WILTSHIRE POLICE

XXXXXXXX
By email

Force Disclosure Unit
Police Headquarters
London Road
DEVIZES
Wiltshire
SN10 2DN

Date 9th November 2026 **Our Ref** FOI 2026-964

Dear XXXXX,

I write in connection with your request for information dated 12th October 2026, concerning prayer facilities.

I am required by the Freedom of Information Act 2000 to handle all requests in a manner that is blind as to the identity and motives of the requestor. Any information released as a response to a request is regarded as being published and therefore in the public domain without caveat.

Following receipt of your request, research was conducted by the Force Policy Officer, Occupational Health Unit and Culture & Inclusion department at Wiltshire Police.

Your request for information has now been considered and I am able to respond as follows.

You wrote and our response:

Under the Freedom of Information Act 2000, please provide the following recorded information about facilities on premises owned, leased or occupied by your force that are designated, provided or routinely made available for prayer, religious observance, contemplation or quiet reflection.

This includes facilities described as prayer rooms, multi-faith rooms, faith rooms, contemplation rooms or quiet rooms, and rooms shared with other functions where prayer or religious observance is an expressly permitted use.

Please limit this request to facilities currently in operation and the policies, rules and instructions currently applicable to them.

1. Facilities and their designated purposes

Please provide any existing list or register identifying these facilities, their recorded names or descriptions, and their designated purposes. If no such list or register is held, please provide the relevant extracts from records identifying these facilities.

A room identifier may be substituted for a precise location if disclosure of the location would raise security concerns.

The Quiet Rooms are wellbeing facilities intended to provide officers and staff with a safe, peaceful space for reflection, mindfulness, relaxation, and decompression. They are not designated as prayer rooms or multi-faith facilities.

Current Quiet Room locations are:

- **HQ Main Building (Room 124, Second Floor)**
- **HQ Crime and Communications Centre (F08, First Floor)**
- **HQ Occupational Health Unit Out of Hours (Waiting Room, 18:00-08:00)**
- **Royal Wootton Bassett (Room 13, Ground Floor)**
- **Salisbury (First Aid Room, Second Floor)**
- **Swindon (Room 141, First Floor)**
- **Melksham (F44B, First Floor)**
- **Tidworth (F03, First Floor)**
- **Trowbridge (F06, First Floor)**
- **Warminster (Room 06, Ground Floor)**

2. Policies, rules and instructions

Please provide copies of the current policies, procedures, user guidance, booking conditions and standing instructions governing access to and use of these facilities.

Please include both force-wide documents and any rules specific to individual facilities. This includes applicable instructions held in intranet pages, staff notices, emails communicating standing rules, and displayed notices, whether or not described as a formal "policy".

In particular, please provide recorded information specifying:

- Who is permitted to use the facilities, including any conditions relating to religion, belief or absence of religious belief.
- Whether use is restricted or reserved for particular religions, groups or activities, either permanently or at particular times.
- Booking arrangements, priority rules and arrangements for simultaneous use by people undertaking different activities or observing different religions.
- Any requirements or requests concerning footwear, including removal of shoes, and whether these apply to the whole room or particular areas.
- Any rules concerning clothing, head coverings, washing, food, drink, speech, music, or separation by sex.
- The display, provision, storage or removal of religious objects, texts, prayer mats and other equipment.

These points identify the information sought; they do not require the force to create explanations where no recorded information is held.

Please see relevant policy at the end of this letter.

3. Signage and notices

Please provide the wording of current signs and notices displayed at the entrance to, or inside, these facilities which concern their designation, access or use.

Please provide existing electronic copies, artwork, scans or photographs of those signs and notices where held. If these are not held in those formats, please provide the recorded wording in another available form.

Please see available signage / notices at the end of this letter. Note - QR codes have been redacted from the signs as these are for internal use only.

4. Existing photographs

Please provide the most recent existing photographs held showing the interior and entrance signage of each facility.

I am requesting existing photographs only, not asking the force to take new photographs. People, security-sensitive details and unrelated material may be redacted where necessary.

Please see existing photographs at the end of this letter.

5. Approval and responsibility

Please provide current recorded information identifying:

- The role or department responsible for managing each facility.
- The role or department responsible for approving its rules.
- Any current terms of reference, agreement or approval record establishing its designated purpose and conditions of use.

Where the same document applies to multiple facilities, please supply it once and identify which facilities it covers.

Occupational Health and Wellbeing

There are no other any additional policies, procedures or approval records held within Occupational Health and Wellbeing relating to the management or use of the Quiet Rooms.

I am satisfied that all the relevant information has been passed to me and been considered in the light of your request within the time constraints applicable under the legislation.

Wiltshire Police would like to thank you for the interest that you have shown in the Force.

Yours sincerely,

FDU Decision Maker

External poster



Internal poster

Quiet Rooms

This Quiet Room space is open to everybody in Wiltshire Police in need of a quiet area to relax and decompress. With the exception of rooms that double as a one-to-one meeting room, Quiet Rooms are not bookable and can be used at any time.

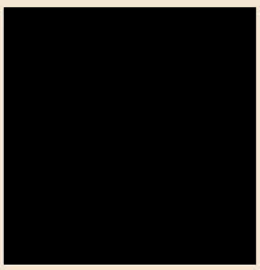
While you are here:

- Respect the space and the equipment
- No phone calls
- No food or drink
- Keep noise to a minimum
- Rest your eyes - but no sleeping!

When you leave

- Do not remove anything from the room
- Tidy up before you leave

Many thanks and enjoy the space.



Please scan the QR code to leave your feedback for the space.

Room suggestions

Suggested Uses for the Room

While this room was created to be used as a space to decompress, relax and reflect, you could also consider using it for:

- Prayer and meditation
- Safe space for neurodivergent colleagues
- Peer Supporter meetings
- TRiM assessments
- Reading or studying



Please scan the QR code to leave your feedback for the space.

Quiet/Reflection Room Equipment List

- Small comfy sofa (with 2 cushions)
- Comfy chairs x2 (1 for smaller rooms)
- Small coffee table
- Bookcase
- Mini fridge
- Occupied/In Use sign for outside door
- Prayer mat
- Wall art (landscapes)
- Plastic plants x4 (2 large, 2 small)
- Lamp x1
- Mood Bubble Lamp
- Bluetooth speaker
- VR Headset
- Assortment of fidget toys
- Rules of the Room poster (no eating etc.)

HQ Main Building





Crime and Communications Centre



Royal Wootton Bassett



WILTSHIRE POLICE
FORCE POLICY

Equal Opportunities Policies & Procedures

Date of Publication: June 2025
Version: 2.2
Next Review Date: December 2025

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POLICY STATEMENT

Wiltshire Police is committed to the principles of equality, diversity and inclusion and will strive to become an employer of choice. We will achieve this through developing a diverse workforce and engaging with the public. We will do this because we believe the principles of equality and diversity are about social justice, fairness, human rights and equal access to opportunities. We will act in accordance with the Code of Ethics and respect the rights of our staff and communities to ensure they are treated with dignity, fairness and respect.

We will strive to develop our workforce to be truly representative of all sections of our community that we serve. We will provide a workplace where each individual feels respected and able to give their best. We will build trust and confidence in the integrity and professionalism of our officers and staff and the service we deliver. Wiltshire Police has a zero tolerance approach to bullying, harassment and victimisation on the grounds of protected characteristics.

Selection for employment, promotion, training or any other benefit will be on the basis of aptitude and ability underpinned by the values and principles of the Code of Ethics. Diverse teams bring variety of thought, innovation and creativity and will help us to better understand the needs of our communities. All employees will be encouraged to develop to their full potential so that the combined talents and resources of the workforce are used to the best effect.

This policy has two main aims. Firstly, to ensure that we meet our legal obligation and that no individual receives less favourable treatment because of a protected characteristic as defined under the Equality Act 2010. Secondly, this policy aims to help Wiltshire Police create an environment in which individual differences and contributions of all our staff are recognised and valued.

This policy is an amalgamation of previously separate policies and procedures. The Wiltshire Police Equal Opportunities Policies cover:

Dignity at Work Policy
Positive Action Policy
Disability Policy
Religion, Belief and Cultural Awareness Policy
Transgender Policy
Making Reasonable Adjustments – Guidance for Managers

Staff should not discriminate against, or harass a member of the public in the provision of our services or that of one of our partner agencies. It is unlawful to fail to make reasonable adjustments including the removal, adaptation or alteration of physical features, if the physical features make it impossible or unreasonably difficult for disabled people to make use of services. In addition, we have an obligation to think ahead and make reasonable adjustments to address any barriers that may impede disabled people from accessing a service.

This area of disability is underpinned by Wiltshire Police being leaders in the government scheme that is supported by the DWP regarding the ‘Disability Confident Scheme’.

Additionally, no employee or potential employee will be treated less favourably on the grounds of trade union or staff association membership or non-membership.

POLICY AIM

To ensure that we meet our legal obligation; that no individual receives less favourable treatment because of a protected characteristic as defined under the Equality Act 2010 and to help Wiltshire Police create an environment in which individual differences and contributions of all our staff are recognised and valued.

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APPLICABILITY

All police officers and staff, including the extended police family and those working voluntarily or under contract to Wiltshire Police must be aware of, and are required to comply with, all relevant policy and associated procedures.

LEGAL BASIS AND DRIVING FORCE

The Equality Act 2010 provides the legal framework and is the legislation that eliminates these types of unlawful actions:

- Direct discrimination
- Indirect discrimination
- Discrimination by perception
- Discrimination by association
- Victimisation
- Harassment

Protected characteristics under the Equality Act 2010 are as follows:

- Age
- Disability
- Gender reassignment
- Marriage or civil partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex (gender)
- Sexual orientation

It is unlawful to discriminate directly or indirectly in recruitment or employment because of these highlighted characteristics.

RELATED POLICIES, PROCEDURES and OTHER DOCUMENTS

Equality, Diversity and Inclusion Strategy 2019-2021
Positive Action Delivery Plan 2020-21
College of Policing Positive Action Guidance
People, Culture and Inclusion Strategy
Police and Crime Plan 2017-2021
Issue Resolution and Dignity at Work Policy

DATA PROTECTION

Any information relating to an identified or identifiable living individual recorded as a consequence of this policy will be processed in accordance with the Data Protection Act 2018, General Data Protection Regulations and the Force Data Protection Policy.

FREEDOM OF INFORMATION ACT 2000

This document has been assessed as suitability for public release.

EQUALITY IMPACT ASSESSMENT

A Equality Impact Assessment has been undertaken in terms of the nine protected characteristics of the Equality Act of 2010 (Age, Disability, Gender Reassignment, Sexual Orientation, Race, Pregnancy/Maternity Religion/Belief, Sex, Marriage and Civil Partnership). Wiltshire Police has adopted Equality Impact Assessment and Guidance provided by the College of Policing to ensure that best practice is followed in assessments undertaken.

MONITORING AND REVIEW

This policy will be reviewed yearly to reflect best practice and any changes to legislation and case law or national guidance or at such other times as may become necessary.

WHO TO CONTACT ABOUT THIS POLICY

The Director of People and Change is responsible for this policy. All queries relating to this policy should be directed to the Equality, Diversity & Inclusion Team or the Force Policy Officer.

DIGNITY AT WORK POLICY

Where a complaint or report of bullying or harassment in the workplace is made, it will be considered seriously and as a priority. Such behaviour may amount to a criminal offence and/or may result in internal misconduct action or legal proceedings through a Tribunal or Civil Court.

For further information on issue resolution procedures please see the Grievance Procedure which details the sources of advice and support for individuals.

Wiltshire Police has a duty of care to its employees. If an allegation of bullying or harassment falls outside of the scope of issue resolution this can be reported to professional standards or anonymously to the anti corruption unit.

An assessment will be undertaken and misconduct proceedings may be deemed necessary as per the disciplinary procedure/conduct regulations.

Types of unlawful discrimination

The examples provided are intended to be illustrative and are not to be considered exhaustive.

Bullying is offensive, intimidating, malicious or insulting behavior, and/or abuse or misuse of power that is meant to undermine, humiliate or injure the person on the receiving end.

Harassment is where there is unwanted conduct, related to one of the protected characteristics (other than marriage and civil partnership, and pregnancy and maternity which are covered by direct discrimination) that has the purpose or effect of violating a person's dignity; or is reasonably considered by that person to create an intimidating, hostile, degrading, humiliating or offensive environment. It does not matter whether or not this effect was intended by the person responsible for the conduct.

Examples of unacceptable behavior include (but are not limited to):

- physical conduct ranging from unwelcome touching to serious assault
- demeaning comments about a person's appearance
- unwelcome jokes or comments of a sexual or racial nature or about an individual's protected characteristic, e.g. age, disability, sexual orientation (including perceived sexual orientation), gender identity and/or expression, or religion
- Threats or the offer of rewards for going along with sexual advances
- the use of obscene gestures
- questions about a person's sex life
- ignoring an individual because they are perceived to have a protected characteristic when they do not, in fact, have the protected characteristic, egg an employee is thought to be of a certain religion or belief, or is perceived to be transgender
- unwanted nicknames, whether related or unrelated to a person's protected characteristic
- ridiculing someone
- excluding someone from social activities

Direct discrimination is where a person is treated less favorably than another because of a protected characteristic.

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In limited circumstances, employers can directly discriminate against an individual for a reason related to any of the protected characteristics where there is an occupational requirement. The occupational requirement must be crucial to the post and a proportionate means of achieving a legitimate aim.

Indirect discrimination is where a provision, criterion or practice is applied that is discriminatory in relation to individuals who have a relevant protected characteristic (although it does not explicitly include pregnancy and maternity, which is covered by indirect sex discrimination) such that it would be to the detriment of people who share that protected characteristic compared with people who do not, and it cannot be shown to be a proportionate means of achieving a legitimate aim.

Associative discrimination is where an individual is directly discriminated against or harassed for association with another individual who has a protected characteristic (although it does not cover harassment because of marriage and civil partnership, and (according to guidance from the Government and Acas) pregnancy and maternity).

Perceptive discrimination is where an individual is directly discriminated against or harassed based on a perception that they have a particular protected characteristic when they do not, in fact, have that protected characteristic (other than marriage and civil partnership, and pregnancy and maternity).

Victimisation occurs where an employee is subjected to a detriment, such as being denied a training opportunity or a promotion because they made or supported a complaint or raised a grievance under the Equality Act 2010, or because they are suspected of doing so. However, an employee is not protected from victimisation if they acted maliciously or made or supported an untrue complaint in bad faith.

For example, if an employee with a disability raises a grievance that the employer is not complying with its duty to make reasonable adjustments, and is then systematically excluded from all meetings, such behaviour could amount to victimisation.

Failure to make reasonable adjustments is where a physical feature or a provision, criterion or practice puts a disabled person at a substantial disadvantage compared with someone who does not have that disability and the employer has failed to make reasonable adjustments to enable the disabled person to overcome the disadvantage.

Legal Framework and National Guidance:

Health and Safety at Work Act 1974
Protection from Harassment Act 1997
Equality Act 2010
Data Protection Act 2018
Management of Health and Safety at Work Regulations 1999 (SI 1999/3242)
General Data Protection Regulation (2016/679 EU)

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POSITIVE ACTION POLICY

Wiltshire Police are committed to supporting and encouraging positive action so that the Force can progress towards our goal of developing a diverse workforce that reflects our communities.

In employment, Positive Action covers a series of measures that can be taken to help redress any imbalances that may have arisen in the workplace as a result of past or current discrimination or disadvantage. This legal framework is applied to address under–representation in respect of the nine protected characteristics listed under the Equality Act 2010.

Positive Action provides a range of **lawful actions** that overcome or minimise disadvantages in relation to employment opportunities that people who share a protected characteristic may experience, or to meet their different needs. Section 158 of the Equality Act 2010 allows employers to use the positive action general provisions.

Positive Action gives individuals from under-represented groups a chance to access support and training, in preparation for and throughout recruitment process, to overcome disadvantages competing with others. It is **not** about lowering standards, but rather encouraging and getting candidates to an equal playing field; selection is based on merit only.

The positive action provisions in the Equality Act 2010 are voluntary. Other than in respect of disability under s13(3) of the Equality Act 2010, positive discrimination remains unlawful.

The role of Monitoring

Identification of under representation is the first step before any positive action initiatives should be undertaken; College of Policing Guidance must be followed to ensure that best practice is complied with in an evidence based approach. The Force is therefore committed to monitoring across all strands of diversity, throughout all recruitment, selection and promotion processes.

Where under representation is identified, further work will be carried out to try to establish what the barriers may be. Where appropriate, positive action initiatives will then be undertaken with a view to redressing any imbalance. The rationale for the action taken will be evidenced with supporting data and monitored to ensure legal compliance.

Legal Framework and National Guidance

Employment Rights Act 1996
Equality Act 2010
Data Protection Act 2018
General Data Protection Regulation (2016/679 EU)

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DISABILITY POLICY

Wiltshire Police remains committed to being a Disability Confident Leader. As a Disability Confident Leader we have completed a self-assessment to an external challenge and validation. We are taking an active leadership role in encouraging and helping other employers on the journey to becoming Disability Confident.

Responsibilities of managers and employees

If a job applicant or an employee believes they have a disability that may disadvantage them in respect of recruitment or employment, they should share this with the organisation. Managers also have a responsibility to an employee who has a disability to make reasonable adjustments to the employees working environment if it is required.

Recruitment

Reasonable adjustments to the recruitment process will be made by talent acquisition/positive action team as required to ensure that no applicant is disadvantaged in the recruitment process because of their disability.

Induction

'Access to Work' to be involved with employees as soon as start dates are established. Once a formal job offer has been given along with a start date the employees' line manager will consult with the employee to ensure they have contacted access to work and reasonable adjustments are made to enable the employee to work safely and effectively and to secure equal access to the benefits of employment. Contact with 'Access to Work' through the DWP/Job Centre Plus is vital during the first 6 weeks of employment due to cost sharing:

- During the first 6 weeks – all costs sharing is covered 100% by Access to work
- After 6 weeks cost sharing is put in place by DWP/Job Centre Plus with a minimum of £1000 payable by Wiltshire Police

Where the line manager does not have the relevant knowledge or experience to make the reasonable adjustments they will consult with HR and/or the Occupational Health Department. Where necessary, an outside specialist may be consulted.

Wiltshire Police are now able to offer an in-house Dyslexia Assessment Team that can provide advice and assessments as requested by either staff members or line managers. An assessment can be arranged by completing the Dyslexia Assessment Referral Form. Line managers can request that assessments take place or individuals can self refer by contacting People Services or the EDI Team for further advice.

Training and Career Development

All employees will have equal access to training and opportunities for promotion and other aspects of career development. Each element of the promotion procedure and all training opportunities will be made accessible to disabled employees and the positive action team are available to provide support.

Where, during the course of employment, a disabled employee recognises the need for further reasonable adjustments to their working arrangements, or to a feature of the premises, they should discuss this requirement with their line manager. The line manager can seek clarity from HR and/or Occupational Health prior to determining the appropriate adjustments.

Employee Benefits

Disabled employees will have equal access to all benefits and facilities that are made available to Wiltshire Police employees (subject to reasonable adjustment to the estate/facilities).

Retention

As part of its commitment to equal opportunities for disabled people the organisation will ensure that all reasonable measures are taken to retain disabled employees in employment. It will be the responsibility of line managers to ensure that they are properly informed and to consider reasonable adjustments with regard to an employee who has a disability.

If redeployment is suggested by the FMO (Force Medical Officer) as the reasonable adjustment, the employee will be viewed as a priority within the redeployment procedure (subject to the rights of an employee on maternity leave who is at risk of redundancy).

Promotion

Wiltshire Police values all Officers and staff during the promotion process and will ensure they are supported appropriately with any reasonable adjustments that may be required.

Medical or occupational health reports

To aid discussions about the employee's condition (with the employee) at a case conference, the organisation may request a medical, vocational or functional assessment of the employee in relation to their disability. As part of the assessment, it may be helpful to obtain a report from the employee's GP or consultant. If a report from the employee's GP or consultant is required, the organisation will explain the employee's rights under the Access to Medical Reports Act 1988.

Wiltshire Police may consider it necessary to obtain a report and/or assessment where, for example, the employee, is unable to fulfil all of the duties and responsibilities of their role, has persistent intermittent short-term sickness absence, has been absent from work on long-term sickness absence or is likely to be or may be at a substantial disadvantage in seeking promotion compared to someone who does not have that disability.

The aims and objectives of obtaining a report and/or assessment is to ascertain if the employee is disabled; understand better the nature of the employee's disability and the impact on the employee's ability to perform their role; or consider what, if any, reasonable or long-term health adjustments should be made. The report or assessment findings will be discussed with the employee.

Reasonable adjustments

The organisation will make adjustments as are reasonable, to enable a disabled employee to carry out their duties and to remain in employment. These may include but are not limited to, the provision of specialist equipment and training, alterations to physical features of the workplace, job redesign, retraining, flexible hours, remote working and/or redeployment to a suitable alternative vacancy.

Please refer to ‘Making Reasonable Adjustments – Guidance for Managers’ section for further guidance.

Removing Barriers

Wiltshire Police recognises the importance of taking measures to remove barriers, physical or otherwise, from the working environment for disabled people. It is recognised that this will benefit not only disabled employees and prospective employees but also our customers and visitors.

Legal Framework and National Guidance

Access to Medical Reports Act 1988
Equality Act 2010
Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)
General Data Protection Regulation (2016/679 EU)
Employment statutory code of practice

RELIGION BELIEF AND CULTURAL AWARENESS POLICY

Wiltshire Police are an equal opportunities employer and we embrace diversity and inclusion.

The Equality Act 2010 protects all workers against direct and indirect discrimination on the grounds of "any religion, religious belief or philosophical belief". This can include a lack of religion or lack of belief.

The diversity provisions within this policy is not intended to be exhaustive and Wiltshire Police welcomes the identification of all diversity needs.

Religious Observance

It is Wiltshire Police's policy to endeavour, on request, to alter an employee's working pattern so that breaks can be granted at times that coincide with their needs for religious observance (as per the Flexible Working Policy and Procedures). Where at all possible the force will endeavour to provide suitable space within its estate for religious observance whilst at work.

Alternatively, the organisation will, where appropriate, endeavour to grant employees reasonable time off during working hours for religious observance insofar as this is possible and practicable, taking into account the needs of the business and whether or not such arrangements might cause disturbance or disruption to other members of staff and/or their work or work patterns (and as per the principles in the Leave Procedure).

However, where an employee requests time off at a particularly busy time or at a time when the employee's absence would otherwise cause difficulties for the business or their department, or where the amount of time off requested is unreasonable or excessive (taking into account the needs of the business), the organisation reserves the right to refuse to grant some or all of any of the time off requested.

All employees, whatever their religion or belief, will be treated equally in respect of requests for time off for religious observance or requests for alterations to their working patterns for religious reasons.

Standards of Dress

The intention is that diversity requirements will be positively supported where possible and operationally safe, following the undertaking of a risk assessment in relation to the specific role to be performed. Please refer to the Standards of Dress Procedure for further detail.

Dietary Requirements

Wiltshire Police will take all reasonable measures to ensure its catering services accommodate religious or cultural dietary needs where sufficient notice has been provided.

Employees must ensure that all food placed in the fridges on Wiltshire Police property are stored in sealed containers at all times. This is for the benefit of all employees, some of whom may wish to ensure that their food does not come into contact with, for example, meat products.

Wiltshire Police Chaplaincy Service

Chaplains are an invaluable source of support for Police Officers and staff within Wiltshire Police, by providing advice, education and training on multi-faith issues. Whilst they cannot formally represent all faiths, they represent an impartial source of support and guidance on issues regarding Religion or belief and Cultural needs.

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Legal Framework and National Guidance

Employment Rights Act 1996
Human Rights Act 1998
Equality Act 2010
Working Time Regulations 1998 (SI 1998/1833)
Flexible Working Regulations 2014 (SI 2014/1398)
Employment statutory code of practice

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TRANSGENDER AND THE WORKPLACE POLICY

This policy is under review.

Useful Contacts and further advice

For further advice on Transgender issues, please contact People Services and ask for your local HR Advisor. You can also speak to the Occupational Health Unit.

Organisation	Contact details	Services
Wiltshire Police LGBT+ Network	Scott Mcpherson	▪ Support network ▪ Sharing good practice
Mermaids	https://mermaidsuk.org.uk/ Tel 03443340550 0808 8010400 Email info@mermaidsuk.org.uk	▪ Support for transgender youth (up to and including 19 years), or parents of young persons.
UNISON	www.unison.org.uk Tel 0800 0857 857 Tel 01380 861126	▪ UNISON represents and acts for members
Wiltshire Police Federation	www.polfed.org Tel: 01380 861043	▪ The staff association for police constables, sergeants and inspectors (including chief inspectors)
Wiltshire Ethnic Police Association (WEPA)	WEPA@wiltshire.pnn.police.uk	▪ To promote good race relations and equality of opportunity
Wiltshire Disability Police Association (WDPA)	DSAWiltshire@wiltshire.police.uk;	▪ Support Network ▪ Sharing good practice

Legal Framework and National Guidance

Human Rights Act 1998
Gender Recognition Act 2004
Equality Act 2010
Data Protection Act 2018
General Data Protection Regulation (2016/679 EU)
Government guidance on the recruitment and retention of transgender staff

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MAKING REASONABLE ADJUSTMENTS – GUIDANCE FOR MANAGERS

1. INTRODUCTION: THE LEGAL DUTY TO MAKE REASONABLE ADJUSTMENTS

The Equality Act 2010

Who is 'disabled'?

- Under section 'e' of the Equality Act, a person has a disability if:
- They have a physical or mental impairment, and
- The impairment has a substantial and long-term adverse effect on their ability to carry out normal day-to-day activities."

This is quite a broad definition, which is not limited to visible disabilities. For example, the definition cover people with dyslexia, cancer, HIV, back problems and depression.

The Act also makes it unlawful for an employer not to make a 'reasonable' adjustment for someone with a disability, both in the recruitment and selection processes and in the workplace. This also includes probation, PDR, promotion processes and career development opportunities. This legislation covers Police Staff, Officers, Special Constables, trainees and any other people working or applying to work for Wiltshire Police.

What are reasonable adjustments?

Reasonable adjustments are simply modifications that take into account the effects of an individual's disability. For example, modifications could be made to –

- A selection process (i.e. providing forms in Braille)
- The premises or workplace (i.e. installing a hands-free telephone)
- Ways of working (i.e. colour coding a filing system)
- Hours or place of work (i.e. working around medication requirements)
- Leave provisions (i.e. time off for physiotherapy)
- Support at work (i.e. a mentor)
- Training provisions (i.e. training to use voice activated software)
- Communication methods (i.e. large print manuals)

Reasonable adjustments in selection processes are intended to ensure that disabled applicants are able to compete fairly with non-disabled applicants. They are not intended to give an unfair advantage to disabled candidates.

Reasonable adjustments in the workplace are intended to ensure that staff with disabilities have everything they reasonably need to perform their role effectively.

Many non-disabled people expect a suitable chair, table, lighting, stationery and equipment to be provided so that they can perform their role; people with a disability have the right to expect that their needs will also be met. Making reasonable adjustments in the workplace is a simple management function. It makes good business sense to ensure that all our staff have everything they may reasonably need to do their jobs well. This document is intended to provide guidance to managers, who are responsible for making reasonable adjustments.

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Why are reasonable adjustments needed?

The 'social model' of disability offers a different perspective to the Equality Act definition of disability:

"*The loss or limitation of opportunity to take part in society on an equal level with others due to social and environmental barriers"*

The social model reminds us that treating everyone fairly does not always mean treating people the same; making reasonable adjustments recognises that each individual has individual needs and ensures that disabled staff can access the same opportunities as non-disabled staff.

Who has responsibility for making reasonable adjustments?

The line manager is responsible for making decisions and implementing reasonable adjustments. However, their decisions must be informed by expert advice, for example from the line manager, the relevant HR Professional, as well as the appropriate specialists or approved specialist body and the disabled person. The Occupational Health Team should also be consulted. They can obtain expert advice from the appropriate specialist.

Jobcentre Plus also provides Disability Employment Advisors who can offer advice on adjustments in the workplace called Access to Work.

All reasonable adjustments should be recorded using the Reasonable Adjustment Passport.

Who determines what is 'reasonable'?

It is lawful to decline a request for an 'unreasonable adjustment'. However, only an Employment Tribunal can decide what is reasonable in particular circumstances for each organisation under the Equality Act, but factors such as the size and resources of an organisation as well as health and safety considerations are likely to be taken into account. Consideration should also be given to the likely effectiveness of the adjustment and the practicalities of implementation.

Employers will have to provide a strong justification to defend a failure to make an adjustment and prove that it really was 'unreasonable'. Employment Tribunals can order organisations and individuals to make payment of unlimited compensation to successful claimants under the Equality Act 2010.

It is important that managers consider all the options available and consult the relevant specialists and the employee before deciding that adjustments can or cannot be made. Decisions must be informed and not based on assumptions.

Who pays?

Where the implementation of a reasonable adjustment incurs cost, the Equality Act 2010 expects that employers will cover this.

Funding assistance is also available from your local Jobcentre Plus through the 'Access to Work' scheme. This allows the organisation to identify what an individual requires, with the assistance of a Disability Employment Advisor, and then seek approval for funding assistance. If Jobcentre Plus agrees to provide funding assistance, you can procure the required products and then claim back the agreed level of funding.

Sharing a Disability or a long-term health condition

There is no legal requirement for anyone to share they have a disability. It will not place them at a disadvantage and should they decide to share a disability, this will open up the opportunity for them to have reasonable adjustments made where further support will be addressed. However as a result of a disability, if there is a risk to the individual or others at work, then under the Health and Safety law the individual will need to share their disability with the organisation.

It is not enough for the employer to show that they did not know that the disabled person had the disability. They must also show that they could not reasonably have been expected to know about it. Employers should consider whether an employee has a disability even where one has not been formally disclosed, as, for example, not all workers who meet the definition of disability may think of themselves as a 'disabled person'.

2. THE DUTY IN PRACTICE

2.1 RECRUITMENT AND SELECTION

All applicants for police officer, special constabulary and police staff roles are asked whether they require any reasonable adjustments on the application form and in invitation to interview letters. The Recruitment Team will inform interview panels of any adjustments requested; it is the responsibility of the interview panel to ensure that reasonable adjustments are implemented.

The duty to make reasonable adjustments in selection processes doesn't just apply to entry-level recruitment but also to selection processes for career development, specialist posts and promotion opportunities. In order to comply with the Equality Act, reasonable requests should always be accommodated.

2.2 WORKPLACE ADJUSTMENTS

Reasonable adjustments in the workplace vary according to individual need. All adjustment requests should be recorded using the relevant form. For Police Officers who have restrictions to deployment applied for medical reasons should follow the regulations relating to limited duties.

2.3 PROCESS: PERSONAL RISK ASSESSMENT

Please note, prior to commencing the reasonable adjustments process, a personal risk assessment must be carried out. This requirement is in accordance with the provisions of the Management of Health and Safety at Work Regulations 1999 which states a risk assessment is required when an individual has notified the organisation that they are unfit for duty or experience health changes.

Identifying needs in the workplace

In most cases, an individual knows that they have a disability and tells the organisation so that the necessary steps can be taken to meet their needs and maximise their performance at work. However, there are also members of staff who discover a learning difficulty or develop a medical condition later in their career. Managers are advised to be proactive and seek expert advice if they notice any trends such as behavioural differences, discrepancies between ability and performance or recurring health issues; it may be that someone is unaware that they have a disability. It should also be noted that some staff with disabilities might be reluctant to disclose their disability if they fear that the organisation will not respond positively.

Implementing reasonable adjustments

Once an individual's needs have been identified, the reasonable adjustments should be implemented as soon as possible. If there is a delay, the individual should not be placed at a disadvantage. Consideration should be given to providing alternative suitable work or paid leave whilst the reasonable adjustments are awaited if necessary. The following points are critical success factors –

- **Communication** – involve the individual and keep them informed of progress
- **Timeliness** - implement adjustments without undue delay
- **Support** – ensure that the individual has the support they need
- **Risk assessment** – ensure that new equipment or furniture has been risk assessed to ensure no adverse impact on health & safety in the workplace

- **Training & familiarisation** – ensure that the individual is trained in how to use any new equipment – they should be allowed time to adjust to new ways of working or using new technology (this should be taken into account in any performance reviews)
- **Regular review** – the line manager should meet with the individual regularly to ensure that their needs are still being met. The Force has an obligation to review adjustments at least annually but many adjustments will require more frequent reviews, particularly in the initial stages.

Emerging needs

Whilst many reasonable adjustments are made as a 'one-off' solution to assist the individual in their role, there may be times when additional adjustments are required.

For example –

- Following a transfer or re-alignment of responsibilities
- To access a training event/course
- To participate in a career development scheme
- Following a promotion or new role
- Following an intense period of rehabilitation or treatment
- To attend a regional meeting or seminar
- Due to implementation of new working methods or technology
- Following a change in the nature of a condition
- Following a period of absence
- It has been identified that an aspect of the role or workplace is exacerbating the condition
- During a grievance or disciplinary procedure
- Due to a change in personal circumstances
- To alleviate the impact of a period of potential stress at work (i.e. re-structures or implementation of new IT systems)

'Access to Work' funding may be available from Jobcentre Plus to assist in making such adjustments.

Records and confidentiality

Line managers must complete the form and submit to the HR Advisor to ensure that adjustments are recorded and monitored. Adjustments can also be recorded on the OHU Feedback. Adjustments will be recorded on the computerised HR System for monitoring purposes; access to these records is restricted. For Adjusted officers, adjustments can be shown on their passport.

Details of someone's disability should only be disclosed on a 'need to know' basis. Often, it is not the name of the disability that needs to be disclosed but the individual's requirements or the effects of the medical condition or learning disability. For example, if someone is going on a course, the trainer needs to know what reasonable adjustments are required, but may not need to know what the individual's disability is. In any case, managers should consult with the individual.

Please note that under the Equality Act 2010 if a member of staff tells a manager that they have a disability, the organisation is considered to know about the disability and will be expected to fulfil its legal duty to make reasonable adjustments. Therefore, managers should explain to staff that they will need to inform the relevant specialists (i.e. HR/OH but assures staff that details of their disability will only be shared on a 'need to know' basis.

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The Force Personal Emergency Evacuation Plan (PEEP)

Where appropriate, line managers must complete the Force Personal Emergency Evacuation Plan (PEEP) Form in consultation with the individual. This form is used for all disabled employees and other persons who may require assistance to ensure their safe evacuation in the event of a fire/emergency.

2.4 ABSENCE

Disability Related Leave

This section is under review.

Paid leave

Please note that if someone is off work because the organisation has not yet provided the required reasonable adjustments, this is not disability related absence or disability related sickness. It is paid leave because the individual is willing to work, but they are not able to, because the organisation is not fulfilling its duty to make reasonable adjustments.

3. PROCEDURES –

Reasonable adjustments may also be made in the following people management procedures –

- Attendance management - absence monitoring and sick pay
- Probationary performance assessments
- Performance & Development Reviews
- Training and career development schemes
- Issue resolution and discipline procedures
- Transfer, promotion and specialist post selection processes
- Allocation/accessibility of benefits and facilities

This list is not exhaustive and it is important to note that HR will have to liaise with specialists to determine what is reasonable in each individual case.

It is also important to remember to undertake a risk assessment on any reasonable adjustment to ensure that new equipment or furniture does not have an adverse impact on safety in the workplace.

Reasonable adjustments should also be considered within role specific procedures such as -

- Giving evidence in court
- Taking statements
- Taking details from the public
- Driving police vehicles
- Recording or remembering details
- Exercise of police powers
- Sitting on boards or project teams
- Liaising with partner organisations

This may require liaison with other partner organisations and community groups. Again, this will ensure that individuals have what they need in every aspect of their job.

Useful Contacts and further advice

For further advice on disability issues, please contact People Services and ask for your local HR Advisor. You can also speak to the Occupational Health Unit.

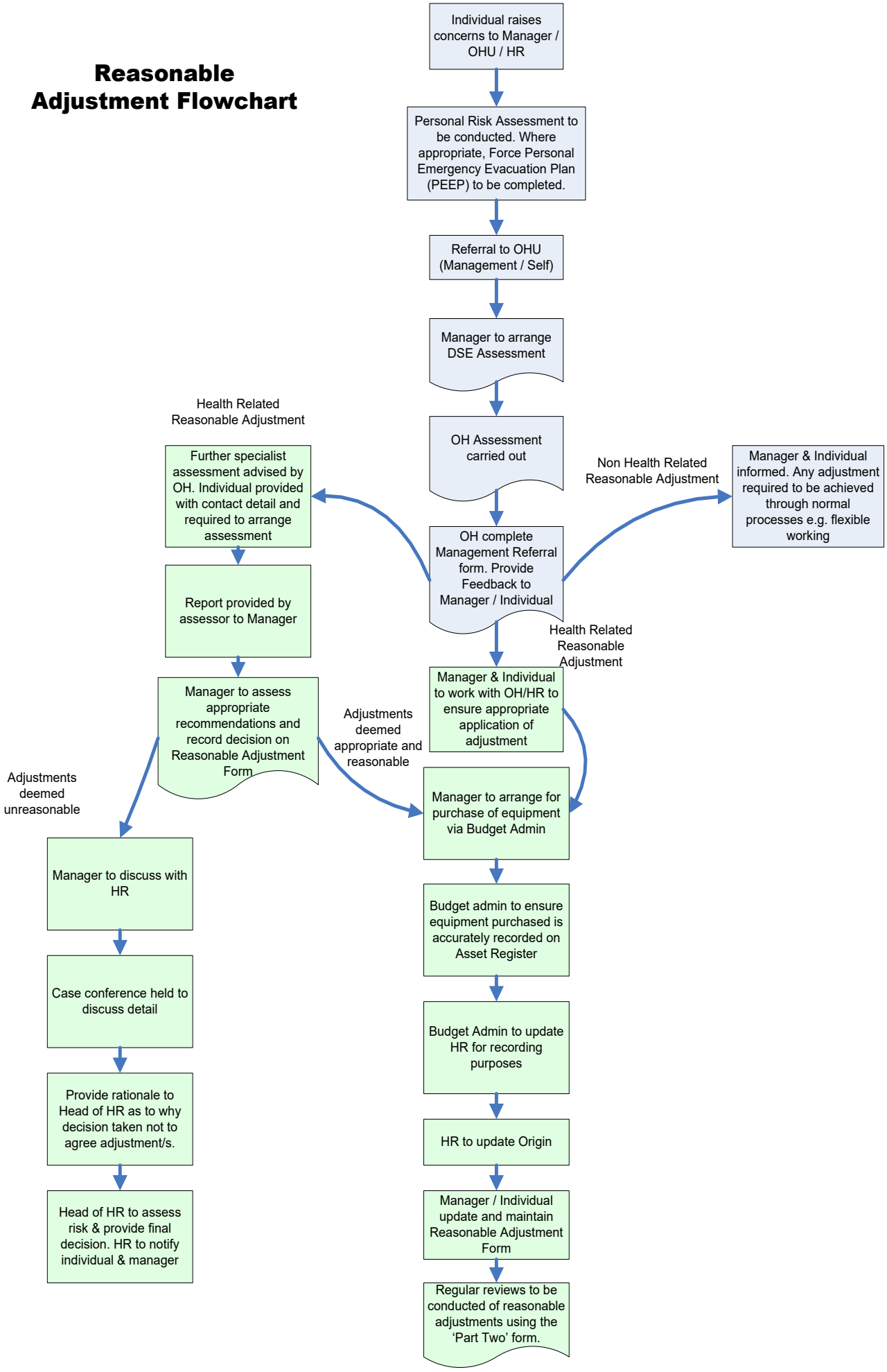
Organisation	Contact details	Services
Disability Employment Advisor, Jobcentre Plus	Jobcentre Plus	▪ Advice on disability issues in the workplace ▪ 'Access to work' funding for reasonable adjustments
Access to Work	Telephone: 0800 169 0154 **Only on phone**	▪ Advice on disability issues in the workplace ▪ 'Access to work' funding for reasonable adjustments
Equalities and Human Rights Commission	Telephone 020 3117 0235 (non helpline calls only) Fax 0203 117 0237 info@equalityhumanrights.com www.equalityhumanrights.com	▪ Equality Act advice/helpline ▪ Code of practice – Equality Act ▪ FAQs website ▪ Conciliation service
Remploy	**Telephone:** 0845 155 2700 **Fax:** 0845 155 2701 **Minicom:** 0845 155 0532 **Email:** info@remploy.co.uk	▪ Support workers to assist employers and individuals ▪ Retention advice ▪ Return to work advice ▪ Equality Act advice
British Council of Disabled People	Tel: 01332 295551 Fax: 01332 295580 Minicom: 01332 295581 E-mail: services@bcodp.org.uk	▪ Transcription service ▪ Training ▪ Consultancy
National Disabled Police Association (Met Police)	Tel: 0207 321 (4) 8717 Fax: 0207 321 8716 Website: Disabled	▪ Support network ▪ Sharing good practice
The Disability equipment Register	Tel: 01454 318818 E-mail: disabreg@blueyonder.co.uk Website: Disability Equipment Service	▪ Nationwide service to buy and sell used disability equipment directly from or to other users
Disability Rights UK	Website: Disability Rights UK Tel: 0330 995 0400 Email:enquiries@disabilityrightsuk.org	▪ Advice, support and general information

Legal Framework and National Guidance

Equality Act 2010
Data Protection Act 2018
Equality Act 2010 (Disability) Regulations 2010 (SI 2010/2128)

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Reasonable Adjustment Flowchart



DOCUMENT ADMINISTRATION

Ownership:

Department Responsible: Equality, Diversity & Inclusion (EDI) Team
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Technical Author(s): Kathryn Carney / EDI Team
Senior Officer/Manager Sponsor: Director of People & Change

Revision History:

Revision Date	Version	Summary of Changes
25.06.2025	2.1	Review and minor amendments. Transgender and the Workplace Policy temporarily removed as this section is under review.
13.05.2026	2.2	Making Reasonable Adjustment Guidance Section 2.4 Absence - Disability Related Leave temporarily removed as this section is under review.

Approvals:

This document requires the following approvals:

Name & Title	Date of Approval	Version
Force Policy Officer	30.06.2020	2.0
Inspector Ben HUGGINS (Head of Equality, Diversity & Inclusion)	23.06.2020	2.0
JNCC	23.10.2018 (via consultation process)	1.0

Distribution:

This document has been distributed via:

Name & Title	Date of Issue	Version
E-Brief		
Email to relevant affected Staff/Officers		
Other: (state method here)		

Diversity Impact Assessment:

Has a DIA been completed? If no, please indicate the date by which it will be completed. If yes, please send a copy of the DIA with the policy to the Force Policy Officer.	☒ **Yes** ☐ **No** **Date**:

Consultation:

List below who you have consulted with on this policy (incl. committees, groups, etc):

Name & Title	Date Consulted	Version
Office of the Police and Crime Commissioner	27.09.2018	0.3
UNISON / Wiltshire Police Federation	27.09.2018	0.3
Wiltshire Ethnic Police Association (WEPA)	27.09.2018	0.3
Positive Action & Equality and Diversity Development Officers	27.09.2018	0.3
Stonewall	27.09.2018	0.3

Implications of the Policy:

Training Requirements

There are no additional training requirements

IT Infrastructure

No additional IT infrastructure required.