

Reasonable adjustment policy:

**Our commitment and
approach to providing
reasonable adjustments
for our customers**



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Purpose

As a public authority and service provider the ICO has a legal duty to ensure that our service provision is inclusive and anticipates the needs of protected groups. We recognise that we must take reasonable steps in the way we provide our services and engage with disabled customers. The purpose of this policy is to set out the process for making reasonable adjustments and to remove or reduce the effect of those barriers, which create a substantial disadvantage to disabled people.

Our Equality Objectives set out a clear intent for the ICO to be inclusive and diverse, and the provisions in this policy are intended to be one strand towards our achievement of this objective.

Under the [Equality Act 2010](#), public authorities have to make reasonable adjustments in their approach or provision to ensure that services are accessible to disabled people as well as everybody else.

This policy does not seek to explain how we will approach every situation. It is intended to confirm our commitment to improving accessibility for everybody that we deal with. It also sets out the factors that we take into account in dealing with requests from customers for reasonable adjustments.

This policy applies to all ICO customers.

What is a reasonable adjustment?

A reasonable adjustment involves making a change to the way that we usually do things to ensure that we are accessible to all of our service users. This may involve:

- departing from our usual practice in the way we do things, if we find that the current position places that person at a substantial disadvantage. For instance, allowing more time than we usually would for someone to respond or provide information; or
- providing information in a different format.

We will not make assumptions about whether a disabled person requires any adjustments or about what those adjustments should be. We will discuss the requirements with the person concerned and seek to reach agreement on what may be reasonable in the circumstances.

Requesting reasonable adjustments

The ICO will let people know that we can provide reasonable adjustments by:

- publishing this policy on our website;
- asking people directly in the first communication that we have with them if they have a disability and might need any adjustments;
- including a note on our published documents indicating that we can provide the document in an alternative format on request;

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- working with key representative groups and others to raise awareness of this policy; and
- including a clear note on a relevant record that alerts staff to a reasonable adjustment.

Types of reasonable adjustments we can offer

Whilst we will consider each request for reasonable adjustments individually, there are some common adjustments which we will offer as a matter of course. There are also some other adjustments that we can make particular arrangements to provide.

We will always agree the adjustments with the person concerned to avoid making incorrect assumptions about a person's needs.

Some examples of the simple reasonable adjustments that staff can make include:

- providing documents or correspondence in a larger font size;
- providing documents on coloured paper or with a specific colour contrast, which can often help people with conditions such as dyslexia;
- allowing a person who has a learning disability or experiencing poor mental health more time to provide further information - except where there is a statutory deadline which we have no power to change;
- using email or the telephone rather than hard-copy letters where appropriate, which may assist those with a vision impairment;
- speaking clearly to the people who we deal with and offering additional time to cover the issues they need to discuss - this will help everyone understand our processes and procedures; and
- using plain language appropriate to the person we are dealing with and avoiding jargon.

Some other arrangements that we can provide include:

- translating documents or correspondence into Braille;
- communicating with people through their representative or advocate, if requested and approved by them, [as referenced in the Mental Capacity Act](#)
- helping someone who is experiencing poor mental health to understand and manage the action we are taking by arranging a single point of contact within the ICO; and
- providing access to an 'Easyread' service for those with a learning disability.

Some requests may require more detailed consideration and we discuss our approach to these requests in the next section.

Our response to requests for reasonable adjustments

In the majority of cases we will be able to agree and deliver the required reasonable adjustments with a minimum of delay.

In some cases, we may need to consider in more detail how best to overcome the difficulty a disabled person may be experiencing. For example, where the adjustment requested may be difficult to provide or where it may interfere with our statutory or regulatory obligations.

How do we decide what is "reasonable"?

The Equality Act does not define what is "reasonable". Guidance from the Equality and Human Rights Commission suggests that the most relevant factors are:

- Will the adjustment help in overcoming the difficulty that the disabled person may have?
- How practical is it to provide the adjustment?
- What are the resource implications of making the adjustment?
- How much will it cost and is this proportionate to the adjustment being requested?
- Would the adjustment cause disruption to others? For example, it would not usually be reasonable for a case worker to drop all other cases and devote all their time to one person, as others would inevitably suffer. The amount of extra time provided must therefore be "reasonable" in all the circumstances.

Monitoring

We will record and monitor the reasonable adjustments that have been requested and made. This will allow us to review the services we provide and help us identify whether there are any other steps that we can take to improve our services.

Dealing with complaints about our service

The ICO is committed to providing a high standard of service, dealing with everyone in a way that is fair and free from discrimination. If someone is dissatisfied with the arrangements we have made for providing reasonable adjustments, we will respond in accordance with our Service Complaints Policy.

[Further information about our Service Complaints Policy can be found here.](#)