Equality Policy Statement for Customer Service Delivery

1. Introduction

1.1 Canal & River Trust is the charity and statutory undertaker which manages a 2,000 mile network of historic canals and navigable rivers in England and Wales.

1.2 We value the diversity of views and opinions that a diverse customer base can bring. We are committed to creating an inclusive environment for all, and to protecting equality of opportunity for all our customers.

1.3 The purpose of this document is to set out:

- the general terms of our policy regarding improving accessibility to our network and the services associated with it;
- the basic principles of our commitment to provide reasonable adjustments to those with disabilities or long-term conditions; and
- the factors we will consider when dealing with requests for reasonable adjustments.

1.4 This policy statement applies to anyone accessing our services.

2. Legal Obligations under the Equality Act 2010

2.1 The Equality Act 2010 ("the Act") provides a legislative framework to protect the rights of individuals and to advance equality of opportunity for all.

2.2 As a service provider, we have a duty under the Act to not unlawfully discriminate by way of less favourable treatment, victimise, or harass a customer on the grounds of the 'protected characteristics' (as defined within the Act).



2.3 We may lawfully apply a policy or practice that puts persons with a protected characteristic at a disadvantage if doing so is a proportionate means of achieving a legitimate aim.

2.4 We also have a specific duty under the Act, to make reasonable adjustments in 3 circumstances:

- Where a provision, criterion, or practice puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled;
- where a physical feature puts a disabled person at a substantial disadvantage in comparison with persons who are not disabled; and
- where a disabled person would, but for the provision of an auxiliary aid, be put at a substantial disadvantage in comparison with persons who are not disabled.

2.5 "Disability" is defined by the Act as "a physical or mental impairment, and the impairment has a substantial and adverse effect on the person's ability to carry out normal day-to-day activities."

2.6 "Substantial disadvantage" is defined by the Act as being more than "minor or trivial".

2.7 There are circumstances where we may not have to make adjustments. This could be when those adjustments would fundamentally alter the nature of our service, trade or profession, or where we do not have the power to make the requested adjustment.

2.8 Where we exercise a public function, we also have a Public Sector Equality Duty. This means that we must have due regard to the need to eliminate discrimination, advance equality of opportunity, and to foster good relations between all people who share a relevant protected characteristic and persons who do not share it, when carrying out its duties.

3. How we deliver our services

3.1 As a diverse organisation, we provide a wide variety of services, including but not limited to navigation management, customer service, and asset management.

3.2 We must proactively ask you, our customers, if you need support or reasonable adjustments when accessing our services. We will do this by:

- including a paragraph in our written communication with you that proactively asks if you need adjustments or support, and tell you how to access them;
- asking you over the phone whether you need a reasonable adjustment;
- including a note on our published documents indicating that we can provide the document in an alternative format if you request this; and
- by publishing this policy on our website.

4. Types of reasonable adjustment we can offer

4.1 We have done our best to anticipate the types of reasonable adjustment which you might need to access our services; however, there is no prescribed list of reasonable adjustments.

4.2 Reasonable adjustments will depend upon:

- your individual needs;
- the barriers/difficulties you are experiencing when accessing our services; and
- what is reasonable for us to provide.

4.3 Examples of reasonable adjustments we can provide are by:

- providing information to you in appropriate alternative formats; e.g. large print, coloured paper;
- communicating with you through a representative or intermediary;
- extending time limits to allow you to comply with boat licensing requirements;
- providing you with alternative access to live online mooring auctions, such as pre-submitted bids;
- adjusting payment terms for you.

5. Our response to requests for reasonable adjustments

5.1 In many cases, we will be able to grant the reasonable adjustment without needing further information or evidence from you; however, in some cases, we may request further information and/or evidence. For example, we will request that an Equalities Questionnaire is completed for reasonable adjustments to the terms of a boat licence.

6. How do we decide what is reasonable?

6.1 The Act does not define what is "reasonable", but guidance from the Equality and Human Rights Commission suggests that the most relevant factors are:

- Effectiveness - how well does the adjustment in question remove or at least minimise a disadvantage?
- Practicability - how practical is the adjustment? For example, how long will it take to implement, will anyone need extra training, etc.
- Cost - for example, how much will it cost, what financial resources are available to the Trust?
- Disruption - how disruptive to the Trust, to others, and to the Trust's needs would it be to make this adjustment?
- Risk - would making this adjustment cause any risk to others? An adjustment will not be reasonable if anyone's health and safety would be compromised by making that adjustment.

6.2 The reasonable adjustment should be designed to fully address the disadvantage or barrier it is meant to overcome. We will evaluate the reasonableness of an adjustment against the available resource. In changing policies, criteria, or practices, we seek to avoid or correct disadvantages that a person with a disability might face in accessing our services but will not change the basic services offered.

6.3 When we do not consider an adjustment is reasonable, we will communicate an adjustment that we do deem reasonable, which considers your original request and needs as much as possible.

7. Monitoring reasonable adjustments

7.1 We will record and monitor the reasonable adjustments granted to ensure they last for the appropriate period. This will allow us to continually review the way in which we offer services and identify available steps we can take to improve the services we provide.

8. Dealing with complaints about our service

8.1 Please refer to our complaints policy.

9. Training

9.1 We will provide relevant Trust employees, volunteers and representatives with appropriate equity, equality, and diversity training where necessary, which will be updated as required.

10. Review Date

10.1 We will review this policy statement annually and publish updates to our website.





David Orr CBE

Chair to the Board of Trustees

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Chief Executive

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