

Reasonable Accommodation Policy

This policy is to be read in conjunction with the
An Post Disability Inclusion Policy



Effective Date of this Policy is: March 2023

Policy Review Date is: March 2028 (subject to changes in legislation)

Queries to: Diversity & Inclusion; Employee Relations

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1. Purpose of this policy

- 1.1** The Employment Equality Acts (1998 - 2015) place an obligation on employers to provide an employee who has a disability with reasonable accommodation, referred to in the Act as 'appropriate measures'. The reasonable accommodation is something that helps to alleviate a substantial disadvantage due to an impairment or medical condition.
- 1.2** The purpose of providing a reasonable accommodation is to enable a disabled person to:
- (i) have access to employment;
 - (ii) participate or advance in employment; or
 - (iii) undergo training.
- 1.3** Any accommodation should be reasonable and should not impose a disproportionate burden on an employer. Such measures may include training resources or adaptations to:
- Workplace premises in order to make them more accessible for employees with disabilities;
 - Work equipment (for example computer screen reading programmes for employees who are visually impaired);
 - Patterns of working time;
 - Time off for medical appointments; and/or
 - The distribution of tasks.
- 1.4** In fulfilment of its responsibilities under disability legislation and its commitment to supporting employees who unfortunately experience a change in their circumstances over the course of their employment, the Company has, historically, applied the principles of reasonable accommodation in returning employees to work in an effective capacity following an extended period(s) of sick absence. This is a key element of the Company's Attendance Support & Management Process.
- 1.5** While the impacts of disability are varied, as are the needs of individuals in terms of reasonable accommodation, the Company recognises that employees with a disability, or those who acquire one, should be able to discuss this with the Company even where it has no material impact to date on their ability to attend work regularly. In this regard this policy is intended to support employees in disclosing their disability, and provide guidance on how to request additional assistance to enable them to perform effectively in their role.
- In this regard this policy is intended to support employees; in disclosing their disability, and provide guidance on how to request additional assistance to enable them to perform effectively in their role.
- 1.6** An Post is committed to providing an accessible, inclusive environment, to enable employees with disabilities to feel supported to make the fullest possible contribution in their place of work.

2. Disclosing a Disability

- 2.1** Disclosure is the term used for making a disability known, or revealing a hidden disability. In work, disclosure means informing your employer of your disability.
- 2.2** The employee with a disability has the choice whether or not they disclose their disability. It is a personal choice. An employee may be anxious about disclosure, and worry about how it will be received.
- 2.3** An employee does not need to share their medical history, just enough relevant information to explain the circumstances which may require a reasonable accommodation in their work situation. Only those who need to know and understand the employee's disability-related needs, and who can assist in putting supports in place need know about the disability. Employees will be treated with the utmost respect and dignity and at all times will be consulted with.

2.4 Discussing a Disability

- 2.4.1** An Post encourages employees who feel they fall within the definition of a person with a disability under the Disability Act 2005 to disclose their disability so we can understand and respond to their disability-related needs.
- 2.4.2** Where a colleague wishes to disclose their disability and/or request a reasonable accommodation, they can engage with:
- (i) Their line manager/s.
 - (ii) In circumstances where an employee is not comfortable disclosing their disability to their line manager they can make a confidential disclosure to Occupational Health, and discussions can begin about what accommodations (if any) are required.

If some form of accommodation is sought this, more than likely, will involve the disclosure of relevant information to the employee's line manager to enable the reasonable accommodation arrangements to advance. Employee consent to such a disclosure will be required with confidentiality maintained about medical circumstances.

- 2.4.3** Where the employee discusses the need for reasonable accommodation with their line manager, the assistance of Occupational Health may be required in assessing the functional impact of any disability and the input of HR may also have to be sought depending upon the significance of any change by way of reasonable accommodation.
- 2.4.4** If an accommodation requiring an adjustment to terms of employment is being sought e.g. a change in attendance obligations and/or work responsibilities, inputs from HR and/or line management at a level above will most likely be required in reaching a decision, particularly where implementing the accommodation requested impacts on colleagues.

3. Reasonable Accommodation Passport

3.1 What is a Reasonable accommodation passport?

3.1.1 A Reasonable Accommodation Passport is designed for employees who require workplace accommodations because of a disability, impairment, health condition, mental health issue or long term injury.

3.1.2 It is a confidential written document, agreed between an employee and their manager. It records the employee's disability and the accommodations in place. It can be periodically reviewed in accordance with changes to the employee's disability and/or role within the Company. If an accommodation affects the existing terms and conditions of employment, the local HR manager should be included in conversations.

3.1.3 It provides clarity around the employee's accommodations, and reduces the need to discuss the accommodations in circumstances where a new line manager is appointed.

3.1.4 It may be the case that accommodations are not immediately required, but the employee may feel secure knowing that the Company has a record of their disability, as circumstances may change in the future.

3.2 A Reasonable Accommodation Passport allows employees to:

- Have a conversation about how their disability has an impact on their work;
- Explain the barriers they encounter which impede their work;
- Recommend accommodations which would make work easier for them;
- Share any change to their disability or circumstance which would have a bearing on the accommodation/s in place;
- Review the effectiveness of accommodations in place;
- Feel reassured that correct actions will be taken if they become unwell at work, and what to do/who to contact in a case of emergency;
- Know how and when their manager will keep in touch, for example during times of absence from work due to their disability.

4. How is a Reasonable Accommodation determined?

4.1 An Post will consult and engage with the disabled employee, to discuss their specific needs. To support reasonable accommodation discussions, An Post may obtain inputs from the HR Manager/Occupational Health/An Post Chief Medical Officer/Head of Group Safety and potentially staff representatives. If necessary, and depending on specific needs, an independent external expert/party may be called upon by the Company for support and guidance.

4.2 Whilst the Company reserves the right to make the final decision on the type of accommodation the Company is prepared to put in place (be it temporary or longer term), we are committed to considering all potential options following consultation with the employee, and an accommodation will not be unreasonably withheld.

We will also seek to ensure that any accommodation does not place a disproportionate burden on other employees or the Company.

4.3 In determining what constitutes a disproportionate burden for the Company, considerations include:

- the financial cost of the reasonable accommodation;
- the resources available to the Company;
- the possibility of securing external funding/support, as well as;
- costs and impact on business productivity.

In determining whether an additional burden on colleagues is a disproportionate one, considerations include:

- The reasonableness of the changes needed to support their colleague (who is requesting the accommodation);
- Their ability to do their jobs within normal working hours, and;
- Any impact on their overall productivity and personal working arrangements.

4.4 Subject to 4.3 above, where the reasonable accommodation has a direct impact on work colleagues, including managers, the support and understanding of those colleagues will be expected and may be enlisted by sharing information about the specific circumstance, and only with the permission of the employee with the disability.

4.5 An Post and its employees are committed to responding to an employee request for accommodation in a conscientious and timely manner.

5. Provision during the Recruitment Process

- 5.1** All An Post job advertisements encourage people to enquire about accessibility issues, and to request a reasonable accommodation at any stage during the application process.
- 5.2** A request should be made when the applicant is aware of potential barriers to employment which may impede their ability to compete for the role advertised. A request may be made by the Company for documentation related to the disability and necessary for the determination of the reasonable accommodation.
- 5.3** We encourage disclosure/sharing of information around disability at every stage during the recruitment process if required by the candidate. This includes, but is not limited to; the job application, notification of interview, candidate interview, job offer, and on-boarding.
- 5.4** An Post HR and hiring managers have been trained in disability awareness, inclusive (disability) recruitment, and reasonable accommodations.

6. Implementation of this Policy

- 6.1** Managers are to familiarise themselves with this policy and be mindful of any additional needs expressed by disabled employees. Managers shall intervene in any instance where discriminatory behaviour is observed or brought to their attention.
- 6.2** If a manager is made aware either formally/informally of an employee having an issue/ disability which causes a substantial impact on their ability to work at An Post, the manager has an obligation to ask the individual whether they require support to enable that person to be fully capable of performing their role to the required standard.
- 6.2** This Policy will be supported by HR Support Services including; HR Managers, Occupational Health & Support Services, and Safety & Environment.

7. Review

- 7.1** This policy will be reviewed on a regular basis in line with changes in the law, relevant case law, and other developments. This policy is a collective agreement registered with the Joint Conciliation Council and any amendments will be made through that forum.
- 7.2** This policy is to be read in conjunction with the An Post Disability Inclusion Policy.

