

# Reasonable Adjustment Digital Flag Policy

## Table of contents

<b>1</b>	<b>Introduction</b>	<b>2</b>
1.1	Policy statement	2
1.2	Status	2
<b>2</b>	<b>Policy</b>	<b>2</b>
2.1	Understanding the Reasonable Adjustment Digital Flag	2
2.2	Compliance timescales	2
2.3	Phase 1 actions	2
2.4	Identifying using the TEACH model	2
2.5	Categories and types of adjustments	3
2.6	Recording of reasonable adjustments	3
2.7	How to create a local digital flag	3
2.8	Consent to share	3
2.9	How to share identified reasonable adjustment needs	3
2.10	Reviewing reasonable adjustments	4
2.11	Audit	4
2.12	Making information accessible	5
2.13	Environmental considerations	5
2.14	Phase 2	5
2.15	Adjustment flag in NCRS	5
2.16	Training	5
2.17	Additional resources	5
	<b>Annex A – TEACH model</b>	<b>7</b>

# 1 Introduction

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## 1.1 Policy statement

This policy outlines how this organisation will ensure compliance with the [Reasonable Adjustment Digital Flag Information Standard](#) (the Standard herein), thereby ensuring all patients inclusively can access the services provided when they need to.

## 1.2 Status

In accordance with the [Equality Act 2010](#), we have considered how provisions within this policy might impact on different groups and individuals. This document and any procedures contained within it are non-contractual which means they may be modified or withdrawn at any time. They apply to all employees and contractors working for the organisation.

# 2 Policy

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## 2.1 Understanding the Reasonable Adjustment Digital Flag

[NHS England](#) explains that the Reasonable Adjustment Digital Flag is a national record that indicates that reasonable adjustments are required for an individual and optionally includes details of their significant impairments, the key adjustments that should be considered and underlying conditions.

## 2.2 Compliance timescales

Full conformance with the standard is required by 31 December 2025. Prior to this, the organisation is required to have completed:

- [Phase 1](#): Identify, record, flag, share, meet and review reasonable adjustments at a local level (by no later than April 2024)
- [Phase 2](#): Flag and share reasonable adjustments using the Reasonable Adjustment Flag on the NHS Spine. Technical integration is to have commenced by 30 June 2024, with full conformance achieved by 31 December 2025.

## 2.3 Phase 1 actions

This organisation will achieve compliance by completing the two actions detailed on the [Reasonable Adjustment Digital Flag action checklist](#).

## 2.4 Identifying using the TEACH model

The TEACH model at [Annex A](#) can be used to help staff at this organisation to identify the reasonable adjustment needs of patients.

## 2.5 Categories and types of adjustments

[NHS Digital](#) provides examples of the categories of adjustments and the types of adjustments.

## 2.6 Recording of reasonable adjustments

Reasonable adjustment requirements must be recorded using established codes. This organisation will use the reasonable adjustments impairment and adjustment codes provided by [NHS Digital](#) when recording reasonable adjustments.

Furthermore, [Appendix B of the Requirements Specification](#) provides SNOMED CT codes grouped by category.

## 2.7 How to create a local digital flag

The flag must be highly visible, obvious and apparent and appear on every page of the electronic healthcare record (as an alert, flag or banner). This ensures that staff are prompted and can respond to the individual's reasonable adjustment requirements.

This organisation will use the SNOMED code "requires reasonable adjustment for health and care access (Equality Act 2010) 1108111000000107" for the identification of identified reasonable adjustments (a local digital flag). Detailed guidance on how to create alerts is available in the clinical record system user guide.

An example of a flag that can be created has been provided by NHS Digital in the form of a [case study](#).

## 2.8 Consent to share

[NHS England](#) explains that consent must be obtained to share the Reasonable Adjustment Digital Flag on the NHS Spine. Staff must ask patients if information can be shared and record consent. Suggested wording for the question is "Are you happy for this to be shared with other organisations in the NHS and social care that will be involved in your care?".

Should a patient lack capacity to make a decision to agree or decline to share, then a capacity assessment may need to be made and/or a best interests decision made.

Consent must be recorded using the consent code "consent given to upload data to Reasonable Adjustment Digital Flag (finding) 1853771000000105".

## 2.9 How to share identified reasonable adjustment needs

This organisation must ensure that a patient's reasonable adjustment needs are shared appropriately, such as when the patient is referred or signposted to other organisations. When a referral is made, staff are to ensure that under the identifying demographic section, reasonable adjustments are annotated. The [Implementation Guidance](#) offers the following example:

EXAMPLE	
<b>Name:</b>	Miss Example Patient
<b>Address:</b>	Anyhouse, 10 Anytown Street, Anytown
<b>DOB:</b>	1.1.00
<b>Reasonable Adjustments identified:</b> Requires reasonable adjustment for health and care access (Equality Act 2010). Uses non-verbal communication, Anxiety related to clinical environment (please allow Miss Patient to wait in a quiet environment and consider an appointment at the start of a clinical session to reduce waiting times). A Reasonable Adjustment Flag is present on the National Care Records System.	

Staff at this organisation must ensure information is extant and reflects the needs of the individual.

## 2.10 Reviewing reasonable adjustments

It is likely the needs of patients will change over time; therefore, any recorded reasonable adjustments are to be reviewed and updated (when applicable) to ensure the needs of the patient continue to be met. This organisation will use the following opportunities to review reasonable adjustments:

Standardised review	<ul style="list-style-type: none"> <li>Annual healthcare check</li> <li>Long term condition annual reviews</li> </ul>
Proactive review	<ul style="list-style-type: none"> <li>Searches to identify those not reviewed in the defined review period</li> <li>Invitation to review on any invitations for screening or other routine, planned care</li> <li>Flu clinics</li> </ul>
Reactive review	<ul style="list-style-type: none"> <li>Opportunistic review on diagnosis of a new condition or impairment</li> <li>Patient/carer self-presentation</li> </ul>

Staff at this organisation must maximise the opportunities to review patients and update their Reasonable Adjustment Flag accordingly.

## 2.11 Audit

To monitor compliance with this policy, audits will be undertaken to ensure the needs of patients are met and continuously reviewed and updated as detailed above at Section 2.9. Audits are to take into consideration the conformance criteria detailed in the [Reasonable Adjustment Digital Flag – Requirements Specification](#).

## 2.12 Making information accessible

Staff must ensure that they adhere to the organisation's Accessible Information Standard Policy and provide information to patients that meets their language and communication needs. This includes providing individuals with alternative ways of communicating with the organisation (such as via email, text or telephone) and the provision of information in alternative formats (i.e., braille, easy read, large print etc.).

This policy should be read in conjunction with the [CQC's GP mythbuster 20: Making information accessible and its document titled Meeting the Accessible Information Standard](#).

This organisation has an Accessibility Statement that applies to the organisation's website.

## 2.13 Environmental considerations

Staff must be mindful of the need to meet any preferred environmental requirements of patients with a reasonable adjustment flag. To ensure such needs are met, it is imperative that the flag contains all the relevant information, for example, "Requires distraction technique whilst undergoing care procedure" or "Requires approach to care to be discussed with carer". A detailed example can be found at [Appendix A of the Implementation Guidance](#).

Furthermore, to better involve patients in their own care, staff must adhere to the guidance detailed in the organisation's Shared Decision Making Policy.

## 2.14 Phase 2

The Reasonable Adjustment Digital Flag is held on the National Care Records Service (NCRS). A messaging specification has been developed to support this Standard: a [Fast Healthcare Interoperability Resource](#) (FHIR®) [Application Programme Interface](#) (API). This will be the main source for future integration of Reasonable Adjustment Digital Flag information. This organisation must ensure that the clinical IT system has built-in support for such interfaces.

The integration will notify any individual involved in the care of the patient that reasonable adjustments are necessary.

## 2.15 Adjustment flag in NCRS

NHS Digital has provided [guidance](#) on using the reasonable adjustment flag in NCRS.

## 2.16 Training

**2.17 All staff are to complete 'An introduction to the Reasonable Adjustment Digital Flag' eLearning which is accessible via Agillio Teamnet training page.**

## 2.18 Additional resources

A [good practice resource package](#) is accessible via FutureNHS (login required) and this organisation will use resources appropriately to promote the Reasonable Adjustment Digital Flag to patients.

## Annex A – TEACH model

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The following information was sourced from Hertfordshire County Council's Handbook and information on the Purple Pledge of Principles Recognition.

Time	Does the person find it hard attending health appointments at a certain time of day? Does the person need extra time for them to feel relaxed so that they can accept treatment? Does the person need extra time to explain things?
Environment	Would the person be more likely to be relaxed and accept health treatment if they are in a place they know well? Does the person dislike noises, busy spaces or new places? What can be done to make it easier?
Attitude	If the person is anxious, what can be done to help them relax so that they are more likely to get the same treatment as someone else?
Communication	How should people talk to the person? Are there things that they hate people saying or doing? Does the person have a favourite subject that they like to chat about that helps them to feel relaxed? Are there things the person likes to show people to help them settle? Does the person need things written down or drawn to help them understand better?
Help	Does the person have any reasonable adjustments recorded, showing what they need and what they usually communicate and behave like, so staff can recognise signs of change?

Staff at this organisation should take the above into consideration when determining what reasonable adjustments are required to meet the needs of the patient.