

Disability Policy

Disability Policy

1. Introduction

- 1.1. LSE (hereafter 'the School') is committed to providing and developing a positive, supportive and enabling environment for all staff, including staff with disabilities. This policy builds upon this commitment in the context of the Equality Act 2010, which places a general duty on all higher education institutions to promote inclusion and disability equality. Under these duties, the School is required to:
 - Promote equality of opportunity for disabled people.
 - Promote positive attitudes towards disabled people.
 - Involve disabled people in the formulation of actions.
 - Encourage participation by disabled people in public life.
 - Meet disabled people's needs, including additional measures to enable them to work on an equal basis as non-disabled people.
 - Eliminate unlawful discrimination.
 - Eliminate harassment of disabled people.
 - Identify and analyse policies, practices and procedures that are potentially discriminatory.
 - As part of its Public Sector Equality Duty, reflect in its policies and procedures that disabled people's needs may be different from those of non-disabled people.
- 1.2. This policy sets out the responsibilities that apply to different individuals to ensure a supportive environment for disabled individuals. In addition to the responsibilities that sit with line managers and certain functions, the policy also details how the School's Disability and Mental Health Adviser role provides confidential guidance to staff and managers as well as coordinating key areas to ensure that reasonable adjustments and other support are provided in a timely and appropriate manner.
- 1.3. This policy is accompanied by an Equality Impact Assessment (EIA) which aims to identify the policy's impact in terms of protected characteristics as well as ways in which any negative impact may be mitigated. Further details on the School's EIA process can be found on the [EDI webpages](#).

- 1.4. This policy is supported by guidance for staff and managers which clarifies the process within the School for agreeing, implementing and reviewing reasonable adjustments. In the instance of a conflict between this policy and the supporting guidance, the policy should take precedence. At all times, a fair and reasonable approach should be taken which focuses on solutions to support the employee in their role.

2. Policy aims

This policy aims to:

- 2.1. Set out the ways in which the School is committed to creating a positive and inclusive environment for people with a disability or long-term condition, both seen and unseen.
- 2.2. Outline the process by which individuals can share a disability and be supported through a process of implementing and reviewing reasonable adjustments.
- 2.3. Provide a framework to contribute to the ongoing development of an enabling environment by addressing some of the specific practical needs of disabled individuals and providing support (e.g. training) for staff and managers.

3. Policy scope

- 3.1. This policy and its supporting guidance apply to all School staff, whether salaried or hourly paid. Outside these staff groups, the School also has a duty of care – including a duty towards an inclusive environment as regards disability - to agency staff, contractors and other individuals on School business.
- 3.2. A separate policy exists for the School's student community. In addition to the provisions in this policy, staff who are also students can access confidential support and advice in relation to their student status via the [Disability and Wellbeing Service](#), as part of the School's commitment to an inclusive learning environment.
- 3.3. This policy should be read alongside other School policies that support a diverse, inclusive and respectful community, including:
 - The [Dignity at Work Statement](#) which applies to all School staff and clarifies expectations of behaviour, as well as setting out the means by which inappropriate behaviour which falls short of bullying or harassment can be easily identified, addressed and resolved.
 - The [Ethics Code](#) which sets out six core principles for behaviour that apply across the LSE community.
 - The [Discrimination, Harassment and Bullying Policy](#) which sets out the process by which staff (and other members of the School community) may take formal action if they feel that they have been subject to discrimination, harassment or other adverse treatment on the basis of disability.
 - The [Etiquette Policy for Email and other Online Communication Tools](#), which focuses on behaviours and etiquette when working and collaborating online.
 - The [Capability Health Policy and Procedure](#), which sets out the procedure to be followed where a health condition is having a long-term and/or continuous impact on an employee's performance and/or attendance.

- The [Safeguarding Policy](#), where an individual with a disability may also be considered within a vulnerable group.
- The [Fire Safety Policy](#), which sets out the arrangements for individuals with disabilities in the event of an evacuation.

4. Definition of disability

- 4.1. The Equality Act 2010 uses a definition of disability which includes but is not limited to those with physical or mobility impairments, visual impairments, hearing impairments, dyslexia, dyspraxia, dyscalculia, attention deficit (hyperactivity) disorder (AD(H)D), certain medical conditions, mental health conditions, autistic spectrum conditions, Chronic Fatigue Syndrome (CFS)/myalgic encephalomyelitis (ME) and other disabilities that may be 'unseen' (e.g. asthma, epilepsy, heart conditions, diabetes). The formal definition included in the Act is:

"A physical or mental impairment which has a substantial and long-term adverse effect on a person's ability to carry out normal day to day activities"

- 4.2. The definition of 'day to day activities' includes mobility, manual dexterity, lifting, hearing, eyesight, speech, memory, and the ability to concentrate, learn or understand. The Act defines 'substantial' as being more than trivial and 'long-term' as being more than 12 months or likely to last 12 months.
- 4.3. An impairment which would substantially affect a person, but which is controlled by medical treatment or other support¹, is still covered by the definition of disability. This includes cancer, HIV/AIDS and Multiple Sclerosis effectively from the point of diagnosis.
- 4.4. Conditions that are expected to be temporary (such as broken limbs) will not normally be considered a disability in themselves unless indicated otherwise by medical advice and evidence. At the same time, adjustments may be discussed and agreed locally, in consultation with relevant parties (e.g. HR) to ensure that the individual is supported in their role.
- 4.5. While acknowledging the medical definition of disability given above under the Equality Act 2010, in practical terms the School follows the social model of disability which focuses on addressing and removing barriers to participation among disabled individuals.

5. Policy responsibilities

- 5.1. In line with the Equality Act 2010, the School is committed to ensuring a supportive workplace environment for disabled individuals. As set out here, both line managers and certain functions within the School have important roles to play in ensuring that disabled staff are supported and enabled appropriately in their work.
- 5.2. Employees:

¹ Equality Act 2010, Schedule 1, Part 1, Paragraph 5

- Are encouraged to tell their line manager if they have a disability or long-term condition that is affecting them at work, so that the School can ensure that appropriate reasonable adjustments and/or other means of support are put in place.
- Are encouraged to share information about any ongoing or new disability-related issues that are impacting on their work so that reasonable adjustments and other support can be implemented.
- Have a role to play by treating everyone with dignity and respect, and in contributing towards an open and inclusive culture within their teams in which individuals feel comfortable sharing information about a disability (if they choose to do so).

5.3. Line managers are responsible for:

- Creating an open and inclusive culture that enables staff to feel comfortable to share a disability and request reasonable adjustments.
- Spotting the signs where it might reasonably be expected that an employee has a disability and/or might reasonably be expected that someone would need an adjustment.
- Taking timely and appropriate steps to support employees who have shared information about a disability, including the implementation and review of reasonable adjustments.
- When an employee shares that they have a disability, being open and receptive to the employee's needs, and seeking (and being open to) independent advice that can inform management of the condition in question, including reasonable adjustments.
- Seeking further advice in a confidential and appropriate manner (e.g. from their HR Partner) before making decisions that impact on a disabled employee, as well as if they are unsure how best to support a disabled employee.
- Attending relevant disability training to maintain up-to-date knowledge and awareness of disability issues.

5.4. The Disability and Mental Health Adviser is responsible for:

- Understanding the key responsibilities of respective areas that play a role in supporting disabled staff, and directing queries accordingly.
- Coordinating between Health and Safety, HR Partners and DTS in ensuring staff are provided with relevant equipment, technology and furniture following an OH appointment or Access to Work evaluation.
- Tracking specific cases and ensuring that the employee is kept regularly updated and informed of progress.
- Carrying out regular case reviews and reporting key themes to the Disability and Accessibility Steering Group.
- Escalating concerns regarding an individual case to the Director of Human Resources or, where necessary, the COO.
- Reviewing monthly caseload with the Director of Human Resources and COO.
- Providing confidential advice to staff and managers concerning disability support.
- Providing specialist support to HR Partners in addressing disability issues.
- Promoting best practice regarding disability support across the School.

5.5. Human Resources (HR) are responsible for:

- Providing appropriate advice and support to managers and employees.

- Seeking specialist advice (such as via an Occupational Health referral) as required to inform reasonable adjustments for disabled staff.
- Retaining, monitoring and reporting on disability data in confidence.

5.6. Other key services and their responsibilities include:

- Health and Safety for owning the design and process of workstation risk assessments, which inform more general support for staff (e.g. ensuring an ergonomic desk set-up).
- DTS for supporting the provision of additional technologies to support individuals with disabilities (where applicable and approved by the relevant budget holder).
- Estates for monitoring access requirements for staff (and other individuals) on campus, and for implementing updates to access requirements as required Estates also support the implementation of Personal Emergency Evacuation Plans (PEEPs), typically in consultation with the individual staff member and their line manager.
- Staff Counselling for helping and advising disabled staff who approach them, both for work-based issues and situations relating to personal circumstances.
- Other teams around the School may also have a role to play, depending on an individual's role and staff group, e.g. the Timetables Office provides timetabling support to academic staff.

5.7. In addition to the above, other members of staff – such as trade union safety representatives and staff network representatives - play a role towards a more supportive environment for disabled staff as well as contributing in specific cases.

5.8. The School also uses external services to provide additional support and advice which inform the management of disability (such as Occupational Health) as well as general wellbeing (such as the School's Employee Assistance Programme).

6. Policy principles

6.1. The School is committed to creating an inclusive, safe and supportive environment for all staff and to addressing the barriers to inclusion that adversely impact upon disabled people. In addition to supporting disabled staff in their current roles, this also means taking positive steps to ensure that disability is not a barrier to progression in employment.

6.2. All managers and staff have a role to play in ensuring that disabled individuals are treated with dignity and respect. In particular, managers and staff should be mindful that some employees may not wish to share information about a disability and some employees may have disabilities that are not immediately apparent. All staff should avoid using language that could be potentially stigmatising or demeaning to disabled staff. All staff who experience distress, on the basis of a disability or for any other reason, will be supported appropriately through the line-management structure, HR or by referral to appropriate supporting services (such as Staff Counselling).

6.3. The School considers its reasonable adjustment duty as fundamental to creating an inclusive, safe and supportive environment for all. Reasonable adjustments for disabled staff should be relevant to their individual needs, appropriate, inclusive and in accordance with the School's policies and procedures as well as equality legislation (including the Equality Act 2010).

- 6.4. The School endeavours to offer an environment where employees feel comfortable sharing information about a disability and asking for reasonable adjustments. Staff are not obliged to notify the School that they have a disability, although it may be in their interests to do this so that reasonable adjustments can be discussed and implemented. The School also recognises that not all disabilities are identified at the start of an individual's employment, and some staff may experience and/or share information about a disability at a later stage. It is also recognised that certain conditions are likely to fluctuate and may change over time. The School will follow a similar process for discussing, identifying and implementing reasonable adjustments to support staff whenever an employee shares information about a disability or the line manager reasonably believes that the employee may be facing disability-related barriers at work.
- 6.5. All disability information is kept confidentially in accordance with the School's data protection procedures and GDPR obligations. Information relating to individual cases is only shared on a strictly 'need to know' basis, for example where information needs to be shared to support the effective implementation of a reasonable adjustment. This may include third parties, such as Occupational Health and other medical professionals. Wider demographic information regarding disability in the staff community may be shared in accordance with GDPR principles as well as any data sharing agreements that may be in place, such as with the School's recognised trade unions.
- 6.6. The School will use a number of means to raise disability awareness within the School community, including through the School's Staff Networks, focused wellbeing initiatives for staff and collaborative staff-student projects. The School will also seek to raise disability awareness with external organisations with whom the School is in regular contact, such as via the Supplier Code of Practice.

7. Sharing information about a disability

- 7.1. The School endeavours to offer an environment which encourages employees with a disability or long-term condition to feel comfortable sharing this information as part of an open and supportive workplace culture. Sharing information about a disability enables the School to inform staff about the support options available and to put in place reasonable adjustments that minimise any disadvantage and contribute towards a positive employment experience.
- 7.2. Telling the School information about a disability is at the employee's discretion and no employee should feel obliged to share information about a condition if they do not wish to do so. Where staff choose not to share new information or do not give consent for information to be shared for the purposes of support, there will be restrictions or limitations on the level of support and the nature of reasonable adjustments that the School can offer. In particular, staff should note that, if they choose not to share information about a disability or any barriers they are facing at work, it may be difficult for the School to put effective and appropriate adjustments in place. This is also the case for implementing a Personal Emergency Evacuation Plan (PEEP) for employees who may need support in evacuating a campus building in an emergency.
- 7.3. An employee may decide to tell the School if they have a disability during recruitment or as part of their induction process. Current staff may choose to tell the School about a disability at any time via [MyView](#) (the School's online self-service portal for staff) and/or in conversation with their line manager or HR Partner.

- 7.4. Where an employee tells the School that they have a disability, the first step should be a supportive and collaborative conversation between the employee and their line manager to discuss adjustments (see **8. Reasonable adjustments**). Any personal information shared during the conversation (or subsequently) will be treated in confidence.
- 7.5. In rare instances, circumstances may require the School to lift confidentiality. Any lifting of confidentiality will be made on a strictly 'need to know' basis and the employee will be informed, except in cases where:
- There is a legal obligation to lift confidentiality without discussion with the staff member, *and/or*
 - The health and safety of the staff member or others may be adversely affected by not doing so.

8. Reasonable adjustments

- 8.1. The School will consider and implement reasonable adjustments to facilitate inclusion, remove barriers and contribute towards a positive staff experience. Reasonable adjustments are evidence-based and are normally the product of constructive discussions between the employee and their line manager, in conjunction with independent supporting information (such as a consultant letter, medical report, Access to Work assessments etc.). Additional factors may also be taken into account, such as the employee's working (or home) environment, the services provided by the School, and principles of employment law to prevent substantial disadvantage.
- 8.2. What is 'reasonable' will depend on the situation. In particular, it needs to be considered whether a potential adjustment:
- Will remove or reduce the disadvantage for the individual with the disability
 - Is practical to make
 - Is affordable (taking into account both funding available through the School and external sources, e.g. Access to Work)
 - Could harm the health and safety of others

While adjustments are often intended to support an individual in undertaking the core requirements of their role, they should not replace or discard those requirements. For example, while a disabled employee could be given more time to undertake a piece of work, it may not be considered reasonable to remove the need for that piece of work to be undertaken.

- 8.3. The line manager should be open, responsive and willing to trial different arrangements in order to address the staff member's needs efficiently. Adjustments may differ depending upon both the employee's individual circumstances as well as the nature of their role and staff group (for example, they may be different for academic and professional service staff). To assist the employee, line manager and HR Partner in exploring what adjustments are appropriate, the School has developed a Reasonable Adjustments Flowchart.
- 8.4. Where specialist advice is required, this should first be discussed with the employee before a referral is made to a specialist, with support from the HR Partner. Where there is a delay in specialist advice being provided (for example where a disability has only recently become apparent), the line manager should work with the employee to explore appropriate and reasonable options to support them until such advice has been received.

- 8.5. Where an employee has only recently acquired their disability or the employee and line manager are unsure what adjustments are needed, further discussions, as well as input from other areas – such as HR, Health and Safety, as well as external experts – may be necessary as the employee (and School) learns over time what adjustments they require.
- 8.6. Staff who have been living with disabilities for a long time are likely to have considerable knowledge about their condition as well as a clear idea of what their needs are. It may also be helpful for medical personnel or other specialists who are already treating or working with the disabled employee to input into the process.
- 8.7. Examples of reasonable adjustments include, but are not limited to:
- Making reasonable adjustments during the recruitment process (such as providing extra time during an interview or assessment)
 - Making reasonable adjustments to the physical environment, e.g. widening a doorway or building a ramp
 - Exploring flexible working hours, either on a long-term or more temporary basis
 - Acquiring or modifying equipment, e.g. providing an adapted keyboard
 - Providing assistive software, as required for the role (such as speech-to-text software)
 - Where possible, providing information in alternative accessible formats (such as large print, audio or Braille)
 - In the case of academic and teaching staff, scheduling classes and/or rooms appropriately so that the needs of both students and the academic staff member can be met as far as reasonably possible
 - Supporting employees who become disabled, or whose disability leads to an absence from work, with a phased return (e.g. working flexible hours).
 - Allowing staff time off to attend medical appointments.
- 8.8. Reasonable adjustments are not set in stone and should be reviewed periodically (and as required by circumstances) by the line manager, in conjunction with the employee and other advice as appropriate (e.g. from HR) to ensure that they are necessary and sufficient. Reviews should be undertaken in a timely manner and at intervals agreed with the employee. Reviews should aim to identify the most appropriate support for the employee – taking into account both the initial assessment as well as any changes that have occurred in the intervening period – and they should be constructive, with the aim of minimising uncertainty and/or distress.
- 8.9. The School acknowledges that the nature of academia means that additional and/or different support may be appropriate for disabled individuals in academic roles. Such staff manage their own workload so that they have time both for activities that are scheduled at specific times (such as teaching duties, office hours or meetings with colleagues, LSE citizenship duties etc.) and research time which is essential both to their own professional development and the School. In seeking to balance these commitments, it is highly important that disabled staff are not unfairly disadvantaged, e.g. through absence, illness or another impact of their disability. As such, reasonable adjustments for academic staff with disabilities and/or chronic health conditions need to enable them to participate as fully as is practicable in all aspects of their roles as well as the wider life of the School. This might include support in adjusting an individual's workload to enable them to focus on all aspects of their academic role.

- 8.10. Further guidance on reasonable adjustments can be found in the Guidance for Managers on Reasonable Adjustments.

9. Technological support for disabled staff

- 9.1. The School is committed to providing inclusive technology which enables all staff, including those with disabilities, to work, collaborate and interact effectively. As part of this commitment, the School invests in assistive technologies that make information (whether online or on paper) more accessible for individuals with disabilities.
- 9.2. Staff can request a consultation with DTS to discuss bespoke solutions for their individual needs. Solutions may include text-to-speech screen readers, voice recognition software, screen magnification software, and ergonomic keyboards and mice. Staff can contact tech.support@lse.ac.uk to book a consultation or if they have general accessibility queries.

10. Access to Work

- 10.1. Access to Work is a government fund run by the Department of Work and Pensions which provides support to disabled people to help them overcome work-related obstacles resulting from their disability. An Access to Work grant can pay for a person's practical support if they have a disability, health or mental health condition that makes it hard for them to do parts of their job or get to and from work. The money does not have to be paid back and will not affect any other benefits that the individual is receiving.
- 10.2. Where appropriate, the School may ask an employee to make an application to Access to Work to support funding where reasonable adjustments are extensive and/or ongoing.
- 10.3. More information about how the scheme works, including eligibility criteria, can be found on the [Access to Work webpages](#).

11. Disability and recruitment

- 11.1. The School aims to recruit, train, develop and retain talented staff, regardless of any protected characteristic, including disability. Applicants have an opportunity to share information about a disability on the 'equal opportunities' part of their application. This information is retained by HR and is not available to view by the recruitment panel.
- 11.2. The School is a member of the [Disability Confident](#) scheme, under which applicants who consider themselves to be disabled may request a guaranteed interview provided that they meet the essential criteria for the role in question. Progression through the membership scheme is a key part of the School's plans to enhance the support available to disabled individuals across the LSE community.
- 11.3. The School will endeavour to make all reasonable adjustments that are requested during a recruitment process to enable a disabled candidate to participate fully. If invited for interview, the applicant will be asked if they require any reasonable adjustments to attend.

- 11.4. Applicants are welcome to visit the campus to enable them to better identify their potential support needs; existing staff are also welcome to visit other departments if are considering applying (or have applied) for another role via an internal recruitment process.
- 11.5. Information on disability support will be made available to new starters at the School as part of their induction materials.

12. Disability and sickness absence

- 12.1. Staff can self-certify their absence as disability-related through [MyView](#). Absence which is related to a disability is (and must be) recorded and managed separately from other categories of sickness absence. Disability-related absence must be treated as unique to the individual and must be managed on a case by case basis, i.e. the way in which an individual's situation is managed does not in itself create a precedent for how the situations of others should be managed.
- 12.2. It is acknowledged that disability-related absence may be planned (for example, in the case of medical appointments) and unplanned (for example, where work pressures induce an aggravation of a disability). While any disability-related absence will still form (a separate) part of an employee's overall absence record, such absences are in themselves an opportunity for the line manager (with HR support as appropriate) to work with the employee to identify any further adjustments or support that could be put in place.
- 12.3. Staff with ongoing disabilities may require ongoing treatment and time off to attend medical appointments (which may include disability-related programmes, such as pain management). Employees should discuss their need to attend such medical appointments with their line manager as early as possible. Where possible, staff should try to make appointments at the beginning or end of their normal working day. Part-time staff and shift workers should try to schedule appointments for when they are not working. In line with the School's sickness absence procedures, such appointments are not recorded as sickness absence unless they require more than half a day away from work.
- 12.4. Medical appointments related to disability (or any other condition) will be accommodated wherever reasonably possible. Managers and employees are expected to be as flexible as possible in ensuring that relevant medical treatment is received, as well as agreeing how any work gaps may be addressed.
- 12.5. Where an employee's absence record (including any disability-related absences) is having a significant impact on their attendance and/or performance in their role *and* recommended reasonable adjustments have been explored, the Capability Health Policy and Procedure for Professional Services Staff (or equivalent procedure for other staff groups) may apply. Implementation of the latter procedure may happen alongside the addressing of any other concerns that have been raised (such as those relating to health and safety, or discrimination and bullying related to disability).

13. Ill health retirement

- 13.1. Where an employee's health has deteriorated to the extent that they can no longer perform their duties, and all reasonable efforts to redesign their role or secure redeployment have been unsuccessful, retirement on the grounds of ill health will be considered if the employee is a member of one of the School's pension schemes. An application for ill health retirement will be referred to the HR Pensions team. All applications will need to be supported by appropriate medical reports, which individuals will be required to obtain and authorise for release to the pension scheme Trustee. In these circumstances, the School will support the employee as far as possible with their application, although it is ultimately the decision of the pension scheme Trustee whether to approve individual applications. In the event that an application is rejected, the process will revert to the relevant capability health procedure.

14. Training and development

- 14.1. The School endeavours to provide the appropriate training and development to all staff to enable them to undertake their roles effectively and to progress both their personal and professional development. As part of this commitment, the School will aim to ensure that all managers are better trained in how to address and manage disability issues in their teams, through additions to the core training programme offered to staff as well as tailored sessions for line managers.
- 14.2. All staff attending a training programme or course are asked if they have any access requirements or other reasonable adjustments that need to be accommodated. Where in-person training is arranged, this is normally held in accessible venues with consideration of the needs of disabled staff, including larger print handouts for those with visual impairments, or printed on different coloured paper to assist those with scotopic sensitivity.
- 14.3. In addition to specific discussions about reasonable adjustments, conversations about wellbeing in general (and disability in particular where relevant) should be part of one-to-one meetings and catch-ups between employees and managers. For professional services staff, wellbeing discussions have been incorporated into the available guidance on the [Career Development Review \(CDR\)](#) process, including the setting of wellbeing-specific objectives. Similar expectations apply to manager-employee discussions among academic, research and teaching staff.

15. Safe access requirements on campus

- 15.1. The School aims to continually improve the accessibility of its campus and facilities for the benefit of all who work, study or visit. This includes:
- Providing suitable access to School buildings via lifts and ramps.
 - Reviewing and improving existing facilities, e.g. installing automatic doors that provide hands-free entry or maintaining accessible toilets.
 - Designing, publishing and reviewing fire evacuation procedures for each School building.
- 15.2. Where requested by an employee and/or advised by medical advice, a Personal Emergency Evacuation Plan (PEEP) may be completed by a Fire Safety Advisor, with the employee's cooperation. PEEPs set out the specific arrangements to support anyone who, due to the nature

of a physical or other condition, cannot safely evacuate from a building, acknowledge or respond to a fire signal without being assisted. In addition to visible physical disabilities, this may also include cognitive or psychological conditions (such as epilepsy or autism) that may impact upon a person's ability to evacuate the building in an emergency. More details about PEEPs, as well as other provisions supporting safe evacuation procedures, can be found in the [Policy for Safe Evacuation of Persons with Disabilities](#).

- 15.3. A number of accessible parking bays are available near LSE's main (Houghton Street) campus. This parking is provided under the '[Blue Badge' scheme](#) which provides special parking rights for vehicles carrying drivers or passengers with disabilities. There are also additional 'Blue Badge' parking bays on Portugal Street and Sardinia Street.

Further information on accessible parking and other transport options can be found on [the LSE website](#). External advice on transport support services for disabled people is available on the [UK government's webpages](#).

16. Raising a concern

- 16.1. Where staff feel that they have not been treated in line with the principles within this policy, they have a number of options available to them for raising their concerns, whether these relate to local or central support.
- 16.2. Staff are encouraged to raise concerns with their line manager or HR Partner in the first instance. If this does not result in a satisfactory response, or they do not feel comfortable in doing so, they should approach the School's Disability and Mental Health Adviser.
- 16.3. The School is also able to support staff in resolving concerns through mediation; staff can find out more about this from their HR Partner.

17. Discrimination, harassment, bullying and victimisation

- 17.1. The School is committed to a working and learning environment where people can achieve their full potential free from any form of discrimination, harassment or bullying. Discrimination and harassment are not limited to people with a disability but may also apply to those associated with a disability, e.g. associative discrimination in the case of a carer for a disabled child.
- 17.2. Harassment may take the form of verbal abuse or other actions that make an individual feel uncomfortable, intimidated or degraded. Discrimination is defined as when someone is treated less favourably or put at a disadvantage because of one or more of their protected characteristics. Discrimination may be direct or indirect. In addition, another category of discrimination is discrimination arising out of a disability, which occurs when a disabled individual is treated unfavourably because of something connected with their disability and there is no justification for this treatment; there is no need for comparison with another individual for this type of discrimination.
- 17.3. Misconduct which is unintentionally detrimental towards disabled individuals may, where appropriate, be addressed and resolved informally. Where behaviour is more serious, intentional

and/or deliberate, formal procedures are applicable (e.g. disciplinary procedure where an allegation is made against another employee).

- 17.4. Appendix 2 of the School's [Discrimination, Harassment and Bullying Policy](#) provides a list of internal and external contacts that staff can contact if they feel that they have been subject to discriminatory treatment on the basis of disability. This includes the [Safe Contacts network](#), the [Report It Stop It](#) online form, and/or their [HR Partner](#).

18. Monitoring and reporting

- 18.1. The School is legally required under the Equality Act 2010 to monitor and report annually its disability disclosure figures for staff and students. These figures are collected via individual staff records (both during recruitment and for current staff), student admission data and student records. Statistics on staff are also reported in the annual University Equality Monitoring Report as well as HESA student returns.
- 18.2. The School will continue to collect and monitor these statistics, as well as taking steps to encourage employees to feel comfortable sharing their data as part of its commitment to an inclusive working environment. Early sharing of information about a disability is encouraged so that reasonable adjustments can be put in place as early as possible.
- 18.3. All reporting on disability data will be anonymous in nature and no individuals will be identified. Information on staff who share information about a disability will be kept confidentially on the appropriate data system, in line with the School's [Data Protection Policy](#) and UK GDPR obligations.

19. Further resources

- 19.1. The School's [Disability and Wellbeing Staff Network \(DAWN\)](#) aims to make the School more disability confident and raise awareness about disability on campus. Staff are encouraged to contact edi@lse.ac.uk if they have any questions or wish to be part of the network.
- 19.2. The School's Disability and Wellbeing Steering Group is chaired by the Pro-Director (Education) and meets periodically to discuss disability-related matters that affect staff and students.
- 19.3. More information on assistive technologies can be found on the [Assistive Tech webpage](#).
- 19.4. Further information on workstation risk assessments that inform more general support options for staff is available on the [Health and Safety webpages](#).
- 19.5. The trade unions recognised by the School can provide advice in individual cases and general support, as well as being a means for wider concerns about the employment experience of disabled staff to be raised. In addition, in line with UK law², union-appointed safety representatives make an important and practical contribution to the health and safety of staff.

² Safety Representatives and Safety Committees Regulations 1977

19.6. General wellbeing support for staff can be accessed through:

- [Staff wellbeing webpages](#)
- [Employee Assistance Programme \(EAP\)](#) which provides confidential telephone counselling and more as a 24/7 service
- [Staff Counselling Services](#)

19.7. The School is a member of the [Business Disability Forum](#), a not-for-profit membership organisation which provides (among other resources) networking opportunities, access to disability guidance and an [Advice Service](#).

20. Review

20.1. This policy and its accompanying EIA will be reviewed in one year's time and then in line with HR's policy review schedule, as well as benchmarking exercises and any legislative changes.

Review schedule

Review interval	Next review due by	Next review start
Annual	November 2022	August 2022

Version history

Version	Date	Approved by	Notes
2	September 2021 November 2021	HRMB JNICC	

Contacts

Position	Name	Email	Notes
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Communications and Training

Will this document be publicised through Internal Communications?	Yes
Will training needs arise from this policy	Yes
If Yes, please give details Training will be carried out as part of the 'LSE Manager: Bringing Policy to Life' sessions.	