

Disability Inclusion Policy



This policy is to be read
in conjunction with the
An Post Reasonable
Accommodation Policy



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Queries to: Diversity & Inclusion; Employee Relations
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1. Introduction

- 1.1** An Post is striving to develop an inclusive workplace where everyone feels accepted, supported and valued - a place where every employee feels they belong.
- 1.2** People with disabilities have equal status in law with everyone else. This requires that disabled people are not disadvantaged in terms of access to the workforce and have the opportunity to participate on equal terms in the workplace.
- 1.3** An Post is committed to equality of opportunity in all employment practices. An Post is committed to the development and implementation of progressive measures to promote and support the employment of disabled people. The purpose of this policy is to provide guidance in relation to the inclusion of disabled people in the workplace.
- 1.4** Through its policies and practices, An Post aims to ensure that people with disabilities are employed in roles that match their skills and abilities, and are not unnecessarily disadvantaged by their disabilities. Through providing reasonable accommodations, An Post can ensure that disabled employees feel supported to make the fullest possible contribution to their work.
- 1.5** An Post aims to ensure equality of opportunity in the workplace for disabled people, based on three guiding principles:
 - (i) The creation of a working environment in which differences are respected and in which employees, clients and customers are valued as individuals;
 - (ii) In accordance with the provisions of the Employment Equality Acts (1998-2015), the Disability Act 2005, the Equal Status Act 2000, and the United Nations Convention on the Rights of Persons with Disabilities, no employee nor job applicant to An Post will receive less favourable treatment on the grounds of disability;
 - (iii) Practical facilitation of disabled people to avail of employment and career opportunities, insofar as it is reasonably practical.

2. Definition of Disability

- 2.1** Disability is defined in the Disability Act 2005 as: "a substantial restriction in the capacity of the person to carry on a profession, business or occupation in the State or to participate in social or cultural life in the State by reason of an enduring physical, sensory, mental health or intellectual impairment".
- 2.2** The Employment Equality Acts (1998-2015) outlaw discrimination in relation to employment. An Post do not discriminate based on gender, age, race, religion, marital status, sexual orientation, disability, membership of the Travelling community, or family status. This policy focuses specifically on the employment of people with disabilities.

3. Types of Disability

- 3.1** The definition of a disability that is set out in law is deliberately broad ranging. It is important to realise that it is not only people with physical disabilities who fall within the definition. While some disabilities are visible (e.g. as in the case of people who have cerebral palsy or who are wheelchair users), others are not readily apparent.
- 3.2** The term 'disability' can cover a wide range of circumstances, not all of which are visible, including; life-limiting illnesses, vision impairment, deaf or hard of hearing, mental health conditions, intellectual disabilities, autism spectrum disorders or mobility disabilities.
- 3.3** Furthermore, the same disability can vary in its impact and affect people differently. While some people with disabilities may require additional supports and/or equipment to work effectively, others may not require any supports.

4. Responsibility for upholding Equality Legislation

- 4.1** In accordance with the Disability Act 2005, An Post is required to provide employment opportunities to people with disabilities. In doing so, the Company is required to provide reasonable accommodation supports to enable a disabled person to fully carry out their role, unless the level of accommodation required would constitute a disproportionate burden on the Company.
- 4.2** An Post has a responsibility as an employer for developing policy and promoting best practice in equality of opportunity for all employees. However, this does not always mean that everyone must be treated in exactly the same way.
- 4.3** An Post recognises the importance and, in some cases, the necessity, of supportive action in creating equality of opportunity for people with disabilities. It must be recognised that treating everyone the same way may lead to the continuing exclusion of individuals or groups protected by the legislation.
- 4.4** If a disability is a barrier to effective employment, the Company will explore whether it can adopt measures to remove obstacles that may exist, thereby providing equal access to employment opportunities and services, provided the accommodations required do not place the Company under a disproportionate burden.
- 4.5** Data provided for the purpose of the provision of reasonable accommodation or any other purpose will be treated in confidence and used only for the purposes of supporting people with disabilities in the working environment.

5. Reasonable Accommodation, Equipment & Facilitation

*** Please read the separate An Post Reasonable Accommodation Policy in conjunction with this Disability Inclusion Policy.**

- 5.1** An Post acknowledge that under the Employment Equality Acts (1998-2015), employers are obliged to take appropriate measures - known as reasonable accommodations to support disabled people to work effectively, unless the costs of doing so are disproportionate. These measures enable disabled people to have access to employment, to participate or advance in employment, and to undergo training. Such measures may include training resources or adjustments to:
- Workplace premises in order to make them more accessible for employees with disabilities,
 - Work equipment,
 - Patterns of working time, and/or
 - The distribution of tasks.

5. Reasonable Accommodation, Equipment & Facilitation (Con)

5.2 As stated above, this policy aims to create a working environment in which differences are respected and in which people; employees, clients and customers are valued as individuals.

An Post will take all reasonable steps to provide employees with disabilities with a workplace compatible with their particular needs. In so doing, the Company will fully consult with the individual before, during and after the accommodation has been provided.

5.3 The Company recognises the necessity to consult with employees and applicants with disabilities in respect of its duty to make reasonable accommodations. It is also recognised that in the majority of cases, those with a disability will have identified their own reasonable accommodations and their own innovative ways of adapting their environment to suit their needs.

5.4 The Company will be flexible in exploring what changes or reasonable accommodations can be made to the workplace or the way work is done. Such accommodations may include the provision of specific supports and facilities, as appropriate, to ensure that the person is both competent and capable of doing the job. This may include changes in the provision of aids and adjustments as well as physical changes to buildings.

5.5 Many straightforward/temporary accommodations can be agreed at a local level, and arrangements can be made informally between the employee and the line manager. These supportive arrangements may not require a formal process, for example requesting and securing time off to attend medical appointments.

5.6 Access arrangements to Company premises will be reviewed on an ongoing basis in relation to the requirements of people with disabilities.

5.7 A reasonable accommodation may require alterations to premises to improve accessibility. It is acknowledged, however, that progress might be constrained by the wide variations in the types of premises occupied by Company employees.

5.8 In general, the realisation of an employee's full potential in the workplace often depends on the method of work organisation and/or provision of work facilities or aids. The same principle holds in relation to disabled people, the only difference being the need for the employer and work colleagues alike to be open to; a greater diversity of work organisation, methods and facilities, and to consider affording additional forms of assistance or facilitation to enable particular persons to realise their abilities, and contribute effectively to their work, provided the Company is not placed under a disproportionate burden.

5.9 In order to determine whether an accommodation will result in a 'disproportionate burden' to the Company, considerations include:

- The financial cost of the accommodation
- The resources available to the Company
- The possibility of securing external funding/support
- The costs and impact on business productivity.

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.

A reasonable accommodation should not put a disproportionate burden on a colleague. To determine a 'disproportionate burden' to a colleague, 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.

5.10 When determining the costs of the accommodation, An Post commits to engaging with relevant stakeholders, which may include (some/all of) the following:

- The employee
- The line manager
- Trade Union Representative
- Head of Group Safety
- Chief Medical Officer
- Occupational Health Specialist
- Access Officer
- Human Resources
- Work colleagues
- A disability organisation
- An independent external expert/party

6. Health & Safety and Evacuation Procedures

- 6.1** Local managers and employees with disabilities should coordinate their activities to ensure that all aspects of health and safety in the working environment are carefully taken into account.
- 6.2** Where an employee makes it known that they require assistance to evacuate the building in an emergency, the local manager should contact the Safety & Environment Section to prepare a Personal Emergency Evacuation Plan.
- 6.3** The Personal Emergency Evacuation Plan will be prepared by Safety & Environment in conjunction with the employee who requires assistance (whether by reason of their physical and/or non-visible disability) and the local manager. Where the Personal Emergency Evacuation Plan stipulates additional training for employees, this will be provided.
- 6.4** Emergency Evacuation Plans are tested regularly, and any issues arising relating to disabled people will be addressed as a matter of priority.

7. Employment target for people with disabilities

- 7.1** By 2024, An Post will have a legal responsibility for the employment of 6% of its total employee population by disabled people, as defined under the Disability Act 2005.
- 7.2** An Post is required to report annually on the percentage of employees with disabilities as part of the statutory part 5 Disability Act 2005 return.

Employees are made aware that their data will be anonymised, treated in a confidential manner, and included within the overall return to the Monitoring Committee overseeing the implementation of the Disability Act in the Department of the Environment, Climate and Communications. An employee who does not wish their anonymous data to be included in the Part 5 return can inform us of this at the time of disclosure.
- 7.3** Information regarding the percentage of employees with disabilities will be published in an accessible format in the An Post Annual Report.

8. Inclusion in the Workplace

8.1 The Company envisages the application of the Disability Inclusion Policy principles outlined above at three levels:

- at the employment (recruitment and selection stage);
- in the assessment of employees for assignment and promotion;
- in assisting the restoration to effectiveness of employees following illness or injury.

8.2 Recruitment and Selection

8.2.1 Job advertisements will explicitly welcome applicants from the wider community, including those with disabilities. Job advertisements will include the following:

“At An Post we appreciate the value that diversity brings and believe our workforce should be reflective of the customers and communities we serve. That is why we do not discriminate based on gender, age, race, religion, marital status, sexual orientation, disability, membership of the Travelling community, or family status. An Post is committed to having an inclusive workplace where every employee feels they belong. If you require accommodations to be made during the recruitment process, or have questions relating to accessibility please contact us.”

Applicants invited to aptitude testing/interview are invited to inform us in advance of their disability or condition, so that appropriate supportive arrangements may be made.

8.2.2 As a positive measure, An Post from time to time may hold job competitions with the aim of ensuring that by 2024, 6% of all recruits to An Post are disabled people.

8.2.3 It is Company policy that applicants are selected for particular posts on the basis of their competencies for the advertised role. Interview boards will not make assumptions about the suitability of individuals for certain types of work based on any criteria not relevant to the job. Shortlisting criteria will not directly or indirectly discriminate against disabled people.

8.2.4 The primary criterion for employment, placement or promotion will be the employee's ability to do the job i.e. to meet the requirements, in terms of mental or physical capability, for discharging the demand of the job substantially and effectively.

8.2.5 The Company will consider a reasonable accommodation which might be employed to facilitate a prospective employee with a disability. Where the suitability (of a disabled person) for employment is concerned, the candidate must be:

- capable of performing the job and/or;
- capable of performing the job on the basis of reasonable accommodation;

So, notwithstanding the requirement not to discriminate, it is perfectly legitimate not to appoint someone if:

- they are deemed to be medically unfit;
- other candidates have better competencies;
- if they are not capable of doing the job with reasonable accommodation.

8.3. Career Development

8.3.1 Employees with disabilities will have the same opportunities as all employees to develop their skills for future career development.

8.3.2 An Post will ensure that employees with disabilities are provided with the same opportunities to attend training and develop skills and experience necessary for future career development. Any barriers to same within the workplace will be identified and removed, provided in doing so, same will not place the Company under a disproportionate burden.

8.4 Acquired disabilities in the course of work

8.4.1 An employee who acquires a disability in the course of their working life will be given the fullest support to maintain/return to a role appropriate to their experience, abilities and altered circumstances. In these circumstances, an employee would work directly with the Occupational Health team who can support to determine what accommodations they need to continue to perform their role.

Reasonable accommodations may include (but are not limited to); assistive technology, adjustments to the work environment, flexible working hours, induction, and training. Please see our Reasonable Accommodation policy for further details.

8.4.2 The integration of an employee returning to work after acquiring a disability, or being absent on long term illness, will focus on the abilities and requirements of the returning employee and the support of their line manager and work colleagues.

9. Implementation of this Policy

9.1 All employees have a role in ensuring that the provisions of this Policy are adhered to. It is the responsibility of all employees to make themselves familiar with this policy and related procedures and to treat their disabled colleagues with the same dignity and respect that should be properly afforded to everyone, at all levels in the organisation.

9.2 Special responsibility attaches to Managers and Supervisors to;

- Familiarise themselves with this Company policy;
- Uphold it as an integral part of their work;
- Be mindful of any additional needs expressed by employees with disabilities;
- Bring this policy to the attention of all employees;
- Intervene in any instance where discriminatory behaviour is observed or brought to their attention.

In this regard, HR Support Services (including Occupational Health and Support Services, Safety and Environment) will have a role in supporting this Disability Inclusion Policy, where appropriate, by providing to employees with disabilities:

- Counselling services to help them both adjust to their circumstances and contribute to their full potential as employees;
- Practical supports and facilitation in relation to work and other arrangements.

9.3 Employees with accessibility issues and/or reasonable accommodation queries/requests should connect with their line manager in the first instance who will then liaise with the HR Manager. The HR Manager will make the necessary referrals to the relevant area e.g. Occupational Health/Facilities.

9.4 If a manager becomes aware either formally/informally of a substantial impact on an employee's ability to do their role, the manager has an obligation to ascertain whether the individual requires support to enable them to be fully capable of performing their role to the required standard.

10. Raising matters of concern

10.1 Employees who believe that they have suffered any form of discrimination (or who wish to seek clarification on these issues) can get information from, or contact, any of the following people (who will assist the individual by referring to the appropriate agreed procedures):

- Your line manager or supervisor; or any manager/supervisor within your business unit
- A local HR manager
- A member of the Employee Relations team
- A Trade Union Representative
- The Company Occupational Health and Support Services.

10.2 If an employee is unable to resolve their grievances informally, a formal complaint may be lodged in writing with any manager. Enquiries and complaints will be dealt with seriously and promptly. Confidentiality and discretion will be observed insofar as it is practicable. All employees can contact, discuss and be represented by their Trade Union at all stages during the (complaint) process.

10.3 These procedures do not detract from an individual's rights under statutory legislation.

11. Support Services

11.1 The Occupational Health and Support Service is available to all employees with disabilities. It is designed to assist employees manage personal difficulties and aims to promote and maintain the wellbeing of employees. An Post also provides assistance by way of a confidential Employee Assistance Programme to support employees.

11.2 Communications & Training

An Post is committed to taking positive measures to increase awareness among employees about disabilities. This will be achieved by making this policy available to all employees and providing disability awareness training across all business units in the organisation.

11.3 External Supports

An Post will utilise employment based support programmes for people with disabilities and will identify, and where appropriate engage with, both government and non-government organisations to develop the Company's internal support strategy for disabled employees. All third parties and external agencies will be made aware of An Post's Disability Inclusion Policy. An Post will not engage the services of third parties that do not adhere to our Disability Inclusion Policy.

12. Review

12.1 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.



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