

REASONABLE ACCOMMODATIONS for People With Disabilities IN THE WORKPLACE



**NATIONAL CENTRE FOR
PROMOTION OF EMPLOYMENT
FOR DISABLED PEOPLE**

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INTRODUCTION

The Rights of Persons with Disabilities (RPWD) Act 2016 requires employers to provide reasonable accommodation to people with disabilities. This law states that denying reasonable accommodation to a person with disability would be considered as discrimination and hence, liable to legal action.

Based on the queries received from employers regarding the kind of accommodations that may be required for people with different disabilities in the workplace, NCPEDP with support from Mphasis F1 Foundation decided to bring out this publication on Reasonable Accommodations for People with Disabilities in the Workplace in collaboration with DEOC.

This document is structured as follows. The first chapter, which is in an FAQ format for easy reading and comprehension, provides a thorough understanding of reasonable accommodations and the system that needs to be put in place for providing accommodations to people with disabilities. The second chapter lists the various possible accommodations that may be required in the workplace for people with different types of disabilities.

The list of possible accommodations is based on several years of NCPEDP and DEOC's experience and expertise in assessing, suggesting and facilitating the implementation of accommodations for people with disabilities in workplaces. Consultation with people with disabilities was also undertaken to gather their views and suggestions. The list of accommodations / adjustments that have been provided in the document is indicative and not exhaustive.

CHAPTER 1

UNDERSTANDING REASONABLE ACCOMMODATION

1. What is reasonable accommodation in the workplace?

People with disabilities may face certain functional difficulties and barriers (physical, digital, information, administrative, attitudinal, social etc.) in a workspace due to which, they may either not be able to apply/compete for a job or may not be able to participate/contribute/grow as an employee in an efficient manner. Hence, accommodation/adjustments may be required to address these barriers and to create a level playing field for persons with disabilities in the workplace.

Some examples of reasonable accommodation at a workplace are given below.

1. Providing a screen reading software for a person with visual disability.
2. Changing the work timing from 10 am – 6 pm to 7 am – 3 pm for a person with psycho-social disability who feels fatigued in the late afternoon/evening hours.
3. Modifying the height of the worktable and/or chair for a person who is short-statured.
4. Restructuring the job description for a person with hearing disability by increasing the number of chat/email-based enquiries and removing call based enquiries. This restructuring could be accomplished by allotting the call based enquiries to a colleague without a hearing disability and consequently transferring the chat/email enquiries to the employee with hearing disability.
5. Setting up a task-based interview for hiring a person with Autism.

2. Is Reasonable Accommodation different from Accessibility?

If yes, how?

The term 'Accessibility' refers to making buildings, software and products and services compliant based on certain national/international standards.

For example,

1. Constructing a ramp with appropriate gradient, railings, surface, landing, width etc. as per standards is accessibility.
2. Adding captions to a film is accessibility

Accommodation, on the other hand, focusses on addressing specific individual needs of a person with disability. It is not just restricted to providing accessible goods, technology and services. It could be related to working conditions, timings, job restructuring, leave, training/supervising methods, accessing benefits and many other aspects.

Please note that accessibility is generic and accommodation is individualised and specific. For some people, accessibility may be enough but for some others, both accessibility and reasonable accommodation would be required to ensure access.

In some places where accessibility is an issue, reasonable accommodation could be used to address the specific barrier. If an online training module happens to be inaccessible to a person using a screen reader, then, providing a reader could be a short-term solution to address the issue as a reasonable accommodation.

3. What is Universal Design?

Universal design is a broader term coined by architect Ronald Mace to describe the concept of designing an environment or a product to be usable to the greatest extent possible by everyone regardless of their age, ability, or status in life. It also extends to policies and processes as well. Universal design takes into account the needs of the maximal set of users including people with disabilities right from the planning and design stage with equality of access as the key goal.

For example,

1. Having no time limit as an exam policy would be an example of a policy which has been designed based on universal design principles. However, providing extra time to people with disabilities is an accommodation.
2. Allowing all employees to choose the location that they want to work from (office /home) as a policy is universal design, whereas allowing a person with disability to work from an office closer to her/ his/ their home is an accommodation.
3. Automatic doors, spacious aisles, good lighting, good acoustics, adjustable height furniture, well organised places are all examples of universal design in a built environment. Buying an adjustable height table and chair for an individual is an accommodation.
4. Having an inbuilt screen reading software in an operating system of computers is an example of universal design. Installing screen reading software for persons with visual disability in their computers is an accommodation.
5. Installing a navigation software which has an audio feature (which can also be switched off when not required) in different languages is an example of universal design. Providing a tactile map in hand for people with vision disability is an accommodation.

4. If a space, product, service, or technology is accessible, would an accommodation be then required for people with disabilities?

If a space, technology, product or a service is designed based on accessibility standards, then, for most people with disabilities, accommodations are not required. However, there could still be a few individuals with disabilities who may need certain accommodations.

For example, an All Gender Accessible Washroom designed based on universal design principles is accessible for a maximal set of people including people with disabilities. However, an individual with a specific disability may need an attachment to make the height of the WC higher which should be provided by the employer as an accommodation.

5. Do all people with the same disability need the same kind of accommodations?

No. One should not assume that. There is always a range of functioning within a disability category. Further, there is the important element of personal preference/ choice/training. Hence, it is important to ask the person about her/his/their accommodation needs first.

6. Does the law mandate that reasonable accommodation should be provided to people with disabilities?

Yes. The Rights of Persons with Disabilities Act, 2016 mandates non-discrimination on the grounds of disability. It requires the establishments to provide reasonable accommodation. As per the Act, denying reasonable accommodation can be considered as discrimination and hence, liable to legal action.

7. Do employers have to provide reasonable accommodation only to people with the 21 impairment categories listed in the Act?

Employers will have to provide reasonable accommodations to all people with disabilities and not just for those people whose impairment is listed in the Schedule of the Act/ people with benchmark disabilities. The Act states all persons with disability, i.e any person who has a long term impairment and who faces barriers, should be provided reasonable accommodation.

For example, a person with kidney failure may need to undergo dialysis for which she/he/they may need time off on a regular basis. Similarly, a person with colour blindness may face barriers in work if she/he/they are given a list of items in red and green colours, indicating priority. These people are covered by the law and can seek reasonable accommodation, though these conditions (i.e the kidney failure or colour blindness) are not listed as specified disabilities in the Schedule of the Act.

Also, it may be useful to mention here that some corporates have broadened the scope for providing reasonable accommodation to include employees who are caregivers and those with temporary impairments as well. This is a good practice.

8. In which areas do people with disabilities need reasonable accommodation in the workplace?

People with disabilities may need accommodations 1] for applying/interviewing for a job or 2] after joining the job in order to work, participate, avail benefits and grow on an equal basis with others.

1] Prior to Joining: This is for candidates applying for a job and for them to participate in the selection process.

For example, one should provide:

1. An accessible venue for a person with locomotor disability.
2. An accessible assessment for a person with vision disability.
3. A sign language interpreter for a deaf person to participate in an interview.
4. Modified selection procedure for a person with learning disability.

2] Post Joining: This is for employees at any time during the course of employment for carrying out the day to day demands of the job, accessing benefits, training, participating in team engagements and leveraging growth opportunities.

For example, one should provide:

1. A larger monitor for a person with low vision.
2. A light touch ergonomic keyboard for a person with repetitive stress injury.
3. Assistance in getting food and coffee from the cafeteria/pantry for a person with mobility disability.

4. A reserved parking space closer to the lift for a person with thalassemia who feels fatigue.
5. A sign language interpreter at a training session for a deaf person.
6. Headphones for noise cancellation for a person with autism.
7. Choosing an accessible restaurant for team dinner in order to make it inclusive for a team member using a wheelchair.
8. Extra paid leave for a person who acquires disability.

9. Can one ask candidates with disabilities if they need reasonable accommodation at the interview stage?

The discussion regarding reasonable accommodation should be done only after the job offer is made. However, if the candidate mentions her/his/their accommodation needs, you could discuss this further with her/him/them.

Please mention in all your recruitment related communication that you are an equal opportunity employer and that reasonable accommodation will be provided.

If your company has an affirmative action programme (like job reservation or a recruitment drive exclusively for persons with disabilities), then one can state that clearly and ask candidates to self-identify as persons with disability. The information should remain only with the Diversity Team which is implementing the affirmative action programme. Also, ensure that the reason for rejection of any candidate is not disability.

10. A recruiter has received the resume of a woman with Muscular Dystrophy. Where can one get information regarding the accommodations that should be provided to her?

As a recruiter, it is not necessary or even relevant to know the diagnosis of the person. Each person is different and since the impact of the impairment on the person may vary considerably, her/his/their level of independence may consequently be significantly different from that inferred from the medical definition. The only way you can get information about the reasonable accommodation that is needed is by asking the person directly. Since the candidate has mentioned that she has Muscular Dystrophy, you could ask if she needs any reasonable accommodation for attending the interview or for working.

11. If diagnosis is not important, then what are the factors for determining the reasonable accommodation?

The factors useful for determining accommodations are 1) Functional difficulties the person is facing due to the impairment, 2) Job related tasks that are difficult to perform and 3) Accommodation requested by the person.

For example,

Impairment: 'Parkinson's Disease'

Functional Difficulty: Difficulty in using hands due to tremors.

Job related tasks that are difficult to perform: Typing using a keyboard.

Accommodation Request: Speech to text software

12. Is providing health /medical insurance a reasonable accommodation?

If all employees are being provided insurance, then it should be provided to people with disabilities as well. If it is not, then it would be disability-based discrimination.

Companies that are buying insurance policies for employees should ensure that their policy covers all pre-existing conditions. However, if there are any exclusions in an already existing policy, then as a reasonable accommodation, the company can cover the hospitalization expenses for people with disabilities who are not covered under the policy.

Another aspect is the periodic health check-ups for employees. Sometimes employees with disabilities have difficulty accessing health centres. For example, a person with a disability may not be able to give her/his/their urine sample due to inaccessible toilets or may not be able to get the x-ray done as there is a huge step to climb when getting onto the x-ray table, etc. Reasonable accommodations may therefore be required for employees to access the benefits of a health check-up. Also, providing flexibility in the kind of tests that they can opt for will also help.

13. What steps should an employer take for ensuring that reasonable accommodation is provided to employees in a timely manner?

Employers should do the following to ensure that people with disabilities are able to get the accommodation required seamlessly and in a timely manner:

1. Prepare an Equal Opportunity Policy as per the law, where the commitment to provide reasonable accommodation is clearly stated.
2. Establish a process/system for candidates and employees to seek and get the needed accommodation. State the responsibilities of the concerned stakeholders and provide timeline for them to act/respond.
3. Communicate with candidates and employees regarding the policy and the process.
4. Take feedback from persons with disabilities and further finetune the process.

14. Can you explain the process flow for addressing a reasonable accommodation request?

The law does not have detailed out the steps. However, based on our experience, the steps to be taken for seeking and providing reasonable accommodation are:

Step 1: Employee Requesting the Accommodation

The person with disability shares her/his/ their accommodation request by sending an email or verbally intimating the concerned official or by filling the Reasonable Accommodation form (this can be done during the interview or at the time of joining or at any time during the course of employment).

Step 2: Processing the Request

The Liaison Officer has a discussion with the employee to get any clarifications/ documentation that may be required.

Step 3: Providing the Accommodation

If it is a request for an assistive technology or any regular accommodation requests which are within the Liaison Officer's capacity to decide, she/ he/they will process it and provide the accommodation immediately.

OR

If the accommodation request requires the involvement of different stakeholders, for example, if the request is for a shift change, then the Liaison Officer will contact the individual's manager to understand if that can be done and if there are any issues/concerns from the business point of view.

OR

If the accommodation request is unclear or the candidate or employee is not sure about what accommodation is needed, then the Liaison Officer, after speaking to the employee, could consult with a disability/rehabilitation (subject matter) expert for getting appropriate advice and to work out the specific accommodation required with the concerned employee.

Step 4: Rejecting the Accommodation request

If the Liaison Officer feels that the accommodation request is unreasonable, then the matter should be escalated to a higher-level committee, that should include a subject matter expert amongst its members, to take the final decision. At this stage all possible alternatives should be discussed. If the committee finds the request to be unreasonable, after all considerations, then the decision should be conveyed to the person with disability giving the reasons behind the rejection of the accommodation.

15. Who is the Liaison Officer referred to in the previous question?

The Rules of The Rights of Persons with Disabilities Act, 2016 requires companies that employ more than 20 employees should appoint a Liaison Officer to look after the recruitment of persons with disabilities and the provision of facilities and amenities for such employees.

16. What are the rights and responsibilities of an employee with disability with regard to seeking reasonable accommodation?

Rights

An employee with a disability has the right to:

1. request an accommodation at any time, even if her/his/their medical condition has not changed.
2. have her/his/their medical information kept confidential (if other stakeholders are to be involved in providing the accommodation, then the information regarding the person's disability may have to be shared with those specific people on a need to know basis).
3. refuse an accommodation if the employee can perform the job in a reasonable manner without the accommodation.
4. complain if the reasonable accommodation request has been refused or delayed or if there is any other issue, to the internal grievance redressal committee within the organisation. If not satisfied with their decision, she/he/they can complain to the Disability Commissioner or file a case in Court.

Responsibilities

The responsibilities of the employee seeking accommodation are given below.

1. She/he/they must inform the employer about her/his/their disability.
2. The employee must provide medical or other information if required for supporting their accommodation request. This may be necessary to verify the existence of the disability, as well as determining the kind of accommodation required.
3. The employee should provide feedback and inform the employer in case the reasonable accommodation provided is not working out or if the manager or other employees are not cooperating or if there are any other issues.
4. An employee should cooperate and discuss the various alternatives and why a specific accommodation is important for her/his/their functioning at the workplace.

17. Who pays for the accommodations?

As per the provisions in the Rules of RPWD Act, employers should pay for the reasonable accommodation. However, if the accommodation is found to be unreasonable in terms of the cost involved, various alternatives should be discussed with the employee concerned and, if required, with the subject matter expert to see if there is any other fund available for

meeting the cost. In some cases, employees themselves may be willing to bear a part of the cost.

18. When is it unreasonable for an employer to make an accommodation?

The law states that an accommodation is reasonable as long as it does not impose a disproportionate or undue burden. Undue burden has not been defined in the law. It would vary from establishment to establishment. What is reasonable for a large company may be unreasonable for a smaller company. Some of the factors that could be considered as unreasonable are given below.

1. Accommodation that requires removing essential functions of the job. For example, a person is offered the receptionist's job and the work requires that the person reports in at 9 a.m. which is the time when visitors start coming in. Then, seeking a change in the reporting time as an accommodation may be unreasonable as the place cannot be left unattended or if there is no one else available to fill in on a daily basis.
2. Accommodations that are very expensive. For example, providing a dedicated, accessible cab on a regular basis may be considered as expensive for a small size company or when the cost of the cab is double the amount of the salary of the person. This could, however, be reasonable for a larger company where this cost is absorbed in the overall travel cost or if the company has a central budget for reasonable accommodation and the cost is being covered from that budget.
3. Accommodations that are not practical. If the job is only available during the night shift, then, seeking a day shift may not be practical and hence, may be unreasonable.

It is important to take a considered view on what is reasonable and unreasonable. The decision should be guided by a subject matter expert who understands the law and disability issues. The decision should be done in consultation with the person with disability who may suggest other options. Having a clear cut policy and allocating a central budget for accommodation would help in meeting the additional cost that may be required for supporting a person with high support needs.

19. Are employers required to provide hearing aids, artificial limbs as accommodations?

No. Items such as wheelchairs, hearing aids, artificial limbs, callipers, medicines etc. which are for personal use, are not required to be provided by employers as accommodations. However, if the wheelchair is meant to be used only within the office premises then only would the company need to procure it.

20. There has been a change in the way the organisations are working, post pandemic. Has reasonable accommodation become a norm rather than the exception?

Work from home and hybrid working¹, which were seen as an exception or as a reasonable accommodation (often considered as an "unreasonable request") has become a norm with several companies. More and more companies are adopting teleworking which has helped people with disabilities who have difficulty travelling, sitting for long hours etc. However, there have been instances where people with disabilities have felt excluded in the teleworking scenario due to several barriers that were overlooked. For example, online meetings without live captions / sign language interpreter; information inaccessibility when a screen is being shared and when the content is not read out loud; inaccessible online quizzes / games organised for the team; back-to-back meetings without any breaks; no immediate assistance available for trouble shooting; unavailability of ergonomic chairs at home; uncondusive home environment and so on.

21. What are the additional considerations for supporting people with disabilities who are working from home or hybrid working?

It is important to provide reasonable accommodation for people working from home. Some of the proactive initiatives that can be taken are:

- Ensure that the policies for working from home/ hybrid working include provisions for accessibility and reasonable accommodation. Assistive technologies / accessible furniture etc. could be provided for persons with disabilities working from home. The cost for Internet/ UPS etc. can be reimbursed. The cost of availing of personal assistance could be also provided.
- Ask persons with disabilities regarding the accommodations they may need for efficiently working from home.
- A helpline could be set up for people with disabilities to reach out for any assistance required.
- Online counselling could be provided for supporting people going through certain mental health issues.
- Use an accessible online meeting tool such as zoom/ teams /Google meet with live captions.
- Tie up with an agency that provides remote sign language interpreters for meetings/ trainings etc.
- Appoint a buddy or a point person who can be approached if and when a person with disability has a concern/issue or a particular need at a job.
- Prepare and circulate guidelines and do and don'ts for inclusive virtual interactions among all employees.
- Sensitise team members so that they can ensure accessibility during online meetings and during social media interactions.
- Provide any training to organise work in a work from home scenario for those who may need it.
- Allow time for rest in the work schedule.

22. Is there any organization that can support/ help organisations with setting up the Reasonable Accommodation process?

We at NCPEDP in collaboration with subject matter experts support organizations in framing the Equal Opportunity Policy and setting up the Reasonable Accommodation process. We also conduct/facilitate assessments to arrive at the suitable accommodation for employees who may not be aware of the various options available or are struggling at work.

¹ Hybrid working is a flexible model that allows employees to split their time between working in the office and working from home.

CHAPTER 2

REASONABLE ACCOMMODATIONS FOR PERSONS WITH DIFFERENT DISABILITIES IN THE WORKPLACE

This Section lists the possible accommodations that may be required for people with different disabilities (it is not an exhaustive list). We have also added the accessibility requirements which should be provided in general in the list.

1. Common Points for accessibility and accommodation for people with any kind of disability

Pre-Offer

1. Make the information about the job opening accessible (ensure accessible company website/forms, mailers/posts in social media, etc.). Provide information (brochures, handbook, forms etc.) in accessible formats (large print, word document, Braille etc.)
2. Ensure inclusive job descriptions (for example, using appropriate terminologies, detailing of essential and marginal functions of the job and other relevant information).
3. Give a mail id and contact number to get in touch with the recruiter for any clarifications. Answer any query related to the job and selection procedure by mail/phone/in person etc.
4. State in all recruitment related communication that the company is an equal opportunity employer, and that reasonable accommodation will be provided to people with disabilities.
5. Process the request for reasonable accommodation (like request for modification in assessment, interview procedure, relaxation in qualification, accessible venue/furniture, assistive technology, timing, need for an interpreter, live captioning etc.) in the manner stated in the previous chapter.
6. Recruiters and managers involved in conducting interviews should be sensitised regarding conscious and unconscious bias and inclusive recruitment practices.
7. Maintain confidentiality of the information related to disability.
8. Rejection should not be on the grounds of disability. Reasons for rejection should be objective and related to the skills required for the job.

Post Offer

1. Give detailed information regarding the location of the office (directions to the place/map, parking facility, drop off etc.). Appoint a person to escort the employee from the gate.
2. Implement job restructuring if required, where certain tasks can be assigned to another person in the team and some other tasks could be provided to the person with disability.
3. Check with the employees if there are any accessibility and accommodations requirement and process the request at the earliest so that the needed accommodation is available from the very first day of the job.

4. Some employees may want the information about their disability to be known to everyone and some may not want their colleagues to know about it. Respect a person's wish for privacy.
5. Provide a buddy (preferably a peer) to help the person to settle in. The buddy should introduce the employee to other colleagues and explain the various systems and culture of the place.
6. At the time of induction, inform all employees about employee resource networks, support groups and other facilities (such as helplines, WhatsApp groups, counselling etc.) that are available in the organisation.
7. The Manager could provide a platform (if the employee wants it) for the employee to share information about her/his/their disability and ways of working etc.
8. The Manager should lead by example by modelling inclusive behaviour, i.e. ensuring the employee is invited to formal/ informal gatherings, providing the accommodations required for the person to participate in the meetings/ interactions, etc.
9. Have career conversations, provide opportunities to develop, appoint a mentor and provide the opportunities to attend leadership programmes.
10. Set up an accessible grievance redressal mechanism.
11. Ensure non-discrimination in promotion and other career development opportunities. Institute programmes for supporting meritorious employees to progress in their career and to break the barriers and glass ceiling,
12. Have regular awareness programmes on disability inclusion. Involve the employee with disability in planning the programmes.
13. Prepare a personalised emergency evacuation plan for every employee who may need support during an emergency.
14. Provide buddy/ies for support during emergencies.
15. Provide training regarding safety measures regarding equipment, using the alarms and navigating the route to the safe assembly area.

2. Accessibility and accommodations for people with difficulty seeing

A person has a visual disability when the person has difficulty seeing even after correction (like surgery, spectacles, lenses etc.). Some may be able to see large font size, some may have a limited field of vision, some are able to see only in high contrast settings, some may have sensitivity to light, some may have difficulty with colour perception, some may have blurred vision, some may have double vision and some are not able to see at all.

People with difficulty seeing could have low vision or have blindness which could be congenital or caused later in life. Reasons for acquiring visual disability can be varied. It can be caused by glaucoma, macular degeneration, cataract or retinal problems. Some acid attack survivors develop low vision/blindness. Vision can also be affected due to Leprosy, Multiple Sclerosis, stroke/brain injury or other medical conditions. Some people with cerebral palsy may also have visual impairment.

Assistive devices and technologies

- Magnification software
- Screen reading software
- Handheld/ head-mounted magnifiers

- Navigation Apps
- Monoculars, binoculars, telescope
- Talking calculators
- White cane/Smart cane
- OCR Scanner
- Braille Display
- Currency identification app
- Braille Keyboard
- Speech to Text software
- Pen Friend Labelling System

Built environment

- Put up signages, visual displays, maps, etc. that have good colour contrast, tactile and audio features.
- Equip with handrails around stairs/ramps and on the walls in corridors with information in Braille.
- Install tactile, colour, audio indicators and cues in pathways, corridors, staircases, important places such as counters etc.
- Install an accessible control panel (with Braille, tactile and colour contrast) and voice announcement within lifts.
- Set up audio indication/beepers for accessing card readers and other controls.
- Put up manifestations on glass doors for better visibility.
- Ensure good and consistent lighting (without glare).
- Ensure consistency of fixtures and organise furniture/fixtures to suit a person's need and maintain them as is without frequent changes.
- Allow the employee to bring in a service animal (guide dogs for instance).
- Ensure that there be no protruding objects and obstructions in the path of travel and that there is sufficient head clearance space under staircases.
- Install sounders at emergency exits.
- Provide human assistance if required.

Information, communication and technologies

- There should be a plan to make all technologies compliant with accessibility standards (Web Content Accessibility Guidelines). In the meantime, certain accommodations could be made based on individual requirements. For example, if a training module is not accessible, a reader could be provided to ensure the person understands the training.
- Make documents accessible by using proper heading levels, alt text for images/diagrams/tables, meaningful hyperlinks, simple table structure, using numbered or bulleted lists, good color contrast, etc.
- Procure accessible technology and train all professionals involved in creating accessible software/ documents.
- Train the IT support team in installing assistive technologies and for addressing any digital accessibility issues.

Recruitment

- Provide information in accessible formats (for example, large print, Braille, accessible soft copy etc).
- Conduct assessments in accessible formats (Braille/large print question papers/ accessible soft copy; accessible web-based tests, etc)
- Provide a scribe for writing tests/filling out forms, allot extra time

- Make modifications in the content of the tests (such as removing questions which are image/diagram based).
- Ensure accessibility of online interviews (use accessible meeting platform, documents in accessible format etc.)
- Provide all information (company policies, offer letters etc.) in accessible formats.

Induction

- Set up an orientation/mobility training session in order to introduce the various places in the office and how to get there. A tactile map or written description would also help.
- Provide scribe for filling up manual forms.
- If there are sessions held on the day of joining, then the speakers should ensure that the information disseminated is made accessible. (refer to the section on training).

Travelling

- Door to door pickup and drop (if the company is providing transport facility for employees). Sensitise drivers to provide the needed assistance.
- A support staff to escort to bus stand.
- Allow an escort if required for outstation trips.
- Provide golf carts/vehicles for moving around within the campus.

Training programmes, employee engagement activities and benefits

- Ensure books, PPTs and handouts are in accessible formats.
- Create suitable tactile diagrams/ maps etc.
- Send PPTs in advance and ensure that the PPTs are read out loud during the training sessions.
- Allow the person to record during training sessions.
- Provide a person who can read out what's written on board. (particularly in sessions where numerical etc are present)
- Allow scribes for assessments, allot extra time, etc.
- Organise inclusive activities where a person with visual disability can participate (for example, dumb charades is not inclusive but providing verbal clues will make it inclusive).
- Ensure audio descriptions for images/ films /plays/social media updates.

Working efficiently and progressing in work

- Provide a reader if information has to be read from print material or scanned images.
- Make team meetings and employee engagement events accessible and inclusive (for example, use accessible platforms to have online team meetings; ensure audio descriptions for a play).
- When planning an outdoor event, take into account the needs of employees with visual disability. You could consult with the employee with disability for ideas.
- Assign a peon/housekeeping assistant who could be reached out to for simple tasks such as, for example, getting a cup of coffee, going to the canteen, reading a chit of paper or picking up objects such as a hair band and so on, based on need.

Personalized emergency preparedness plan

- Provide emergency information in accessible formats.
- Train the person with visual disability in using the various alarm systems (Manual Call Points, Emergency Door Releases, Pull cord alarms etc.).
- Provide mobility training for exiting out of the buildings and reaching the safe assembly area.

- Provide sounders on exit doors
- Provide tactile evacuation maps / description on how to reach the safe assembly area.
- Assign buddy/ies as escorts.

3. Accessibility and accommodation for people with difficulty hearing

People with difficulty hearing could be either hard of hearing or deaf. People with hearing difficulty may use different modes of communication i.e. some people may lip read and speak, some may use sign language, some may prefer written mode of communication. It is therefore important to understand a person's preferred mode of communication before interacting with them.

Mentioned below are some possible workplace accessibility and accommodations requirements for a person with difficulty hearing.

Assistive devices and technologies

- Hearing Enhancement Systems (Induction Loops /FM / Infrared Systems/ Apps) for trainings.
- Transcription Apps for meetings
- Apps that convert sign language to speech
- Alerting devices (doorbell/pagers/emergency alarm with light/vibration)
- Video Relay service (video interaction via sign language interpreter)
- Mobile Phone (for text messages)

Built environment

- Install appropriate signages (including directional and information signs).
- Provide Maps / Information Boards /Interactive Display (these can also help find information just as from an enquiry counter).
- Install induction loops at enquiry counters, training rooms, auditoriums etc.
- Ensure adequate lighting to enable lip reading/seeing captions/sign language.
- Ensure reserved seating to enable lip reading/seeing captions/sign language.
- Ensure good acoustics (less background noise) (changes such as adding heavy curtains etc. would help in reducing echo which could be done as a reasonable accommodation).
- Install visual strobes (visual alarm) at appropriate places.

Ensuring accessibility of information, communication and technologies

- Ensure closed captions and subtitles for videos/audios.
- Ensure that there is a sign language box in films (adequate size of the window).
- Ensure availability of Sign language interpretation/real-time transcription services.
- Ensure availability of different communication options, i.e. using chats/ emails/ written text.
- Have printed or written scripts of all available audio materials.
- Display information about all facilities available for people with hearing disabilities.
- Mandate the use of newly developed transparent face masks (if masks are being used).
- Install the live transcription feature in webinars/web meeting platforms.
- Wear clear mask which is transparent at the mouth portion to facilitate lip reading.

Making recruitment inclusive

- Exempt from participating in group discussion / oral tests.
- Modify assessments / weightage in marking (giving less weightage to the language score compared to other topics in aptitude test if required, assessment based on job at

hand rather than generic tests).

- Conduct the interview in an accessible way based on individual preference (chat/with the support of an interpreter/ written mode).
- Conduct online assessment in a platform that offers live captions/ have an online sign language interpreter / keep the video on, as required.

Making induction inclusive

- Train the team in communicating with the person (if the employee is a sign language user, then train the team in basic sign language. Getting the employee to teach the signs would also serve as a good ice breaker with the team).
- Provide a professional interpreter/ transcriber for the first few days on the job, as there will be quite a bit of information exchange.

Accommodations for Travelling

- Make travel helplines accessible by adding facilities for texting and video chatting.
- Enable the transport app with the provision to mention that they are deaf/prefer text messages so that drivers do not call but text.
- Provide a sign language interpreter if one is travelling on work for attending meetings etc.
- Sensitise drivers/ helpdesk employees to use sms /whatsapp to communicate.

Accommodations for Training programs and employee engagement activities

- Provide sign language interpretation / real time transcription for classroom and online trainings.
- Ensure participation in training/ discussions, such as preferred seating, one person speaking at a time, etc.
- Ensure one to one training /on the job training.
- Allot more time for training and provide additional training if required (for example, in communication management, in email etiquette, in English language skills
- Provide as much content visually (Manuals, PowerPoint with explanations in notes, diagrams/flow chart, etc.).
- Recording of training sessions for repetitive viewing, provide transcripts of the recordings.
- Training Manual / PPTs to be handed prior to the training session for better grasping.
- Appoint a buddy Trainer for a few weeks during on-job training, which helps in building confidence and accuracy.
- Organize the training in a room equipped with induction loop or provide assistive technology like an FM system. Trainer should use a microphone.
- Allot preferred seat (such as front middle seat, circular seating arrangements etc.).
- Plan events where deaf/hard of hearing employees can participate.
- Appoint buddies to ensure that verbal information/announcements reach the deaf/hard of hearing trainees/employees.
- Provide important instructions in written form.

Accommodations for Working efficiently and progressing in work

- Provide job restructuring, if required, within the team.
- Sensitise/train team members to include the deaf /hard of hearing employees.
- Provide note taker to the employee for meetings/conference calls.
- Give a missed call/text message to employee's mobile to catch their attention as calling out won't work.

- Counselling services, if being provided, should have options for chat and video with sign language apart from being call based.
- Ensure online meetings have live captions, switch on the video if the person would like to lip read.

Developing a personalized emergency preparedness plan

- Add visual strobes at workstations (on the wall as well on the bay/cubicle where the person can see) and at other places such as meeting rooms, food courts, washrooms, etc, which the employee visits regularly.
- Set an alarm on mobiles/watch/laptop.
- Organise individualised training sessions regarding emergency procedures in a manner that is accessible for the person (ensure the presence of a sign language interpreter, live transcription, etc.).
- Training videos on emergency preparedness should have captions and sign language.
- Install appropriate signage for exits and other information (such as contact numbers and so on).
- Appoint buddies to inform in case of verbal announcements and if the person is not in her/his/their work desk.

4. Accessibility and Accommodation for People with Deaf blindness (having a combination of hearing and seeing difficulty)

Deafblind persons may have total deafness/total blindness/low vision/hard of hearing or any combination of these four aspects. For mobility, some use red & white canes, some use service dogs and some do not need any assistive technology. Some people can speak, some may be non-verbal and so would use tactile sign language or a transcriber/interpreter for communication.

Mentioned below are some possible workplace accessibility and accommodations requirements needed by a person with deaf- blindness.

Providing the needed assistive devices and technologies

- Refreshable Braille Display
- Screen reader
- Vibrating Devices (door bells, emergency alarms)
- Hearing enhancements (amplifiers, FM receiver etc.)
- Communication books/cards
- Video /text chatting services
- Electronic magnifiers/Magnification software/ desktop video magnifier
- Optical Character Recognition (OCR)
- Tactile and large print keyboard
- Braille note taker/ calculator/ watch
- Communication and navigation software /Communication app using Morse Code
- Mobile devices software such as Braille back and Talk back
- Cane/ smart cane with red & white strips to indicate deaf-blindness
- Smart Glasses
- Braille embosser
- Smart shoes with sensors

Providing accessibility in the built environment

- Refer to the points listed for people with difficulty seeing and people with difficulty hearing.
- Install tactile clues, object clues, braille marking, tactile guiding blocks, raised letters, Braille/tactile maps, tactile dots on equipment, high colour contrast, appropriate lighting in the room etc. as they are particularly helpful in moving around.

Ensuring accessibility of information, communication and technologies

- Refer to the points listed for people with difficulty seeing and hearing.
- Providing information in preferred format; provision of tactile sign language interpreters, transcripts for films/ speeches, sharing information using WhatsApp/text, will help.

Making recruitment inclusive

- Modify the interview procedure based on the person's preferred mode of communication (verbal/ written mode / with a tactile sign language interpreter).
- Administer assessments in accessible formats (Braille/large print/ computer based - accessible software and assistive technology) and allot extra time for the test.
- Carry out assessments using observational methods, if required.
- Ensure that coordination for interviews, joining etc. is done via text/WhatsApp.
- Provide relevant information (brochure, job description, etc.) in accessible formats (accessible soft copy/Braille/ large print etc.).

Making induction inclusive

- Provide orientation and mobility training within the office to know various places and how to get there (tactile map will also help).
- Provide an interpreter/support person during the initial days at the job (based on need) for helping the person settle down and for completing any training etc. that may be required.
- Sensitise/train the team in communicating with the person with deaf-blindness.

Accommodations for Travelling

- Provide an escort/ guide/interpreter based on need.
- Travel helplines should communicate based on the person's preference.
- Sensitise drivers and the employees manning the help desk.
- Some people carry communication cards (with comments and directions) if they are travelling independently. Provide a travel route map so that they can anticipate and reach to the destination on their own.
- Provide an emergency number to which text messages can be sent in case they need any help.
- Provide necessary communication devices such as a mobile phone with refreshable Braille etc. as this will help them to be in constant touch with the office/supervisor.

Accommodations for Training programmes and employee engagement activities

- Provide preferred seating.
- Appoint a tactile sign language interpreter/transcriber.
- Modify training methodologies and assessments based on individual needs (for example ensure one on one training, on job training, extended training time, etc.).
- Provide the content in an accessible format (large print/Braille/accessible soft copy etc.).

- Modify the curriculum and training content to suit the individual's needs.
- Ensure captions/audio descriptions/Braille transcripts for videos.

Accommodations for Working efficiently and progressing in work

- Arrange the workstation/ area based on individual needs.
- Remove clutter/protruding items if any from the work area.
- Provide orientation and mobility training both within and outside the office premises.
- Provide a buddy who knows how to communicate with the person.
- Provide information via suitable communication channels as this is the key to productive work. To this end, establish the preferred mode of communication and ensure everyone knows and follows it strictly.
- Interpreters/transcribers should be provided in order to interpret in real time for structured and unstructured meetings.
- Ensure accessible documents and mailers.
- Allow the person to bring service animals to the workplace.
- Ensure accessible online meeting through live transcriptions which can be read using Braille display.

Developing a personalized emergency preparedness plan

- Train the employee in using the emergency alarms, in navigating the route to safe assembly area and in the evacuation procedures.
- Give information about emergency equipment and orient the person with regard to hazards and other obstacles.
- Ensure the availability of a tactile map of the building/workstation along with tactile emergency evacuation plans.
- Install vibrating alarms/audio and visual indicators.
- Install tactile indicators on railings, staircases and pathways.
- Provide buddies and train them to escort a person with deaf-blindness.

5. Accessibility and Accommodation for people with difficulty moving around

Some people may have difficulty moving around. They may have difficulty standing/walking/ climbing. Some may use assistive aids for moving around such as a stick, wheelchair, tricycle, walking frame, crutches, etc. The movement disability can be caused due to many factors including polio, amputation, cerebral palsy, muscular dystrophy, spinal cord injury, multiple sclerosis, blood disorders, spinal injury, backache, fibromyalgia and any other ailment or condition that restricts the movements of a person. People who are short statured (Dwarfism) may also have certain issues with infrastructure such as the height of controls, high steps, high door handles, high furniture, high information boards etc. which may restrict their movement/functioning.

Mentioned below are some possible workplace accessibility and accommodation requirements needed by a person with difficulty moving around

Providing the needed assistive devices and technologies

- Mobility devices, such as wheelchairs, crutches, artificial limbs, callipers, sticks, etc.² used in office premises.

Providing accessibility in the built environment

- Ramps
- Lifts

- Accessible doors
- Reserved Parking
- Handrails on steps/ramps
- Accessible toilets/washrooms
- Accessible counters and controls
- Accessible microwave, coffee machines, glasses/cups, sink etc.
- Accessible furniture
- Accessible gates, pathways, corridors, wide aisles for manoeuvrability of wheelchair, uncluttered place
- Adjusting the height of signages and information boards
- Resting rooms
- Automation (for controlling lighting level, adjusting temperature in rooms, operating appliances/switches, etc)
- Availability of wheelchairs
- Availability of evacuation chair

These features must adhere to accessibility standards.

Ensuring accessibility of information and communication technologies

- If there are kiosks, vending machines, displays, etc. there should be adequate space available in the front (along with knee and toe space to enable forward reach). The height of the controls should also be accessible. The information should be within the vision zone as per standards.

Making recruitment inclusive

- Have an accessible venue for the interview.
- Remote interviews through video conference.
- Provide accessible tables/chairs for writing tests.
- Provide information to candidates regarding availability of accessible washrooms, ramps, lifts, parking spaces etc.
- Ensure availability of a wheelchair. Provide assistance if required.
- Give priority in interview so that the waiting time is not long.

Making induction inclusive

- Provide information about available facilities, including accessible reserved parking, washrooms, resting rooms, etc.
- Assign a housekeeping person/peon/assistant for helping with certain necessary things such as getting coffee or lunch, boarding the car/bus and other daily activities.

Other accommodations for Travelling

- If transport is being provided for employees, then it should be ensured that it is accessible for people with disabilities i.e. make sure that the vehicles used have a low floor (buses, cars, golf carts etc.), hire cabs with larger boot space, procure wheelchair accessible vehicles with hydraulic lifts/ramps, provide door drop/pick up if needed, etc. If the person has her/his/their own vehicle, they can be compensated for the costs or given a travel allowance.

² Please note that assistive technology for personal use need not be provided to an employee as part of reasonable accommodation. However, if it is required for use only in office, it should be provided. For example, some people may not have or may use a wheelchair only at home but may prefer using a wheelchair in the office. In that case, a wheelchair should be provided as reasonable accommodation, which will then be kept in office premises

- For outstation travel, allow an escort to travel along if required or provide an extra daily allowance for hiring a caregiver.
- Ensure an accessible mode of travel and hotel stay for outstation travel.

Other accommodations for Training programmes and employee engagement activities

- Accessible venue
- Accessible seating
- Accessible stage/podium
- Inclusive activities (outdoor activities should consider a person's accessibility needs).

Other accommodations for Working efficiently and progressing in work

- Allow working from a convenient location/work from home.
- Allow breaks for posture change, taking medicines, etc.
- Allow the person to have food at the workstation area.
- Allow participation through teleconferences.
- Allot extra medical leave/time off for therapy, surgery, rehabilitation etc.
- Provide home modification costs in case of transfer to another city, apart from other relocating costs.
- If the company provides a car as a benefit, then allow for an additional allowance for modifying the car to make it accessible.
- Provide human assistance for supporting the person in certain daily living activities / allow the person to bring their own personal assistant.

Developing a personalized emergency preparedness plan

- Consult with the employee regarding the most suitable evacuation method for them. Some may be able to move out of the building using the staircase with the support of handrails, some may need an evacuation chair, some may need a person to escort them and so on.
- Train the person in operating the Manual Call Points (MCPs) and Emergency Door Release (EDRs) and ensure that they are able to reach these.
- Ensure that emergency evacuation maps are within their vision zone as per standards.
- Ensure that the pathway to a safe assembly area is made accessible. Appropriate seating should be made available in safe assembly areas for those who may not be able to stand for long.

6. Accessibility and Accommodation for people with difficulty using hands

Some people may have difficulty using one hand or both hands which may have been caused by amputation, fracture, cerebral palsy, muscular dystrophy, Parkinson's disease, loss of sensation due to leprosy, writer's cramp, repetitive stress injury or brittle bone or intense pain or any other issue that affects the use of hands/dexterity. Functional capacities vary from person to person i.e. some may have difficulty writing / typing, some may be slow in carrying out activities, some may have a limited range of movement, some may have difficulty with self-care activities, some may have difficulty with fine motor skills or may not have enough strength to lift and so on.

Providing the needed assistive devices and technologies

- Modified keyboards (one handed, light touch, etc.)
- Adapted writing tools

- Voice recognition software
- Adapted mouse/switches/eye trackers/sip and puff systems
- Adapted uniforms (which are easy to wear using, for example velcro, etc.)
- Adapted chair/table
- Adapted devices for daily living activities (plates/spoons, etc.)
- Adapted machines
- Hi tech bracelet which alleviates Parkinson-related tremors
- Tape recorder for recording lectures/trainings
- Hands free telephone
- Sensor based controls

Providing accessibility in the built environment

- Have auto doors/ easy to open doors and locks.
- Have auto / easy to operate taps, flushes, equipment, controls etc.
- Make adjustments for enabling the reach to switch boards, phone etc.
- Install a Home Automation system for controlling lighting, adjustment of temperature in rooms and appliances, security controlling switches and plugs and so on.

Ensuring accessibility of information, communication and technologies

- Ensuring compliance of websites/apps/kiosks etc. with web accessibility standards (which includes compatibility with assistive technologies such as speech to text, etc.).

Making recruitment inclusive

- Provide a scribe/assistive technology for doing assessments/filling up forms etc.
- Conduct oral assessments.
- Allot extra time for writing tests.

Making induction inclusive

- Appoint a scribe for filling in those joining forms that are to be manually filled.
- Allow the person to record any instructions, etc.

Other Accommodations for efficient working and participation

- Drivers should be sensitised to help with opening the door or with the luggage etc. as per individual need.
- Allow for an escort in case of travel, if required, or provide an extra daily allowance for hiring a caregiver.

Other Accommodations for Training programs and employee engagement activities

- Allow tape recording of lectures.
- Appoint note takers if necessary.
- Allot extra time/provide scribe for the tests
- Conduct oral assignments.
- Have an accessible online training modules with software compatible with speech recognition software.

Other Accommodations for Working efficiently and progressing in work

- Rearrange the workstation area to ensure everything important is kept within reach (plugs, telephones etc.).

- Assign a housekeeping person/peon for any specific tasks such as picking up things, etc. Assign a housekeeping person/peon to help with essential activities such as taking out the laptop from its bag, helping with washing hands and picking up a cup of coffee/tea, helping with eating, etc.
- Allow tape recording of meetings/briefings.

Developing a personalized emergency preparedness plan

- All emergency devices (alarms, doors, etc) should be easy to reach and operate. Adjust the height based on individual needs.
- Provide training in operating the alarms.
- Appoint a buddy for supporting the person if required

7. Accessibility and Accommodation for people with speech /language difficulties

Some people may have difficulty speaking, i.e. they may be nonverbal (may use sign language interpreter/communication board etc.), or may have issues with articulation (distortions, omissions) or fluency (stuttering etc) or voice (pitch, loudness etc.). They may or may not have language impairment.

People with language impairment may be able to speak well but may have difficulty comprehending what is being said/written or expressing their thoughts or a combination of both.

Speech and language disability can manifest in all age groups. There can be multiple causes for speech and/or language disability some of which are hearing disability, physical or mental trauma, cerebral palsy, autism, dementia, stroke, injury in the part of the brain that processes language and sounds, learning or intellectual disability and so on.

Providing the needed assistive devices and technologies

- Word Prediction software
- Text to speech software
- Communication Boards/software
- Dictionaries and spell/ grammar checkers

Providing accessibility in the built environment

- Install appropriate Signage i.e. direction and room signages which are picture based and easy to read and maps and interactive displays.
- Install video/chat provisions in emergency telephones in order to enable communication through gestures or writing.
- Provide Human Assistance if required.

Ensuring accessibility of information, communication and technologies

- Voice/call based should not be the only mode of interaction present. Ensure that chat and other nonverbal methods are present.
- Content should be written in easy to read language for a person with language disability.

Making recruitment inclusive

- Find the preferred mode to communicate and have the interview in that mode.
- Exempt the candidate from group discussions.
- Give more time to read/express views.
- Modify assessment by removing questions related to grammar if language is an issue.

Making induction inclusive

- Sensitize the team appropriately to ensure that no one makes fun of a person's way of speaking or their language errors.
- Understand the preferred mode of communication and always interact with the person in their preferred mode of communication.

Other accommodations for Travelling

- Helpdesk employees/drivers should be taught to answer queries by text.

Other accommodations for Training programs and employee engagement activities

- Ensure that an employee with speech/language difficulty is not evaluated for class participation in trainings. Typical grammar and spelling errors could be ignored.
- Allow the use of microphones in case the person has a feeble voice (lacking volume)

Other accommodations for Working efficiently and progressing in work

- Give more time to understand, process and manipulate information.
- Allow for sufficient time for a person to express herself/himself/themselves in her/his/their preferred mode of communication in meetings.
- Provide extra time for presentations.
- Provide the needed accommodations in order to participate effectively in situations involving interactions with clients, making presentations at conferences, supervising staff etc.

Developing a personalized emergency preparedness plan

- Emergency numbers should be such that it should be possible to communicate using text/video-based calls.
- Provide training in using the helplines and emergency procedures.
- Provide relevant information in a format suitable to the person.

8. Accessibility and Accommodation for people with intellectual difficulty

A person with intellectual disability may have difficulty functioning in the following areas i.e. intellectual functioning (such as learning, problem solving, judgement) and social/adaptive functioning (activities such as communication and self-care).

People with intellectual disabilities work in various sectors, based on the training received and individual skills and preference, such as hospitality, the IT sector (simple data processing work, logistics, call centres), factories (packaging and quality checking etc;), education (as teacher assistants), offices (clerical work) , retail (salesperson in retail stores) and so on . Intellectual disabilities could be congenital or caused later because of brain injury, Alzheimer's disease etc. Some people with cerebral palsy/autism could have multiple disabilities including intellectual disability.

Providing the needed assistive devices and technologies

- Word prediction software
- Speech to text software
- Screen readers
- Modified keyboards (large print letters/numbers, good contrast, with options of QWERTY and non-QWERTY keyboards)
- Alternative and augmentative communication boards

- Graphic Organisers
- Audio or video prompting devices
- Video based instructions
- Simple charts/handouts
- Calculators

Providing accessibility in the built environment

- Install appropriate signage which is consistent, with pictorial representations, with easy to understand symbols, good colour contrast and large text. Position the signages in places where there is good lighting and no glare.
- Implement a logical/intuitive layout of the building/workspace to enable easy navigation within the office.
- Use a suitable colour scheme and other detectable clues to differentiate between different areas of a building.
- Install photo-luminant strips on the floor to indicate exits.
- Ensure an appropriate location for the reception/enquiry counter which is easily visible from the entrance and ensure that it is manned by trained/sensitised staff.
- Ensure the availability of human assistance/guides.

Ensuring accessibility of information, communication and technologies

- Create easy to navigate (with intuitive design features) websites/ apps/kiosks etc.
- Ensure easy to read content by using simple language, non-usage of jargons, use of pictures, dynamic font sizes, colour contrast etc.
- Provide for tolerance for errors (for example, allow undo actions)
- Suggest corrections where applicable.
- Ensure the availability of brochures in easy to read formats.

Making recruitment inclusive

- Implement a modified assessment/interview by focussing on task based questions.
- Use simple language and easy to understand language structures (by paraphrasing, giving options to choose from etc.) in an interview.
- Allow a support person to sit in during the interview.
- Provide information about the job in easy to comprehend language.
- Provide assistance in filling application form.

Making induction inclusive

- Provide HR Policies and other policies in an easy to understand format or provide a support person who could explain the policies in simple language.
- Provide assistance in filling the various joining forms.
- Sensitize the team to treat the person with respect and in age appropriate manner.

Other accommodations for Traveling

- Arrange for door to door drop and pick up if required (and if transport is provided).
- Impart training in order to use public transport.
- Allow an escort/support person to accompany the employee for outstation travel.
- Provide contact numbers and emergency numbers for getting in touch if required.
- Impart training to access help lines and suitably sensitise the helpline staff and supporting drivers.

Other accommodations for Training Programs and employee engagement activities

- Modify the training methodology by making it a combination of regular and customized/individualised training.
- Impart the training at a slower pace and give additional time to finish the training. Break the job related tasks into simpler and sequential steps by using pictorial, colour coded simple language checklist/charts.
- Modify the training curriculum suitably if required.
- Allow a support person/job coach, who can assist the employee suitably, to sit in during the training.
- Appoint a buddy and a mentor to provide support.
- Provide reinforcements and feedback at frequent intervals.
- Provide large print, easy to read brochures and learning materials.

Other accommodations for Working efficiently and progressing in work

- Provide a job coach.
- Demonstrate, rather than describe, what the job requires.
- Allow for job restructuring by reallocating less crucial functions to another employee.
- Provide a tape recorder to record steps and directives which are part of a task to serve as a reminder. Use suitable visual and audio prompts.
- Modify work schedules or implement shift changes as needed.
- Allow parents to support in the training and for settling in.
- Give oral instructions instead of written ones.
- Create schedules/task lists (using technologies/charts) to aid the employee.

Developing a personalised emergency preparedness plan

- Install visible and easy to read signage for emergency alarms etc.
- Train the person concerned to use the emergency alarms and emergency numbers.
- Impart training in evacuation procedures so that the employee can exit through the emergency exit to reach the safe assembly area with ease.
- Assign buddies to support the employee.

9. Accessibility and Accommodation for Neurodiverse people (includes people with psycho-social disability, autism and specific learning disabilities)

Neurodiversity is a broad term that is used to refer to a range of variations in brain and mind functioning. Autism, attention deficit hyperactivity disorder (ADHD), specific learning disabilities, Tourette's syndrome, mental health conditions (psycho-social disability) are some of the recognised neuro divergences. Neurodivergent persons are those persons whose brain functions differ from those who are neurologically typical (or neurotypical).

1. Specific Learning Disabilities is an umbrella term for a wide variety of learning difficulties. A specific learning disability can affect a person's ability to acquire and apply one or more processes involved in reading or writing or language or math skills. Some specific terms that are used to describe the specific learning disability are perceptual disabilities, dyslexia, dyscalculia, dysgraphia, dyspraxia and developmental aphasia. The impairment could be congenital or acquired later due to stroke or brain injury.
2. A person with autism or autism spectrum may have difficulty in social interactions and communication. They could have repetitive behavioural issues and sensory issues such as oversensitivity or under sensitivity to sounds, smells or touch. The term spectrum indicates that there is a range.

3. The term psychosocial disability refers to disability arising from mental health issues. A mental health issue may involve sudden and unforeseen changes in emotion, thinking or behaviour, or all of these. Mental health conditions can manifest in many forms including anxiety disorder, depression, schizophrenia, bipolar disorder, dementia, obsessive behaviour, extreme mood swings and eating related issues. It may or may not be a permanent condition and in many cases, it can be mitigated to a great extent with medication and/or therapy.

It is important for employers to understand that the above impairments, though clubbed under the term 'neurodiversity', are quite different and diverse. Note that there are also variations based on how each person is experiencing their condition

Assistive devices and technologies

People with Specific Learning Disabilities

- Several Apps for planning/organizing/ reminders/ adapted watches for tracking/keeping time.
- Screen reading software /OCR Reader for those with reading /print disabilities.
- Speech to text software.
- Calculators for those with difficulty in math.
- Spell/grammar check/ proofreading software.
- Dictionaries and word prediction software.
- Organising/ writing/math tools.
- Digital recorders for those with memory issues.

People with Psychosocial disabilities

- Headphones for noise cancellation for people with oversensitivity to sounds or to listen to music to reduce auditory hallucination.
- Apps for health and mood monitoring/online therapy/meditation/ organising etc.

People with Autism

- Augmentative and Alternative Communication (communication boards and software).
- Headphones for noise cancellation for people with oversensitivity to sounds.

Accessibility in the built environment

- Ensure the availability of different seating options for group/ collaborative spaces (also termed as open workspaces) and for doing individual work/quiet areas/enclosed desks.
- Ensure that adjustable workstations (for sitting and standing) are procured or existing ones are modified suitably.
- Ensure good acoustics so that background noise is reduced.
- Ensure that lighting is made adjustable with light levels being variable across a range. Also ensure access to daylight and good ventilation.
- Ensure the presence of a logical layout to help in navigation/wayfinding.
- Ensure that the surfaces are non reflective with no complex patterns on them as this may lead to confusion/illusion/disorientation.
- Install good signage with clear and easy to understand information. Install appropriate directional signages (including pictorial).
- Ensure the availability of game/recreation rooms/art walls, nourishment stations and resting rooms.
- Create reserved parking spaces.
- Provide maps and emergency information in audio format/easy to read format.

- Implement specific changes to landmarks, such as installing wall paintings, fountains, creating colour changes etc., as these help the person with disability orient themselves properly with respect to where they are in the building/campus.
- Ensure availability of human assistance.

Accessibility of information, communication and technologies

- All websites/apps etc. should meet the accessibility guidelines. Some features such as intuitive design, well ordered content, higher colour contrast, easy to understand content, tolerance to error, no flashing images/texts, non-cluttered design, controls for moving content, captions, alt text, audio descriptions etc help everyone and particularly neuro-diverse people.

Recruitment

People with Specific Learning disabilities

- Provide multiple methods for applying for a job, such as filling in the application online, posting CV etc.
- Modify the assessments by removing grammar based questions /ignoring spellings for a person with dyslexia, removing math problems for a person with dyscalculia, etc.
- Provide computer based assessments/provide a scribe for the tests and allot extra time if required.
- Avoid hypothetical and open-ended questions.
- Allow individuals to demonstrate their skills if they have difficulty answering questions regarding their capacities and skills verbally.

People with Psychosocial disabilities

- Change the time of the interview based on individual preferences.
- Answer any queries related to work, such as hours of work, need to travel, deadlines, etc.
- Ensure a quieter place for the interview if requested and give more time to answer questions.
- Do not assume that the person will be incapable of doing the job or managing stress etc.

People with Autism

- Modify the application and selection procedure suitably (for example, simplify the application procedure, relax the educational qualifications requirement, set up a task based interview, ask them to demonstrate their skills and apply an observation based assessment).
- Share the interview questions in advance and avoid open ended or hypothetical questions or consider not having an interview at all for those who are not comfortable (use other methods such as observation/task based assessments).
- Do not judge negatively if a person avoids eye contact or refuses to shake hands or does not smile or has certain repetitive behaviours.
- Allow the use of a calculator or other assistive technologies if required.

Induction

- Provide the accommodations required at the earliest.
- Allow a support person/parent to come to settle the person down at the workplace if required.
- Provide a job coach if required.
- Give more time for settling in and adjusting to the routine.

Travelling

- Ensure non discrimination in travelling (one should not assume that neuro diverse people will not be able to take the stress of travel unless they specifically say so).
- Provide suitable emergency numbers so that the employee is able to reach out for any support during the travel period.
- Allow a support person to travel along if required.

Training programs and employee engagement activities

- Modify training methods based on need (provide individualised training, on job training and allow taping of lectures etc.).
- Extend the period of training and have retraining sessions after a long leave of absence if required.
- Modify the training curriculum suitably based on need.
- Modify assessments suitably (for example administer oral exams and provide a scribe/reader for writing the exam).
- Modify/alter educational materials by simplifying the language used and making the soft copy accessible for person with print disability.
- Allow for flexibility in attendance requirements for a person with psychosocial disabilities.
- Highlight key points, use flowcharts and mind maps to explain concepts for a person with specific learning disability.
- Some good practices that can be followed during presentations, such as stating objectives clearly in the beginning and giving a summary in the end and starting with a recap in the next session etc.

Working efficiently and progressing in work

People with Specific Learning Disability

- Allow the employee to use her/his/their own work and organizational system at the workplace.
- Provide on the job training.
- Give oral instructions instead of written instructions for a person with difficulty reading.
- Divide tasks into organized checklists.
- Allow for flexibility in work (for example, modify office timings, allow for a work from home option or have some days in office and some days at home etc.).
- Provide instructions through bullet points rather than paragraphs for people with reading difficulty. Verbally explain the instructions if required.
- Ensure job restructuring if required.
- Have regular meetings to discuss and share issues so that they can be resolved.

People with Psycho-social disability

- Allow flexibility in work timings (for example, modify office timings, allow for work from home option or have some days in office and some days at home etc.).
- Provide frequent short breaks if required.
- Ensure the availability of a counsellor and give time off for counselling sessions.
- Give the employee a choice of workstation to use.
- Allow the employee to wear headphones.
- Ensure job restructuring.
- Conduct regular meetings to discuss and share issues so that they can be resolved.
- Provide a mentor.

- Have generic mental health awareness programmes/campaigns which are not person specific.
- Encourage senior level persons in the organization to share her/his/ their or their family members mental health concerns as this usually gives the employee with disability confidence to talk about her/his/their issues.

People with Autism

- Provide a job coach.
- Provide on the job training.
- When making any change, share the new rule and the reason for the change and give sufficient time to adapt.
- Modify instructions and feedback mechanisms so that they are more suited to the needs of the employee.
- Give extra time to understand job responsibilities and to perform them.
- Modify the work environment suitably if it is seen that certain types of lighting, noise, scent or clutter impacts the employee negatively.
- Allow for job restructuring (if the person does not want to take calls then give extra written work, etc.).
- Provide a buddy and a mentor.
- Hold periodic/regular meetings to discuss progress and to resolve any issues in a timely manner.

Personalized emergency preparedness plan

- Train the employee in using alarms and emergency numbers.
- Conduct mock drills regularly in evacuation procedures so that the person can evacuate safely and so doesn't panic during the actual drill.
- Mention specific requirements (such as emergency medication or any other support) in the personalised emergency evacuation plan.
- Ensure emergency information in accessible formats (oral instruction for a person with difficulty reading and visual information for a visual learner).
- Ensure that exits and the route to the Safe Assembly Area are clearly marked.
- Provide individualised training for employees so that they are able to note certain cues/ landmarks etc. to reach the alarms or the safe assembly area easily and quickly.
- Assign buddy/ies to provide support during emergencies.

10. Accessibility and accommodations needed for people with chronic and disabling medical conditions

There are several medical conditions that may be disabling. Several of these medical conditions have been specifically named in the RPWD Act, such as chronic neurological conditions like Parkinson's and Multiple Sclerosis and blood disorders like Hemophilia, Thalassemia and Sickle Cell disease. Apart from these, there are also other medical conditions which are not listed as specified disabilities in the Act but which could be disabling, such as HIV AIDS, renal disease, stroke, epilepsy, heart condition, chronic pain etc. People having these conditions may also need reasonable accommodation which needs to be provided and note that they are also protected under the Act as they fall under the broader definition of persons with disabilities. As mentioned before, as an employer, it is not important or necessary to understand the medical condition. However, it is important to understand the difficulties the person is facing at work and provide the needed accommodation.

Accommodation will depend on the issues that a person is facing due to the medical condition. It could be mobility, visual, psycho-social or physical or a combination of issues. Most of these conditions are not visible. There may be certain times/days/periods that may be more difficult. Refer to the relevant sections for different disabilities and importantly, consult with the person concerned so that the process of extending the accommodation can be expedited.

ANNEXURE

TYPES OF DISABILITIES LISTED IN THE RPWD ACT 2016

As per the Schedule of the RPWD Act, following are the definitions of specified disabilities.

1. Locomotor disability: a person's inability to execute distinctive activities associated with movement of self and objects resulting from affliction of musculoskeletal or nervous system or both.
2. Cerebral palsy means a Group of non-progressive neurological condition affecting body movements and muscle coordination, caused by damage to one or more specific areas of the brain, usually occurring before, during or shortly after birth.
3. Dwarfism means a medical or genetic condition resulting in an adult height of 4 feet 10 inches (147 centimeters) or less.
4. Muscular dystrophy means a group of hereditary genetic muscle disease that weakens the muscles that move the human body and persons with multiple dystrophy have incorrect and missing information in their genes, which prevents them from making the proteins they need for healthy muscles. It is characterised by progressive skeletal muscle weakness, defects in muscle proteins, and the death of muscle cells and tissue.
5. Leprosy cured person means a person who has been cured of leprosy but is suffering from—
 - (i) loss of sensation in hands or feet as well as loss of sensation and paresis in the eye and eye-lid but with no manifest deformity;
 - (ii) manifest deformity and paresis but having sufficient mobility in their hands and feet to enable them to engage in normal economic activity;
 - (iii) extreme physical deformity as well as advanced age which prevents him/her from undertaking any gainful occupation, and the expression "leprosy cured" shall construed accordingly;
6. Acid attack victims means a person disfigured due to violent assaults by throwing acid or similar corrosive substances.
7. Blindness means a condition where a person has any of the following conditions, after best correction—
 - (i) total absence of sight; or
 - (ii) visual acuity less than 3/60 or less than 10/200 (Snellen) in the better eye with best possible correction; or
 - (iii) limitation of the field of vision subtending an angle of less than 10 degree.
8. Low-vision" means a condition where a person has any of the following conditions, namely:—
 - (i) visual acuity not exceeding 6/18 or less than 20/60 upto 3/60 or upto 10/200 (Snellen) in the better eye with best possible corrections; or
 - (ii) limitation of the field of vision subtending an angle of less than 40 degree up to 10 degree.
9. Deaf means persons having 70 DB hearing loss in speech frequencies in both ears.
10. Hard of hearing means person having 60 DB to 70 DB hearing loss in speech frequencies in both ears.

11. Speech and language disability means a permanent disability arising out of conditions such as laryngectomy or aphasia affecting one or more components of speech and language due to organic or neurological causes.
12. Intellectual disability, a condition characterised by significant limitation both in intellectual functioning (reasoning, learning, problem solving) and in adaptive behaviour which covers a range of every day, social and practical skills.
13. Specific learning disabilities means a heterogeneous group of conditions wherein there is a deficit in processing language, spoken or written, that may manifest itself as a difficulty to comprehend, speak, read, write, spell, or to do mathematical calculations and includes such conditions as perceptual disabilities, dyslexia, dysgraphia, dyscalculia, dyspraxia and developmental aphasia;
14. Autism spectrum disorder means a neuro-developmental condition typically appearing in the first three years of life that significantly affects a person's ability to communicate, understand relationships and relate to others, and is frequently associated with unusual or stereotypical rituals or behaviours.
15. Mental illness means a substantial disorder of thinking, mood, perception, orientation or memory that grossly impairs judgment, behaviour, capacity to recognize reality or ability to meet the ordinary demands of life, but does not include retardation which is a condition of arrested or incomplete development of mind of a person, specially characterised by subnormality of intelligence.
16. Multiple sclerosis means an inflammatory, nervous system disease in which the myelin sheaths around the axons of nerve cells of the brain and spinal cord are damaged, leading to demyelination and affecting the ability of nerve cells in the brain and spinal cord to communicate with each other;
17. Parkinson's disease means a progressive disease of the nervous system marked by tremor, muscular rigidity, and slow, imprecise movement, chiefly affecting middle-aged and elderly people associated with degeneration of the basal ganglia of the brain and a deficiency of the neurotransmitter dopamine.
18. Hemophilia means an inheritable disease, usually affecting only male but transmitted by women to their male children, characterised by loss or impairment of the normal clotting ability of blood so that a minor wound may result in fatal bleeding.
19. Thalassemia means a group of inherited disorders characterised by reduced or absent amounts of haemoglobin.
20. Sickle cell disease means a hemolytic disorder characterised by chronic anemia, painful events, and various complications due to associated tissue and organ damage; "hemolytic" refers to the destruction of the cell membrane of red blood cells resulting in the release of hemoglobin.
21. Multiple Disabilities (more than one of the above specified disabilities) including deaf blindness which means a condition in which a person may have combination of hearing and visual impairments causing severe communication, developmental, and educational problems.
22. Any other category as may be notified by the Central Government.

ABOUT US

Mphasis

Mphasis (BSE: 526299; NSE: MPHASIS) applies next-generation technology to help enterprises transform businesses globally. Customer centricity is foundational to Mphasis and is reflected in the Mphasis' Front2Back™ Transformation approach. Front2Back™ uses the exponential power of cloud and cognitive to provide hyper-personalized (C=X2C²_{TM}=1) digital experience to clients and their end customers. Mphasis' Service Transformation approach helps 'shrink the core' through the application of digital technologies across legacy environments within an enterprise, enabling businesses to stay ahead in a changing world. Mphasis' core reference architectures and tools, speed and innovation with domain expertise and specialization are key to building strong relationships with marquee clients. [Click here to know more.](#)

NCPEDP

National Centre for Promotion of Employment for Disabled People (NCPEDP) (www.ncpedp.org) is a cross-disability, non-profit organization, working as an interface between the Government, Industry, International Agencies, and the Voluntary Sector towards empowerment of persons with disabilities. Registered in 1996, NCPEDP has, since then, successfully advocated for several policy changes that have positively impacted the lives of people with disabilities.

DEOC

DEOC (www.deoc.in), set up in 2007 with the aim of creating an inclusive world, provides consulting services in the areas of accessibility and policies related to inclusion of people with disabilities. It undertakes policy and accessibility audits, trainings and sensitization, research and evaluation to help organizations to become more inclusive.



**NATIONAL CENTRE FOR
PROMOTION OF EMPLOYMENT
FOR DISABLED PEOPLE**

E - 150, East of Kailash, New Delhi - 110 065, India

Tel: 91-11-26221276 / 26221277 / 49122868

E-mail: secretariat.ncpedp@gmail.com Website: www.ncpedp.org