has 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.

‘Long-term’ means that the condition must last, or be likely to last, for more than 12 months, or is likely to last for the rest of the life of the person affected.

‘Substantial’ means more than minor or trivial and goes beyond the normal differences in ability which may exist between people.

4.2 The definition of ‘disability’ is very broad. Many conditions could potentially be covered including, for example, depression, chronic fatigue syndrome, arthritis, diabetes, epilepsy, dyslexia, menopause. Individuals with cancer, multiple sclerosis or HIV/AIDS would be covered from the date of diagnosis regardless of the impact the condition is having on their life at the time of diagnosis.

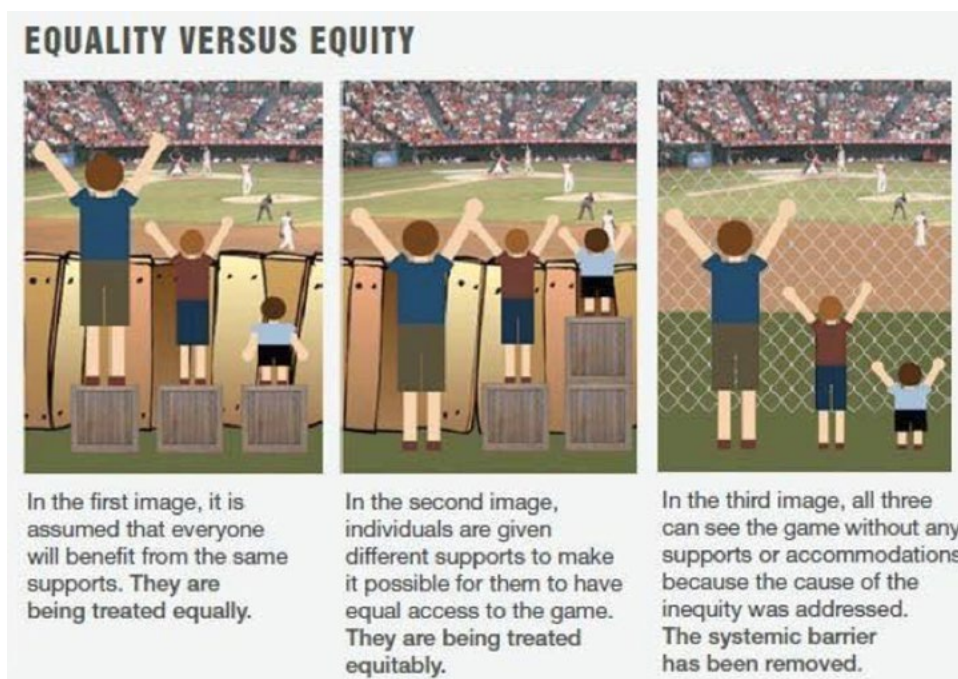
4.3 Whilst the examples provide some guidance in terms of what is and isn’t a disability, **North Wales Police aim to support all individuals (regardless of any formal identification of a disability) to achieve their best and will make adjustments where possible to achieve this aim.**

4.4 To be covered under the Equality Act, a condition does not have to be clinically recognised or diagnosed. Employers should focus on the effects the individual is experiencing at

work, not on the disability or condition from which those symptoms may emerge. Many people with a long-term health condition which could potentially be covered by the Act may not necessarily identify as or consider themselves to be 'disabled', even though they may still need adjustments to support them in the workplace. In practice, this means that employers may need to make adjustments for employees who do not say or think they are 'disabled'.

5. WORKPLACE ADJUSTMENTS

- 5.1 The Force is committed to strengthening the trust and commitment of all communities served and developing and investing in its people. On this basis, we are committed to valuing difference and recognising that individual needs will vary.
- 5.2 Equality of opportunity is not about treating everyone the same but rather treating people equitably dependant upon their individual needs. Although unintentional, we recognise that some workplace practices or physical aspects of the working environment can be challenging for people with disabilities. We are committed to identifying any such challenges that could place a disabled person at a disadvantage, then taking all reasonable steps to remove those barriers. This is illustrated by the pictures below.



Credit: Original author unknown

- 5.3 Employers have a duty under the Equality Act to make 'reasonable adjustments' for people with a disability if there are any aspects of a job or workplace which put them at a disadvantage. An employer failing to make 'reasonable adjustments' for a disabled job applicant or employee is one of the most common types of disability discrimination.

6. LANGUAGE

- 6.1 Disabled people will often have different preferences and views on what language they find appropriate or inappropriate. If you are unsure about how to say something, ask the person what they would prefer.
- 6.2 Be respectful in the language you use about disability, and expect the same of others, whether a disabled person is present or not.
- 6.3 The Equality Act 2010 refers to the requirement to make 'reasonable adjustments'. The College of Policing Discovery Report into Workplace Adjustments 2021 recommends that Forces use the term 'workplace adjustment' in place of 'reasonable adjustment'.

7. THE PROCESS OF AGREEING ADJUSTMENTS

It is essential that Line Managers do not make assumptions about disabled people. Disabilities will often affect different people in different ways and their needs may be different as well. The focus must also remain on what each individual **can** do, rather than what they cannot.

The attached flowchart summarises the process for considering and implementing workplace adjustments:



Workplace
Adjustments process

7.1 What are the individual's needs?

Once it is known that an individual has a disability or an issue with which they require support, listening carefully and finding out what the individual requires will help to meet the organisation's obligations by identifying the best way of meeting that person's needs.

7.2 What is the effect of a disability?

There is no requirement for individuals to give specific details of their condition, impairment or disability but managers do need to know the effects so that they can understand what support is required. Managers should also assess the operational impact of any adjustments required.

7.3 Recording the individual's requirements

The Workplace Adjustments Passport should be completed wherever possible as this allows the individual to inform their Line Manager of their requirements and what adjustments they may need to be supported in work:



Workplace
Adjustments Passpor

The form also allows the Line Manager to identify the impact in the workplace of a disability and any possible risks to mitigate. This may prompt the requirement for a Risk Assessment to be agreed, particularly in circumstances where an individual is a lone worker, or where their disability/medical condition may place them at additional risk when carrying out their role. Risk Assessment templates can be found [here](#).

An embedded document will outline the adjustments agreed without the detail in the rest of the form. Individuals can use this document as confirmation of adjustments if they are working somewhere temporarily, for example, and do not wish to disclose further detail. Individuals may also choose to share this condensed document with their colleagues; it must not be shared without the individual's consent.

Workplace adjustments can include:

- A more flexible working arrangement, for example, allowing someone to work from home or changing their hours so they don't have to travel to work in the rush hour.
- Arranging more one-to-one supervision or additional training or providing a mentor.
- Making a physical change to the workplace or workstation, for example, changing a desk height, or moving office furniture to improve access.
- Providing extra equipment or assistance, for example, a new chair or specific software.
- Altering assessment procedures – such as giving extra time, providing assistive technology or offering a 'work trial' instead of a traditional formal interview.

7.4 Agreeing Adjustments

Once the Workplace Adjustments Passport form has been completed, the Line Manager should liaise with the relevant HR & Training Support Officer (HRTSO) before confirming the adjustments. The HRTSO will help to ensure that the requested adjustment is assessed and implemented if reasonable and will involve other departments (e.g. Occupational Health) or external agencies if required.

An individual can also seek advice from external organisations with specialist knowledge regarding work-based assessments and supportive equipment. The relevant HRTSO can help identify potential organisations considering cost and who is best placed to assist.

7.5 Reviewing Adjustments

An individual's needs may change and therefore it is important that an individual requiring adjustment(s) has a regular review with their Line Manager to ensure their adjustments remain relevant. This may be required following a job change, absence from work or review by the GP/consultant. The review also enables the Line Manager to ensure an individual is being developed and making use of their abilities. This process should be carried out with sensitivity, particularly when it is clear that the member of staff/officer continues to work effectively. The Workplace Adjustments Passport form can be used for any subsequent reviews. As a minimum, a review should take place on an annual basis.

7.6 Case Review

The Force holds a monthly Case Review, which is a multi-disciplinary group comprising HR, Occupational Health, Federation, and UNISON. The purpose of the panel is to provide consistency in decision making on matters relating to workplace adjustments and, where this involves a cost (such as paying for testing or equipment), to record such details accurately against the Force budget. HRTSOs will refer cases involving costs to this panel at the earliest opportunity.

8. WHAT ARE 'REASONABLE' ADJUSTMENTS?

- 8.1 The Equality Act 2010 protects disabled individuals from discrimination and requires employers to make reasonable adjustments in relation to the working environment. Reasonable adjustments are a way of levelling the playing field for people with disabilities. When considering adjustments, Line Managers should identify the barrier

that is caused by the effect of the disability or condition and make an adjustment to remove it.

8.2 The duty to make reasonable adjustment applies where any physical feature of the employer's premises, or any employment arrangements made by or on behalf of the employer, cause a substantial disadvantage to a disabled person compared to a non-disabled person.

8.3 A number of factors are likely to have a bearing on whether it is 'reasonable' to make an adjustment:

- How effective the adjustment is in preventing the disadvantage.
- How practicable it is.
- Its financial and other costs and how disruptive it is.
- The employer's financial and other resources.
- The availability of financial or other help.
- An adjustment will not be reasonable if it compromises anyone's health and safety.

All these factors should be considered and recorded when reasonable adjustments are requested.

8.4 It is lawful to decline a request for an adjustment which is deemed unreasonable. The burden of proof is with the employer to show why an adjustment is unreasonable. Because the potential consequences of refusal are significant, Line Managers should not refuse any request for an adjustment without first seeking the advice of their HR & Training Support Officer (HRTSO). Any such cases should then be referred to Case Review (see point 7.6 above).

9. POTENTIAL DISABILITY/HEALTH CONDITIONS REQUIRING ADJUSTMENTS

9.1 Line Managers should be proactive in seeking to identify signs that an individual might have a disability or health condition that is making it difficult for them to do their job and therefore may require adjustments. These signs might include (but are not limited to):

- Being persistently late.
- Poor or deteriorating relationships with colleagues.
- A negative attitude.
- Poor written or oral communication.
- Missing deadlines or forgetting to do work.
- Irritability or moodiness.
- Lots of short-term sickness absences.
- Long periods of sickness absence.
- Complaints of being tired or in pain.

9.2 If the Line Manager has any concerns they should approach the individual in a sensitive manner and discuss their concerns directly with the individual. This might confirm that adjustments are required in relation to a disability or health condition, or might indicate that there are other issues which may require support through other policies.

10. SUPPORT AVAILABLE

10.1 NWP Disability Support Network (DSN)

The DSN works together as North Wales Police, leaders and individuals, to support those affected by disability, ensuring they remain included, treated fairly and able to fully apply their diverse abilities to serve our communities. Further details can be found by clicking [here](#).

10.2 NWP Equality Diversity & Inclusion (EDI) Unit

There is a variety of useful information available on the EDI Unit document library which covers disability in general and guidance on specific disabilities. There is also a particularly useful guidance section for Line Managers. Further details can be found by clicking [here](#).

10.3 NWP Health and Wellness Centre (Occupational Health)

Supporting individuals with mental health issues is a priority for the Force. According to MIND at least one in four individuals will experience a mental health problem each year. The individual's own GP should be the first point of contact for support; Line Managers and HR can also provide help and reassurance. The Force can also provide support through the Health and Wellness Centre, further details of which can be found by clicking [here](#). The Health and Wellness Centre can provide support for physical as well as mental health issues.

10.4 Disabled Police Association (DPA)

The DPA are the national body representing disability support networks from police forces across the UK. Their main aim, and a key part of their strategic vision is to promote equality of opportunity for disabled people working within the extended police family. Their website can be access by clicking [here](#).

10.5 National Police Autism Association (NPAA)

The NPAA is an independent group supporting police officers, staff and volunteers who are affected by neurodivergent conditions such as autism (including Asperger syndrome), dyslexia, dyspraxia and ADHD. Their website can be access by clicking [here](#).

10.6 Disability Related Leave

Disability Related Leave can be requested via Line Managers in order to take time off during working hours for therapy, hospital appointments, rehabilitation, assessment or treatment. Please refer to the [Duties & Leave Policy](#) for the details for Police Officers and the Police Staff Conditions of Service – [Leave for Police Staff](#)

10.7 Disability Related Sickness Absence

Sickness absence in relation to a disability is recorded as such on the individual's personal record but may not be counted towards any procedural triggers in terms of absence management. Please refer to the [Attendance Management Policy](#) for further details.

11. SUNFLOWER SCHEME – HIDDEN DISABILITIES

11.1 What is a Hidden Disability?

A hidden disability is a disability that might not be immediately obvious. Hidden disabilities don't have physical signs and include learning difficulties, mental health issues, as well as mobility, speech, visual or hearing impairments. They can also include asthma, COPD, and other lung conditions as well as chronic illnesses such as renal failure, diabetes, and sleep disorders when those diseases significantly impact day-to-day life.

Living with these conditions can make daily life more demanding for many people. They affect each person in different ways and can be painful, exhausting, and isolating. Without visible evidence of the hidden disability, it is frequently difficult for others to acknowledge

the challenges faced and as a consequence, sympathy and understanding can often be in short supply.

11.2 What is the Sunflower Scheme?

In 2016 London Gatwick Airport designed a lanyard to be a subtle but visible sign to enable airport staff to identify that the wearer or someone with them had a hidden disability. Staff would know they may require some extra help, time, or assistance when moving through the airport.

The Hidden Disabilities Sunflower has now been adopted globally. It has increased awareness of the challenges individuals with hidden disabilities can face. It has developed to offer a range of different lanyards, cards pins, clothing and more.

- 11.3 Individuals who feel they would benefit from the scheme can request the most suitable item(s) from what is available. Requests can be made by emailing Disabilitysuppnetwork@northwales.police.uk or a Sunflower Supporter. Further details can be found by clicking on this [link](#).

12. DISABILITY CONFIDENT SCHEME

- 12.1 North Wales Police have signed up to the Disability Confident Scheme, which shows we make five commitments:

- Inclusive and accessible recruitment.
- Communicating vacancies.
- Offering an interview to disabled people who meet the minimum criteria for a job vacancy.
- Providing reasonable adjustments.
- Supporting existing employees.

- 12.2 These commitments have been integrated into the relevant policies and procedures. This includes providing reasonable adjustments during recruitment and promotion processes (see the [Recruitment Policy](#)) and ensuring all individuals have access to training and that training events address any potential disadvantages to any protected group (see the [Learning and Development Framework](#)).



13. DISABILITY BY ASSOCIATION

- 13.1 Discrimination can also take place because of a protected characteristic that a person does not personally have. For example, a person can be discriminated against because of their association with a person who has a disability, or because they are wrongly perceived to have one, or are treated as if they do.
- 13.2 Discrimination by association occurs when a person is treated less favourably because they are linked or associated with a protected characteristic. The person does not have the protected characteristic but they are treated less favourably than others because of a protected characteristic of a friend, spouse, partner, parent or another person with whom they are associated.

- 13.3 All employees of the Force who are associated with someone who has a disability must be treated with sensitivity integrity, fairness and respect. Reasonable adjustments should be considered by Line Managers to support individuals with caring responsibilities.

Caring responsibilities is defined as:

A carer is anyone, who looks after a family member, partner or friend who needs help because of their disability, who cannot cope without their support. The care they give is unpaid.

The Parents and Carers Support Network can provide further support. Details can be found by clicking [here](#).

14. SHARING PERSONAL INFORMATION

- 14.1 Whilst officers and staff are not mandated to share information about their disability to Line Manager or the Force in general, we would encourage this for the following reasons:

- It allows NWP to provide better resources, facilities and support for our officers and staff.
- It gives scope for prompting a discussion about workplace adjustments or other support, as required.
- It also enables officers and staff to receive targeted information about support or positive action initiatives, such as development programmes for officers and staff from under-represented groups.
- It contributes to a pool of robust data and evidence that will help the Force meet the diverse needs of officers and staff.
- Officers and staff may also receive increased legal protection by sharing personal information. In many cases, the Force may be placed under an increased obligation to protect officers and staff from discrimination if it has received disclosure information from an officer or staff member – for example, about their disability status – or if it holds broader evidence of the diversity of its workforce.

- 14.2 Any sensitive personal data provided to the Force will be processed in accordance with UK GDPR Principles. Details about an individual's disability will be treated confidentially and used only to help in the management of the individual. Such details should only be disclosed where strictly necessary and managers must inform the individual prior to doing so. In practice it is usually only information regarding individual requirements for workplace adjustments that need to be disclosed.

- 14.3 For monitoring purposes, information will be gathered by the Force to ascertain the profile of staff and applicants with a disability. One way in which we use this information is in the annual [Employment Monitoring Report](#). This provides general statistical information to the public on diversity and disability within the Force, without disclosing any personal data.

15. CONSIDERATION OF REDEPLOYMENT

- 15.1 Where an officer becomes restricted/disabled as a result of an injury or medical condition the Force should make reasonable adjustments to facilitate retention in their current post. If this is not possible use of the Limited Duties process should be considered, with the possibility of redeployment of the officer to another role if the condition warrants such a move. As a final resort, consideration may be made as to possible ill health

retirement or consideration of applying formal procedures for unsatisfactory performance and/or attendance.

- 15.2 It is important to note that an officer who is permanently disabled from the ordinary duties of a police officer may not meet the definition of disability under the Equality Act 2010. The physical requirements for the ordinary duties of a police officer are such that a condition may prevent an officer from undertaking a full operational role, although there is no long-term adverse effect on ability to partake in day-to-day life.
- 15.3 Where a member of staff can no longer undertake the full range of duties relating to their substantive post because of a disability, the Line Manager should make reasonable adjustments and, where necessary and where appropriate, arrange for referral to the Occupational Health Unit. If Occupational Health form the view, based on medical prognosis, that even after considering adjustments an individual can no longer carry out the duties of their substantive post then the appropriateness of medical redeployment should be discussed with the HRTSO. Should it prove impracticable to redeploy an individual to a suitable alternative post, then ill health retirement or termination of employment on the grounds of capability will be considered.

16. UNFAIR TREATMENT

- 16.1 Any individual who feels aggrieved about their treatment on the grounds of their disability can seek support from their staff association, trade union and/or the Disability Support Network.
- 16.2 Individuals can also seek to address this via the [Grievance Resolution Policy](#) or [Appeals Policy](#).

17. DECLARATION & LEGALITIES

- 17.1 In line with all Force policies, the overarching purpose of this document is to directly support the PCC police and crime plan objectives. Overall the intention of this policy is to make North Wales the safest place in the UK.
- 17.2 In the writing of this policy cognisance has been taken of the College of Policing Code of Ethics (2014).
- 17.3 North Wales Police policies will be written in accordance with the approved corporate format and published on the Force Intranet, allowing access to staff and public, where appropriate, on the pages of the public facing Internet site under the Force publication scheme and Freedom of Information Act 2000.
- 17.4 The following main legal requirements have been identified within this policy:
- Equality Act 2010
 - Human Rights Act 1998
 - The Welsh Language (Wales) Measure 2011 and the Welsh Language Standards for the Chief Constable
 - Data Protection Act 2018
 - Freedom of Information Act 2000
 - Health and Safety Act 1974

- 17.5 This policy has been written giving due regard to the above legislation and has considered the risk of unfair and/or disproportionate impacts on individuals or groups (actual or perceived) and has done so via an equality impact assessment (EIA).
- 17.6 New legislative requirements or changes in Force structure may necessitate a review of this policy document.

18. USEFUL RESOURCES

The Diversity Unit Document Library	There is a particularly useful guidance section for Line Managers.
Disability awareness factsheets – Maximus  A-Z-disability-guide -booklet-for-employ	Maximus (previously Remploy) have produced a Disability Guide providing practical advice for employers on supporting people with a range of disabilities in the workplace. They also have awareness factsheets on a range of disabilities and health conditions
Employing people: workplace adjustments Equality and Human Rights Commission (equalityhumanrights.com) http://www.equalityadvisoryservice.com/	The Equality and Human Resources Commission has a guide on 'Employing people: workplace adjustments' The Equality, Advisory and Support Service offers support for individuals and employers in relation to equality and dealing with inequality.
https://www.gov.uk/access-to-work/overview	View this webpage for a guide to Access to Work including eligibility, what you'll get and how to claim.