



Cairngorms National Park Authority Neurodiversity Policy

Introduction and Purpose

1. The Cairngorms National Park Authority values and respects the variety of skills, experiences and diversity of its staff group. We adhere to the principle that all workers deserve opportunities, encouragement and support to realise their full potential, and to deliver the tasks and responsibilities of the job and at the grade that they were appointed to.
2. This policy covers the approach of the Cairngorms National Park Authority towards staff, and potential staff, who are neurodivergent, or who believe that they may be neurodivergent. The scope of this policy covers conditions including, but not limited to: autism spectrum conditions, ADHD, dyslexia, dyspraxia, and dyscalculia (see appendix 1).

Principles

3. The Cairngorms National Park Authority believes that:
 - a. A diversity of cognitive approaches is a source of great strength and value within a genuinely inclusive workplace.
 - b. All reasonable steps must be taken to ensure that policies, practices and culture do not discriminate against neurodivergent people.
4. The Authority recognises that:
 - a. Neurodivergent people may not have a formal diagnosis or assessment, that a lack of diagnostic support can be a barrier within the workplace for both staff and employers, and that workers must not be subject to unfavourable treatment if they choose to disclose a neurodivergent condition.
 - b. People who are neurodivergent can face discrimination and stigma in wider society, that they may be unwilling to disclose a diagnosis or assessment, and that staff must not be subject to unfavourable treatment because they choose to not disclose a neurodivergent condition.
 - c. Each person is unique and that there can be a high degree of overlap between neurodivergent conditions, and that consequently any support needs must be identified and implemented on the basis of personal evaluation and individual consultation, managed on a case-by-case basis, and with advice and guidance from the Park Authority's Occupational Health provider where appropriate.
5. The Authority commits to:



- a. Support workers to obtain a diagnosis or assessment should they want one.
- b. Encourage early disclosure within a genuinely supportive and inclusive environment.
- c. Work to eliminate barriers (including prejudice) that neurodivergent people can face in the workplace.
- d. Take all reasonable steps to ensure that internal communications, training programmes, and testing requirements (such as to complete training courses) are accessible for neurodivergent workers.
- e. Raise awareness of neurodiversity in the workplace.
- f. Consider changes made in response to requests and take steps to eliminate potentially discriminatory practices in the course of day-to-day activities.

Getting and disclosing a diagnosis or assessment

6. The Authority agrees to consider all requests for support for the purpose of obtaining a diagnosis within a timely fashion. Such support may be in the form of time off work to attend appointments, the provision of information, and advice/support from the Occupational Health provider, via an individual consultation through an Occupational Health referral.
7. We will agree to all reasonable requests for diagnostic support within a timely fashion. If a request is refused, we will explain our reasons for doing so in writing.
8. We want to foster a workplace where it is natural for staff to disclose neurodivergent conditions to the Park Authority, either to their line manager or through the HR team. We do however recognise that staff are under no legal or professional obligation to disclose a neurodivergent condition.
9. All new staff will be given the opportunity to disclose neurodivergent conditions and explore reasonable adjustments through the Staff Health Questionnaire, which is administered by the HR team. Prior to this, there are 3 opportunities during the on-boarding process to disclose a neurodiverse condition – these include two opportunities at application stage, and another opportunity at interview stage.
10. As neurodivergent conditions are lifelong, we will accept previous assessments undertaken by appropriately qualified persons as sufficient evidence that an employee is neurodivergent. Such assessments may include reports by specialist consultants, educational psychologists' reports, specialist Statements of Special Educational Need ('Statements') and Education, Health and Care Plans ('EHCPs').



Access to Work and Workplace Needs Assessments

11. The Authority will take all reasonable steps to assist workers with applications for Access to Work ('AtW') support if such support is requested, and to facilitate Workplace Needs Assessments which may be conducted by AtW or independent consultants, or via the Authority's Occupational Health provider.

Reasonable adjustments

12. The Authority recognises its role to be proactive about discussing and recommending reasonable adjustments when an employee discloses a neurodiversity condition, and that the sole onus on identifying adjustments should not rest with the employee. Appendix 2 lists some further reasonable adjustments that may be appropriate to support neurodivergent staff, and which should be discussed with an employee who discloses neurodivergent condition.
13. The Authority recognises that most requests for reasonable adjustments are not expensive or difficult to implement, and also that such adjustments can make a significant difference to the wellbeing and performance of neurodivergent workers. We will therefore consider all requests for reasonable adjustments and respond to them in a timely fashion.
14. We recognise that neurodivergent workers often have a clear prior understanding of the reasonable adjustments that would best support them, and that many neurodivergent workers will not require an external assessment of workplace needs.
15. If there are compelling reasons for not accepting a request for a reasonable adjustment, we will try to identify alternative reasonable adjustments that achieve that same aim. If a request for a reasonable adjustment is refused, we will set out our reasons for doing so in writing in a timely fashion
16. The Park Authority recognises that many neurodivergent workers have developed coping strategies and that not all neurodivergent workers will require reasonable adjustments. We further recognise that neurodivergent workers may have dual or multiple diagnoses or assessments, and that reasonable adjustments should be based on the unique needs of the individual. If an employee considers that a recommendation for a reasonable adjustment made in their case is inappropriate for any reason and does not want that recommendation to be implemented in their case, then that will constitute an 'exceptional reason' for refusing a recommendation. No employee will be



forced to comply with a reasonable adjustment recommendation against their will. In these circumstances, a written record of refusal (or discontinuation) of a reasonable adjustment will be kept.

17. The Park Authority recognises that there may be staff who, while not neurodivergent themselves, may have caring responsibilities towards people who are neurodivergent (such as parents of children identified as having special educational needs). Every reasonable effort will be made to accommodate requests for leave (or similar requests) that are made in connection with those responsibilities.
18. As a minimum standard, the Park Authority commits to ensuring that all meetings that last more than an hour will have a 5-minute break built in to the meeting agenda. It will be the responsibility of the meeting organiser to ensure this break is scheduled, but if it is not scheduled, any member of staff attending the meeting is encouraged and supported to request that break.

Performance management and capability proceedings

19. The Authority recognises that standardised employment practices can be barriers to neurodivergent employees' performance. We will use the performance management processes as an opportunity to review and improve support for neurodivergent employees, and to identify barriers that can reasonably be removed. Notwithstanding this support, the performance management process is in place to help employees achieve their potential, be effective in their work and make a positive contribution to the delivery of the Authority's objectives. Key to this is that all staff have realistic job plans that clearly set out the tasks and responsibilities expected of them, which are aligned to the grade and role they have been appointed to.
20. Where an employee has disclosed a neurodiverse condition, it is incumbent on the line manager to ensure the Performance Development Conversations include a discussion about required support, to ensure they are fully able to discharge the responsibilities of the role.
21. An employee who is neurodivergent can still be subject to performance management, but the process may be adjusted to take account of their neurodiversity. When concerns about an employee's performance are linked to a neurodivergent condition, performance management or capability proceedings may be halted until any accepted reasonable adjustments have been made and formal proceedings may be extended by an appropriate amount of time to allow those adjustments to take effect. We will take advice from our Occupational Health provider regarding what an



appropriate time extension may be, based on an OH consultation with the individual. This means each person will be treated on a case-by-case basis, and adjustments taken for one individual cannot be assumed to create a precedent for another.

Recruitment, and progression

22. Neurodivergent employees and applicants will not be discriminated against during recruitment, progression and promotion processes.
23. Recruitment advertising will encourage job applicants to disclose medical conditions and request adjustments to recruitment, application and interview processes, which for a neurodivergent job applicant may for example be a visit to the interview location and meeting panel members in advance of the interview so as to familiarise themselves with the environment and panel.

Awareness and training

24. Neurodiversity will be incorporated into existing equality and diversity training programmes.
25. All managers will receive neurodiversity training.
26. The Internal Equality, Diversity and Inclusion Advocacy Group will be help to raise awareness in the workplace and act as a point of contact with the Park Authority, including for the sharing of guidance and best practice, and for neurodiverse staff who may want to establish a networking group for peer support, guidance and advice.

Agreement coverage

27. This policy applies to all direct employees, contract and agency workers, and volunteers working for the Authority

Support for partners, stakeholders and customers of Park Authority-organised events

28. Whilst this policy is an internal facing one, staff should also consider the equalities needs of people when arranging consultation events for customers and stakeholders. Event guidance will be established to support this

Legislative compliance



29. This policy complies with current employment legislation: The Equality Act 2010 prohibit discrimination against, and the victimisation and harassment of, people who are disabled for the purposes of that Act. Under the Equality Act, employers also have a duty to implement reasonable adjustments for employees with disabilities. The Government's statutory guidance states that a disability can consist of a 'developmental [condition], such as autistic spectrum disorders (ASD), dyslexia and dyspraxia.'
30. Public sector employers also have a duty within Equality Act to have due regard to the need to eliminate prohibited conduct (including discrimination), advance equality of opportunity and foster good relations for people with a disability.

Relationship with existing policies

31. This policy should be read in conjunction with other relevant Park Authority policies and the principles enshrined in our culture and values. These policies include the Performance Management Policy, Capability Policy, Absence Policy, Probation Policy and Reasonable Adjustments Policy.

Policy Adopted 20 March 2023



Appendix 1 – language and definitions

NEURODIVERSITY

Neurodiversity is the idea that there are natural and normal variations in the way that people think and process information; and that different cognitive profiles can present both strengths and challenges depending on the environment people work in.

NEURODIVERGENCE

Someone is neurodivergent if they have a cognitive profile that differs from that of the majority. For example, a person with dyslexia may be said to be neurodivergent.

DISABILITY

The term disability is used in this policy in the same sense that it is employed by the Equality Act 2010: a long-term physical or mental impairment that has a substantial adverse effect on a person's ability to carry out normal day-to-day activities.

CONDITIONS

The use of this term does not indicate a preference on behalf of the Authority for a medical over a social model of disability.

Examples of neurodivergent conditions

Every neurodivergent person has a unique cognitive profile. Each of the conditions listed below may be described as a spectrum and there will be a high degree of variation between people who share the same diagnostic label. Overlap between different diagnoses is also common. No two people are the same. The below section is therefore neither a prescriptive nor exhaustive list of conditions or characteristics, and it should be used for initial reference only.

ADHD Attention Deficit and Hyperactivity Disorder. People with ADHD may experience problems with focus or be distracted from some tasks. Conversely, people with ADHD may demonstrate a very high degree of focus on other tasks ('hyperfocus') and require different stimulation levels to a typical worker. Workers with ADHD can excel in potentially intensive work environments.

AUTISM Diagnoses that fall under the umbrella of Autism Spectrum Conditions (ASC) include Asperger's Syndrome and Pervasive Developmental Disorder Not Otherwise Specified (PDD – NOS). Many autistic people can appear highly articulate and are able to work productively in many roles and sectors, but may struggle to understand the complexities of social interaction. Sensory inputs such as noise, heat, light and touch can be an issue for many people on the autism spectrum.



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DYSLEXIA Dyslexia is often characterised by problems with reading and writing, although a dyslexic person may encounter other challenges connected to cognitive tasks, such as sequencing, processing of information, working memory, and phonological processing. The NHS states that 'people with dyslexia often have good skills in other areas, such as creative thinking and problem solving.'

DYSPRAXIA Also known as Developmental Co-ordination Disorder ('DCD'). Dyspraxic people may encounter problems with fine and/or gross motor activities. This may present challenges for activities that involve handwriting and some manual task. Other common characteristics include atypical responses to sensory inputs, and problems with organisation. The Dyspraxia Foundation says that 'persistence, determination and extremely hard working are all characteristics associated with dyspraxia.'

DYSCALCULIA Dyscalculia is a neurological condition that may affect mathematical functions. Although this condition is sometimes described as being comparable to dyslexia, research is at an earlier stage and someone who is dyscalculic may not also be dyslexic.

DYSGRAPHIA Dysgraphia involves neurological difficulties with the act of handwriting and potentially other fine motor skills, such as spelling and finger sequencing (which may affect typing)



Appendix 2 – examples of Reasonable Adjustments

This appendix is not intended as a comprehensive list and recognises that reasonable adjustments should be based on the unique needs of the individual and based on a competent assessment of their specific needs.

It should be remembered that symptoms and challenges are often on a spectrum and can vary over time and from person to person, depending on a range of environmental and social factors. Over time and across domains, implemented reasonable adjustments may become less effective and other reasonable adjustments may be more appropriate. Therefore, when identifying reasonable adjustments, it should be seen as part of a process that requires monitoring and one that can accommodate change where need is identified.

Rather than identifying reasonable adjustments on the basis of specific conditions, the examples are grouped according to presentations that may be unique to or shared by a number of conditions. It is unlikely that any one individual will be affected by all of them.

Challenge:

Concentration and focus, distractibility, procrastination, fatigue

Examples of reasonable adjustments:

- Schedule short breaks away from desk throughout the day. The frequency of these may vary according to the task
- Schedule regular breaks in meetings, at least once every hour
- Where possible, the staff member should try to arrange their workloads that allow them to focus on one job at a time rather than multi-tasking which may result in distraction.
- Staff member can set a regular timer on phone, PC or other device to bring them back to focus should they tend to go off track – can be visual or auditory. This needs to be intrusive enough for them to notice it.
- Staff member may block out periods of time in their calendar and / or use the “do not disturb” sign/function on their telephone and email, when specific tasks require intense concentration.
- Staff member may either access a delegated quiet space away from distractions in the office, or work from home if they need to concentrate on specific tasks.
- Noise cancelling headphones may be used to block out external distractions.
- Anti-glare screen filters, such as tinted or blue light glasses, may help improve concentration and reduce fatigue.

Challenge:

Hyperactivity

Examples of reasonable adjustments:



- Schedule short breaks away from desk throughout the day. Movement can help with symptoms so actions such as walking in office rather than internal phone/email are encouraged .
- Staff member may benefit from 'fidget' toys or stress ball while working. This may be small and discrete.

Challenge:

Social interaction and communication

Examples of reasonable adjustments:

- Line managers should use clear language and issue specific instructions when assigning roles and tasks. If requested roles, tasks and instructions should be provided in written form.
- Line managers or other staff may be asked to demonstrate and / or supervise assigned tasks.
- Provide staff member with means to easily take and store notes. For example, a digital recorder and speech to text software or a tablet with a stylus and handwriting to text software.
- Staff member may request an office mentor – maybe line manager, colleague, buddy arrangement. Someone who can help you build awareness of how you communicate and any other issues with social cues. They can help defuse difficult social situations before they become too large.
- Quiet spaces should be available to help manage anxiety and potential burn-out.
- A neurodiversity disclaimer in the e-mail signature may be helpful for those who feel comfortable about being open about their neurodiversity as it raises awareness, normalises neurodiversity, helps to manage expectations and prompts action with respect to failures to respond to e-mails etc

Challenge:

Arithmetic

Examples of reasonable adjustments:

- Staff member should allocate more time than usual for any tasks that involve arithmetic
- Line managers to provide written rather than verbal instructions
- If possible mathematical data to be available in a visual way e.g. graphs, charts and infographics

Challenge:

Reading and writing



Examples of reasonable adjustments:

- Provide staff member with literacy support tools, such as a Reading Pen and / or screen reading and proofreading software, such as ReadWrite. Microsoft Dictation Function allows speech to text dictation
- Provide staff member with tinted glasses / coloured filters for reading documents on computer screens and paper.
- Exempt staff member from tasks such as taking the minutes of meetings (or with permission from other users, meetings could be recorded for write up at a later stage) or reading text out loud, which may be difficult for them and cause stress.
- Allow plenty of time for staff member to read and complete tasks.
- Allow plenty of time for staff member and / or line manager to proofread work.
- If possible, information to be provided in a way that avoids lots of reading e.g. audio or videotape, drawings, diagrams and flowcharts.
- Dragon Naturally Speaking software can be beneficial for those who prefer verbal communication to be written or typed communication. It allows the user to dictate to type, and works well with Powerpoint and PDFs

Challenge:

Executive function, organisation, planning and memory

Examples of reasonable adjustments:

- Executive Function coaching and Cognitive Behaviour Therapy may help staff member manage their symptoms and establish beneficial habits.
- Provide staff member with tools to conveniently manage time and tasks, for example a tablet, mobile phone, Filofax, pinboard and / or wall planner. Mobile devices such as tablets or phones to provide access to calendars and schedule alerts or alarms when away from desk.
- Provide staff member with mind-mapping software, such as Mindmapper, Inspiration, Claro Reader or Mind Genius, to help plan, organise and prioritise tasks, projects and information using diagrams and flowcharts.
- Provide staff member with dual screens so that tasks that require having many documents open are easier to manage.
- Line managers to ensure that clear deadlines are set for tasks, provide timely reminders and conduct regular reviews of priorities and projects.
- Staff members should be encouraged and supported to block out time each day or week to carry out admin and planning tasks.
- Allow staff member extra time for tasks and projects, for unforeseen circumstances.
- Templates can be helpful for writing detailed work, such as reports.



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- Having information digitally can cause increased need for processing and use of short term memory due to having to move between screens and hold information. Having access to printed hard copies of documents can reduce this.
- Use of highlighters and coloured pens can help break down large sections of information and identify key points, or help group information which can help the individual to make connections or link information.