

Reasonable adjustments

Supporting claimants through the Employment and Support Allowance application process





How does this pack help our clients?

What is this pack about?

This pack is about the 3D's:

- if your client is **disabled**, and
- their health condition means they are disadvantaged because of the way a public authority does things
- the public authority has a duty to change the way that they do things

In other words:

- your client, who is disabled, is applying for Employment and Support Allowance (ESA), and
- they are substantially disadvantaged by something in the application process because of their health condition, then
- the DWP has a duty to make reasonable adjustments to the process that will remove that disadvantage

Why? This pack will help you support your clients who are disabled to:

- Understand and use their rights to reasonable adjustments during the ESA Work Capability Assessment and mandatory reconsideration processes.
- Seek positive changes to their experience of these processes.
- Represent themselves so they are not unnecessarily subjected to incorrect decisions or sanctions.
- Complain if changes are not made (particularly if this leads to sanction or benefit delays).

Who? This pack is for:

Advice workers

How? This pack can help you to:

- Support individuals to understand their rights and challenge discrimination
- Support claimants to request reasonable adjustments to claim processes including claimant commitments
- Support advisers to be proactive about reasonable adjustments and the ESA claim process
- Improve the experience of local people claiming ESA
- Feed into the national campaign to make ESA fit for work, with further information on reasonable adjustments requests and complaints
- Overcome the potential adverse health impacts of jobseeker requirements
- Prevent sanctions
- Highlight key issues with local stakeholders and media
- Develop sustainable methods for sharing information and monitoring
- Leverage change through your advice and campaign work.

Contents

Section	Covering	Page
1.	Is your organisation disability aware and confident?	<u>4</u>
2.	What issues are your ESA clients facing?	<u>5</u>
3.	Creating your own action plan and engaging your staff	<u>6</u>
4.	Talking to clients about reasonable adjustments	<u>7</u>
5.	Suggested adjustments	<u>8</u>
6.	Making a request for a reasonable adjustment	<u>10</u>
7.	Following up if a reasonable adjustment is not made	<u>11</u>
8.	Campaigning	<u>12</u>
9.	Showing how it makes a difference	<u>13</u>
10.	Engaging with local disabled people user-led organisations (DPULO)	<u>15</u>
11.	Further help and other resources	<u>16</u>
12.	Your organisation and reasonable adjustments	<u>17</u>
13.	Resources and templates (available separately)	<u>18</u>

1. Is your organisation disability aware and confident?

What do we think about when we use the word disability or hear other people use it? What do we think when we say a client is disabled? Do we see them as someone who is a problem? This short introduction gives you some of the answers. Let's start off with: a disabled client is not someone who is a problem!

Many of our clients have long term health conditions, physical or mental impairments. Sometimes a health condition or impairment means we cannot easily do all activities – in fact most of us can't do everything!

The 'social model of disability' suggests that our health limitations or impairments (whether physical, sensory, intellectual, or psychological) are not disabilities in themselves. It is the practical barriers, negative attitudes and social exclusion that individuals experience as a result of their individual differences that play a significant part in disabling people.

To put it simply, it's not people who are themselves 'disabled', but they are disadvantaged or disabled by the ways we expect people to participate in society. For example, a wheelchair user is 'disabled' in spaces where steps are used instead of ramps. A blind person is 'disabled' where information is not available in braille or another non-written format.

This isn't just political correctness; it is about understanding how disadvantage is caused. If we say someone has a disability it suggests that they are bringing a problem with them; that they need special treatment. But the social model says that the individual is not the problem, instead it is often the way that society works and treats them that causes the problem.

Resources

- A 4.5min Winnie the Witch story which explains the social model¹
- A cartoon on the social model of disability²
- There is an on-going debate about the usefulness and limits of the social model and especially how this understanding fits in with ESA and campaigns around ESA – find out more here³
- The DWP <u>Disability Confident</u> campaign⁴
- RNIB knowledge and research hub⁵ useful info and stats, including the evidence based reviews
- Look out for #EndTheAwkward⁶, a new campaign by Scope
- Check out <u>Support Not Sanctions</u>⁷, a campaign on back-to-work support led by Mind.

¹ http://www.scope.org.uk/campaigns/inclusion-and-participation/disabled-children-books/social-model-disability

² http://www.youtube.com/watch?v=9s3NZaLhcc4

http://jennymorrisnet.blogspot.co.uk/2013/09/welfare-reform-and-social-model-of.html?m=1

⁴ https://www.gov.uk/government/publications/the-disability-confident-campaign

http://www.rnib.org.uk/knowledge-and-research-hub-research-reports/evidence-based-reviews

http://www.scope.org/awkward

⁷ http://www.mind.org.uk/news-campaigns/campaigns/benefits/support,-not-sanctions/

2. What issues are your ESA clients facing?

Clients with long-term health conditions or disabilities may approach your organisation for advice on a range of issues; both related to and separate from their physical or mental wellbeing. This resource focuses on Employment and Support Allowance, although the process outlined below might be equally applicable to clients interacting with any public service or employer.

To improve your understanding of the types of issue that your ESA clients may face regarding reasonable adjustments, have a look at the Citizens Advice client stories below:

Client A suffers from chronic spinal degeneration, arthritis throughout her joints, depression, anxiety and agoraphobia. Client A's GP wrote to ATOS to say that she would benefit from a home Work Capability Assessment (WCA) for ESA due to mobility issues. ATOS failed to make this reasonable adjustment and sent the client with her support worker to a Medical Centre where she would have to climb stairs.

Client B is deaf in one ear and has great difficulty reading and writing. He attended his WCA on 19 February. He said when he was interviewed he was being criticised because the information on the forms which he had filled in was incorrect. He explained it was not him who had filled in the forms. He was told he was shouting - but he said he explained that he is deaf, and that makes him talk loudly - he said he was not shouting. After less than five minutes, he was told the interviewer was ending the interview. He was told to go out and stand outside. No one explained to him what was going on. He said he asked if his wife could come in to help him but was told she was not allowed in. The CAB adviser raised with client that he was perhaps the victim of discrimination, in the way ATOS had treated him, in that they failed to recognise his disability.

Client C is 50 years of age and has been diagnosed with multi focal choroidopathy which causes blindness. The ESA50 she has received through the post has lettering which is too small for her to read.

Client D was on Incapacity Benefit until the transfer to Employment Support Allowance (ESA) which she was refused. She is now on Jobseekers Allowance (JSA) which has been sanctioned because she hasn't met her jobseeking requirements. The client says that she can't look at a computer screen for as long as the Jobcentre insists she should without it bringing on a migraine.

Client E has been unemployed for 7 years. Recently he has been on a training scheme organised by the Jobcentre and has been receiving ESA. Client has dyslexia and Irfan's syndrome, which means he **needs extra help to access the training**. Client said that no effort was ever made to give him special help or make allowances for his impairments. Client therefore stopped going to the training.

Client F is profoundly deaf and **needs a signer in order to communicate**. He had a meeting at Peterborough Jobcentre re: the work programme. He was unable to understand his adviser or communicate with her. The DWP has spoken to his mother on the phone and asked her to come with him to his work programme. They have not offered to provide a signer or made other arrangements for client.

3. Creating your own action plan and engaging your staff

Use the 5 minute starter handout to introduce this guide to your staff.

Talk to your staff about:

- how a focus on reasonable adjustments might be relevant to the process of applying for ESA
- specific points in the claim process where advisers might proactively highlight the opportunity for reasonable adjustments.

Use the resources in this pack:

- at a team/ workers meeting
- to send information around by email
- to create a display on a communal noticeboard looking at:
 - how this pack can help your clients/organisation
 - disability awareness and taking action on reasonable adjustments
 - what other your organisation have done around benefits and equality issues

In your organisation, you might think about:

- The types of client/enquiry you see where a reasonable adjustment may be required from another agency.
- When and how advisers might highlight the opportunity for reasonable adjustments to all clients.
- How advisers might be proactive about possible need for reasonable adjustments.
- How advisers or social policy/ campaign staff could follow up on requests; track what was actually provided, and support clients to complain if it wasn't suitable.
- How you can adapt and use the materials in this pack.

4. Talking to clients about reasonable adjustments

Talk to your assessors and advisers about questions to help advisers know when reasonable adjustments might be helpful for any client.

Here are some suggestions for helping you to spot when you might advise and help a client with reasonable adjustments.

Alarm bells & light bulb moments

- Client is sanctioned but they couldn't attend a group training session/ Job Centre Plus (JCP) interview or meeting because of their mental health issues.
- Assessment centre has no lift / is not accessible by public transport / has one disabled parking space which is used by staff.
- DWP is enforcing a sanction but a dyslexic client is struggling to understand the correspondence about it.

Trigger statements by clients

- They said I had to use the telephone; come into the office; complete the form ... and that was the only way it could be done.
- I asked for specific arrangements but none were made.
- I couldn't get in ... OR I used to be able to get in, but they installed X and now I can't.
- They said my wheelchair was a health and safety hazard.

You are trying to find out:

- Does your client have a disability in the way it's defined by the Equality Act?
- Has your client been disadvantaged by the way something is done, even it is done the same way for everyone?
- Is their ability to access ESA reliant on gaining reasonable adjustments to allow them to engage in the process?
- Are they subject to mandatory reconsideration?
- Have they been found fit for work and at risk of sanction without reasonable adjustments?

Questions to ask

- Is your health condition long term 12 months or more?
- Are you disadvantaged by this (policy, rule etc) because of any health condition you have?
- How have you been disadvantaged by requirements of the ESA process?
- What change/s to ESA processes would mean you are not disadvantaged?

5. Suggested adjustments

This list gives some suggestions for possible adjustments that might be reasonable. Remember – what might stop disadvantage for one client won't always help another client. What might be reasonable once might not be reasonable in another circumstance – one size won't fit all!

Applications

If an ill or disabled client wants to apply for ESA they may need the application materials provided in a specific format in order to be able to use them effectively. Reasonable adjustments that you can ask for might include:

- Help with completing forms
- Forms in large print or braille, or to be completed over the phone

Communication with the claimant

When DWP are communicating with the claimant, whether about the ESA application process or to instigate a sanction, this should take place in a manner which is both physically accessible and clear/comprehensible to them. Reasonable adjustments that you can ask for might include:

- phone calls rather than letters
- the provision of EasyRead information or large print
- text relay, textphones or video relay services
- information in British Sign Language.

Work Capability Assessment

An ESA claimant should be asked if they would prefer to be assessed at home, and if they are to be assessed at a centre, should be provided with reasonable adjustments to ensure they can reach and access this centre. You could support the client to determine where their assessment might take place using the Atos tool, and use the information provided to determine if any support or adjustments will be required to allow them to participate. Reasonable adjustments that you can ask for might include:

- assessment on documentary evidence
- assessment at home or in a building less than a certain distance from the clients home
- level or step-free access
- an interpreter or BSL signer.

Found fit for work

If a claimant is found fit for work and is taken through Mandatory Reconsideration they will be advised to apply for JSA. They might ask for a number of adjustments to the physical environment of the work focused interview and the commitments made in their claimant commitment (see below) to ensure that they are not unnecessarily sanctioned. Possible adjustments could include:

- referral to a disability employment adviser
- referring to the <u>Access to Work programme</u>⁹
- not referring the client to the Work Programme¹⁰
- altering the time or frequency of their signing on appointment

⁸ http://www.atoshealthcare.com/claimants/locations home

https://www.gov.uk/access-to-work/overview

¹⁰ https://www.gov.uk/moving-from-benefits-to-work/job-search-programmes

Jobseekers agreement or claimant commitment

During Mandatory Reconsideration or following a 'fit for work' finding, claimants are likely to move onto JSA and be subject to a 'jobseekers agreement' or 'claimant commitment'. You might ask for reasonable adjustments including:

- Not sanctioning the client for breaches of their jobseekers agreement arising from symptoms of their disability.
- An 'amended' claimant commitment/jobsearch requirements based on the client's abilities to look for work.
- Changing the type or location of work the claimant is required to consider.

At the tribunal

If the claimant goes to appeal and has to appear at the tribunal they may require adjustments to ensure they can participate. Reasonable adjustments that you can ask for might include:

- someone to support the claimant at the tribunal
- claimant to appear at the tribunal by video
- disabled parking in close proximity to the tribunal venue.

Employers

You might also offer to support the client in requesting reasonable adjustments from prospective employers in the future. Possible adjustments in a working environment might include:

- provision of transport to and from the client's workplace
- software to support speech-to-text conversion
- regular line-management support
- provision of instructions in simple language or a written format to aid comprehension.

6. Making a request for a reasonable adjustment

Advisers can support clients to request these adjustments by letter or over the phone, and to explain the reasons for requesting them. Adjustments may be requested in anticipation (i.e. a deaf client may request a BSL interpreter as standard when planning to interact with services) or following an unsatisfactory experience (i.e. where a claimant with a learning difficulty requests future information in a simplified format after receiving information they could not understand).

Ensure you record the request for adjustments, the date it was made, the element of the ESA process it pertained to and the response received from DWP/Atos. This will allow you to support the client to complain if requested adjustments are not made.

Example: The first action a client may take after receiving advice might be to add a line or paragraph mentioning the Equality Act to a complaint letter asking for a reasonable adjustment and to stop the discrimination.

"I am applying for ESA. But your policy of sending me information about my application in hard copy printed text only is causing me a substantial disadvantage. I have very poor eyesight and so cannot read this information. I have asked you before to provide the information in Braille or electronically so I can access it. This is disability discrimination in breach of the Equality Act 2010. Please confirm the steps that you are taking to ensure that I, and others with similar requirements, can access and read it"

The ESA50 has a section which specifically asks claimants about their access needs. This is the first place in which clients may be able to record details of their needs and the reasonable adjustments required.

Bear in mind that Atos have previously stated that the ESA50 is not viewed in detail by the administrative staff, save to link it to the appropriate file on receipt of the completed questionnaire. It is therefore helpful to follow up any written request and to telephone Atos to ensure reasonable adjustments have been noted by the WCA venue management and the relevant healthcare professional (assessor).

Communications regarding the WCA, ESA eligibility decision and any appeal arrangements from DWP or Atos should all offer a point of contact for further questions or reasonable adjustment requests. A template reasonable adjustment request letter is available from Citizens Advice (see page 18) to assist clients with this process.

7. Following up if a reasonable adjustment is not made

It is important that claimants draw attention to failings in the process and to processes where they have not been offered or provided with reasonable adjustments. This helps to improve the process for others. Where the failing is around reasonable adjustments, it is important that claimants not only complain but draw attention to the fact that this is discrimination under the Equality Act 2010.

A client may achieve one or more of the following by making a complaint:

- an apology for what happened
- an explanation of how the problem occurred
- an assurance that the problem will be put right, if this is still possible
- a change in procedure
- in certain circumstances, financial compensation.

Regular liaison between advice agencies and the offices which administer social security can improve service for clients and claimants generally. This can help secure improvements and/or alert offices to problems which need to be addressed, resulting in, for example:

- a change in the guidance issued to offices
- a change in procedures
- improved waiting times for benefit claims to be processed
- improved efforts to provide a service which meets the needs of all sections of the community
- offices checking other cases to put right similar problems.

Further information on complaining about the ESA application process and the face-toface assessment are contained within the complaints resource linked to in the appendix.

8. Campaigning

There are a range of associated campaigning actions that might increase the impact of this work – for example, collating and analysing evidence, highlighting case studies to your local MP or forming a liaison group.

You can influence the implementation of the ESA claim process for other claimants by considering:

- If the barriers you have identified disadvantage other disabled people.
- If the change/s you have identified to that 'rule' or process would prevent other disabled people from being disadvantaged?

If the answer to these questions is yes, you have a good case to write to the DWP and highlight the issue and the impact it may be having on the efficacy of the ESA process and the lives of claimants. You could also:

- Write a press release on the problems you have identified and/or your successes in challenging them for a local paper. Remember to use case studies to highlight the impact of these issues.
- Tweet about the right to reasonable adjustments and your work to challenge disability discrimination using the hashtag #FitforWork or #Standupforequality and #Challengediscrimination.
- Encourage claimants who have faced discrimination while claiming ESA to share their stories on our blog. ¹¹
- Talk to local disabled people user led organisations and pressure groups about the ESA campaign and how supporting individual clients to request and challenge reasonable adjustments during the process can have a beneficial impact on the workings of similar mechanisms in the future.
- Check that client-facing resources and template materials are appropriate and make any changes required.
- You can access audit other buildings related to the ESA process in terms of accessibility and ability to accommodate reasonable adjustments.
- Establish a method for feeding back on shared issues (for example, with physical accessibility of WCA venues) to relevant stakeholders and to progress adjustments to improve the experience for all claimants.
- Embed a simple action plan into the work of advisers, campaigns staff, managers and trustees.

When launching this project, decide your action plan for advisers, campaigns workers, managers and trustees to feed information about clients asking for reasonable adjustments or complaining about disability discrimination into your head office, national partners or to other local stakeholders.

¹¹ https://blogs.citizensadvice.org.uk/blog/was-it-fit-for-work-for-you/

9. Showing how it makes a difference

When you have helped your client by:

- advising them about rights that can help solve their problems
- solving more clients problems
- getting successful and better outcomes
- making a bigger impact
- doing campaign work that leads to bigger changes

it's important to be able to keep track of what you have done so you can show the value of your work, and collect evidence that will help us support your work and campaign for more improvements and changes. And of course, showing the value of what you do can also help attract funding.

Record your advice. Use your usual tools to record advice provided around discrimination and reasonable adjustments. If you do not already routinely record information you should set up a system or add codes and processes to existing systems to ensure that all work around discrimination is appropriately captured and aggregated.

Remember that the legal duty to make reasonable adjustments only helps people who meet the Equality Act definition of disability. But it is important to help clients to challenge all kinds of unfairness and inequality and to collect evidence about when we see it.

Collect and share your evidence, outcomes and successes – with <u>Citizens Advice</u>, others in your organisation, disabled people's organisations in your area and your local authority or MP.

You can also encourage clients to share their own evidence by giving them a copy of the <u>ESA claimant diary</u>¹² to fill in throughout their application process. The diary includes a section for them to record any reasonable adjustments they have requested and the response received.

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¹² http://www.adviceguide.org.uk/wales/esa_diary_complete_by_hand.pdf

10. Engaging with local disabled people's user- led organisations (DPULO)

Why do it? There are some very good reasons for working with local DPULO:

- It is very important not to make assumptions about what disabled people need,
- Engagement and joint work can help you understand how your clients are disadvantaged, and get better outcomes for them
- There is no one size fits all we all have different abilities and needs

What could you do?

The joint actions you decide to take will depend on the issues you identify as impacting on clients in your area and any other local issues that arise – for example a WCA venue which is not fit for purpose or a local employer who has hit the headlines for disability discrimination. You could:

- carry out an access audit of public venues, space and services, offering a 'quality mark' for the most accessible
- meet with the Jobcentre to highlight cases from your client base and the DPULO and develop joint solutions
- write a joint report on issues identified around ESA and reasonable adjustments
- ask your local authority to run a discrimination project aimed at highlighting the right to reasonable adjustments and the responsibility for services and employers to provide them
- highlight government services which are not providing an accessible service and suggest improvements
- run a joint event to discuss disability issues, highlight discrimination and engage people in the ESA campaign
- launch a local campaign to improve other support services or processes which regularly affect your clients
- work with the DPULO to engage their users in the ESA campaign by sharing their stories.

How can you find them? The British Coalition of Organisations of Disabled People (BCODP) is an umbrella organisation of those where it is the disabled people themselves who are in control of or have a major input in the running of the organisation. Their directory of member organisations is a good place to find alternatives to the major charities and organisations for disabled people. Go to their website www.bcodp.org.uk for details.

11. **Further help**

The resources below have been developed by a range of organisations, including Citizens Advice, for use in health services and the workplace. They are all practical, offering useful information and suggestions about reasonable adjustments. They are well worth reading to for ideas and to see how this duty can be used in other areas. 13

- What can your organisation do to help clients with discrimination issues? A legal briefing from Mind¹⁴.
- Legal Aid: It is possible to get legal aid 15 for help with discrimination issues. even in welfare benefits.
- Practical tip: If your client is experiencing harassment related to disability it may also be hate crime or a hate incident, which should be reported to the police for the client's own safety, and/or reported as a hate crime or incident. For more information see the <u>report-it</u>¹⁶ site or visit <u>Disability Rights UK</u>¹⁷
- **Ipswich CAB** has an innovative new project to support people asking for reasonable adjustments before signing a Jobseekers Agreement, with a very useful client leaflet¹⁸.
- Sheffield Advice has developed a great self-help pack¹⁹ about asking for reasonable adjustments from any service provider.
- Reasonable Adjustments for People with Learning Disabilities²⁰ an Easy Read guide produced by Improving Health and Lives
- The Migraine Trust has an Employment Advocacy Toolkit²¹ which provides information about migraine in the workplace and tools and guidance to help migraine sufferers if difficulties arise at work, including asking for reasonable
- This TUC quide²² to autism aims to inform trade union officers, representatives and members of the facts about autism, and advise how to support members who are autistic to secure the adjustments they may need.
- Manchester CAB has produced a great myth busting resource called 'Well Actually²³ that has lots of eye opening equality facts.

¹³ Note that the duty to make reasonable adjustments in the workplace works slightly differently to the duty of a public service provider, but resources on this are still very useful for ideas about the kind of adjustments that are useful to remove disadvantage, and what might be reasonable.

http://www.mind.org.uk/information-support/legal-rights/disability-discrimination/
https://www.gov.uk/civil-legal-advice
http://www.report-it.org.uk/home

http://www.disabilityrightsuk.org/how-we-can-help/independent-living/stop-disability-hate-crime

http://www.ipswichcab.org/wp-content/uploads/2012/12/3D-Project-Ips-CAB-and-ISCRE-TDE.pdf

¹⁹http://www.advicesheffield.org.uk/images/directory/Documents/Factsheets/Discrimination_Factsheets/discriminati on_complaints.pdf on_thip://www.cnwl.nhs.uk/wp-content/uploads/2012/04/Reasonable-adjustments.pdf

²¹ http://www.migrainetrust.org/employment-advocacy

²² http://www.tuc.org.uk/sites/default/files/Autism.pdf

²³ https://beta.citizensadvice.org.uk/cablink/Equality/Bureaux-equality-showcase/

12. Your organisation and reasonable adjustments

This pack is about asking for reasonable adjustments for clients from public bodies such as the DWP or Jobcentre Plus.

When we start to look at reasonable adjustments that other organisations can make for our clients, we often reflect on how we provide our own services and whether we can and should be making more reasonable adjustments ourselves.

You could carry out an audit of your premises to ensure that they are accessible (and remember that this doesn't just mean having a wheelchair ramp), and then identify any improvements you need to make. You might even want to speak to clients with a disability or long term illness about their experiences of using the CAB to find out how satisfied they are with your ability to adjust the service you provide so that they can access it.

If you identify any problems and make changes based on this work, use your experiences to demonstrate to other local services how they can change – and highlight any issues raised to your regional DWP or Atos contacts to encourage better practice.

13. Resources and templates

You can follow the links below to directly download resources to support your work on discrimination. For further resources around ESA and our campaign to make ESA fit for work, visit our campaign pages.

- A. 5 minute starter²⁴
- B. Worker's meeting social model of disability hand-out²⁵
- C. Worker's meeting Equality Act and disability hand-out²⁶
- D. <u>Adviser checklist: Mandatory Reconsideration, sanctions and disabled</u> people²⁷
- E. Template letter requesting reasonable adjustment²⁸
- F. Example letter requesting reasonable adjustment²⁹
- G. Example letter following up where no adjustment made 30
- H. ESA and reasonable adjustments flowchart³¹
- I. Worker's meeting Powerpoint presentation³²
- J. Complaining and campaigning³³

Produced as part of the ESA Fit for Work campaign

17

http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handouta_ext.pdf http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handoutb_ext.pdf

http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handoutc_ext.pdf http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handoutd_ext.pdf

²⁸ http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handoute_ext.pdf

²⁹ http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handoutf_ext.pdf ohttp://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handoutg_ext.pdf

³¹ http://www.citizensadvice.org.uk/ffw_esa_and_reasonable_adjustments_resource_handouth_ext.pdf 32 http://www.citizensadvice.org.uk/ffw_-

__reasonable_adjustments_and_esa_workers_meeting_short_presentation_resourcei_ext.pptx 33 http://www.citizensadvice.org.uk/ffw_esa_complaints_resource__ra_handoutj__ext.pdf