Disability Inclusion Toolkit

Catalyzing inclusion in the BFSI sector
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About Project SAMEIP
Project SAMEIP (SBI Foundation and Microsoft Employability Initiative for Persons with
Disabilities) is a pioneering collaborative initiative of SBI Foundation and Microsoft India, to
enable career pathways for underserved young Persons with Disabilities in the digitally
transformed BFSI sector. Envisioned to create an enabling ecosystem, this multi-year project
aims to influence the BFSI sector through an integrated model - F.A.T.E (Facilitation, Advocacy,
Training, Employment) to enable BFSI sector to adopt inclusion policies resulting in increased
hiring, retention and successful career opportunity for PwDs. Led by American India
Foundation, program is also partnering with Mahendra Skills, Team Lease Skills University,
v-shesh Learning Services and WinVinaya Foundation.

Disclaimer
This toolkit is intended to be a guide to understanding the process and steps to inclusion of persons with
disabilities in the workforce. Though every precaution has been taken to provide information in this
toolkit only as a guide to practicing inclusion of persons with disabilities in the workforce, the author and
publisher assume no responsibility for any errors or omissions. No liability is assumed for damages that
may result from the use of information contained within.
Message from

DINESH KHARA (Chairman, State Bank Group)

During the last two years, the world has been a witness to turbulent times with the Covid 19 pandemic impacting our lives in an unimaginable and unforeseen manner. The pandemic has brought into sharp focus the vulnerabilities that the Persons with Disabilities (PWDs) face in their day-to-day lives. One of the consequences of the pandemic has been that the livelihood opportunities have in general been impacted, as employers were forced to resize and downsize their workforce. This scenario is critical especially for PWDs who already face barriers and challenges in finding employment. It is, therefore, the right time for an affirmative action and making inclusion of PWDs in the workforce as the new imperative.

At State Bank of India, we have already experienced the social, moral, and economic benefits of inclusion. Now more than ever before, we need to make sure that the Persons with Disabilities are not excluded and get an equal and equitable chance to live their lives with dignity and economic independence.

Project SAMEIP which is a collaboration of SBI Foundation and Microsoft India, was designed to open more job opportunities in the BFSI and IT sectors for the young PWDs. Many of the young PWDs aspire to have a job in the financial services sector and with Project SAMEIP we endeavour to help them to realise their dreams.

The ‘Disability Inclusion Toolkit’ has been developed as policy guidelines for inclusion of PWDs in the BFSI sector and will serve as a reference guide for all the stakeholders, especially employers on their inclusion journey by providing practical inputs. This will be a ready reckoner both from a policy perspective as well as for institutionalizing the initiative of hiring and retaining PWDs. I am confident that this manual will encourage many to take the first steps to hire PWDs and for those who are already hiring them, this manual will help to ensure that they are fully integrated into the organisation and rise to their full potential.

I wish all the best in your journey of making your organisation a disability inclusive one.

With best wishes,

Dinesh Khara
Chairman
State Bank Group
Message from
REKHA TALLURI (Chief Financial Officer, Microsoft India)

As we navigate our new hybrid reality, it is important to reflect on the severe impact of the recent past. One of the key lessons to be learnt here is the interdependence of humanity and the need for cooperation. In moments of crises, it is always vulnerable sections of society, such as persons with disabilities (PwDs), who are affected and excluded in multiple ways.

Microsoft’s mission is to empower every person and every organization on the planet to achieve more. To bring our mission to fruition, we always ask ourselves: what we can do to create impact. One of the answers we keep coming back to is collaboration among like-minded partners, as this is the key to achieve inclusive and equitable growth. And that’s how the collaboration between SBI Foundation and Microsoft India – Project SAMEIP – was conceptualised. At its core, the program equips underserved PwD youth in the BFSI sector and BFSI verticals in the IT sector with technology and skills for jobs. The larger goal of such an association between two industry leaders is to encourage more collaborations with government organizations, industry skilling bodies and non-profits. Combined with cross-industry advocacy, we hope this will inevitably result in increased hiring of persons with disabilities.

Today, people with disabilities at the unfavorable end of a widening gap in societal inclusion. Technology plays a huge part in building a better, more accessible, inclusive, and sustainable world. By sharing resources and collaborating with each other, we can accelerate growth. We have the opportunity to collaborate and learn from each other as we accelerate our hiring of PwD candidates and create a more inclusive society.

Project SAMEIP has embraced an integrated approach of working with the private sector. The initiative enables the BFSI ecosystem while leveraging the industry influence of SBI and Microsoft, to ensure demand is created for PwD employees. To further encourage more corporates to hire PwD candidates, we have complied a Disability Toolkit. The Handbook on Disability Inclusion is a detailed compendium of the legal requirements and best practices to seamlessly integrate PwDs into the organization so they can achieve their true potential. It can especially be beneficial to corporates new to hiring of PwDs as it provides insights on sensitive language as well as overall knowledge on accessibility at the workplace. The handbook will further help in the mainstreaming the hiring of PwDs and ensure every person’s right to work, earn a living and live a life of dignity.

It gives me great satisfaction to have been involved with this initiative and I am confident that such collaborative efforts are the way forward to create a larger circle of impact. I hope that all organizations looking to have a diverse and inclusive workforce and building a culture of empathy and inclusion find this handbook useful. Together we can achieve more.
CONTENTS

Section 1. Introduction
   a. Purpose
   b. How to use this Toolkit

Section 2. Planning an Inclusive Workplace
   a. What does the law say?
   b. What is an Inclusive Workplace?
   c. Business case for inclusion
   d. How can you do it – Taking first steps

Section 3. Making the Built environment accessible
   a. What does the law say?
   b. Parking / Drop off
   c. Entrance / doors
   d. Reception
   e. Public toilets - male, female & Unisex
   f. Amenities - Drinking Water / Coffee
   g. Level changes
   h. Signage and Contrast
   i. Controls
   j. Workplace
   k. Common Areas Amenities & Services
   l. Tips & Good Practices

Section 4. Making virtual environment accessible & Access to ICT
   a. Websites
   b. Communications
   c. Documents
   d. Software
   e. Tips & Good practices
Section 5. Adopting Inclusive Policies in the company

- a. What does the law say?
- b. Beneficial Govt. schemes to support inclusion (for private establishments)
- c. Equal opportunity Policy
- d. Liaison cum Inclusion Officer
- e. Grievance Redressal
  - I. List of positions for persons with disabilities
  - II. Recruitment
  - III. Selection Process
  - IV. Interview process & protocols
  - V. Job rotation & transfers
  - VI. Appraisal & career progression
  - VII. Employee engagement etc.
  - VIII. Leave & Absence
  - IX. Return to work
- g. Social protection on acquiring disability
- h. Vendor policies
- i. Tips & Good Practices

Section 6. Facilitating enabling environment through Reasonable Accommodation

- a. What does the law say?
- b. Reasonable Accommodation Process
- c. Reasonable Accommodation for diverse needs
- d. Provision of Assistive Devices and Equipment
- e. Accessible Transportation
- f. Quiet Rooms
- g. Tips & Good practices

Section 7. Awareness and Safety

- a. What does the law say?
- b. Disability Etiquettes & Gender sensitization
- c. Rights and Duties of Employees
- d. Rights and Duties of Employers
- e. Emergency & Evacuation Protocols
- f. Medical/Rehabilitation Professional at call
- g. Tips & Good Practices
Section 8.

Annexures:

a. Sample Template of Equal Opportunity Policy for Govt. Establishment
b. Sample Template of Equal Opportunity Policy for Private Establishment
c. Workplace Inclusion Checklist

References

a. What does the law say?
b. Disability Etiquettes & Gender sensitization
c. Rights and Duties of Employees
d. Rights and Duties of Employers
e. Emergency & Evacuation Protocols
f. Medical/Rehabilitation Professional at call
g. Tips & Good Practices
Indian BFSI sector has the potential to gain from employing persons with disabilities which is still a relatively untapped talent pool. With a little investment and policy improvements, this section of the workforce can be fully integrated and can bring the benefits to employers and be a productive member of the workforce contributing to the bottom line.

The process of workplace inclusion requires a systemic change as there are many players involved to make it happen. It requires a commitment from the top management and wide consultation with the staff and managers before beginning to attempt this. Disability inclusion is also a legal mandate under the Rights of Persons with Disabilities (RPWD) Act, 2016 and sets out duties of private and govt establishments. Accessibility of buildings, information and communication technology, services, non-discrimination, equal opportunity policies in both private and govt establishments and reservation in jobs in govt. establishments are some major mandates under the RPWD Act.

An important area that remains neglected/ignored in India is of ‘reasonable accommodation’ at the workplace. The BFSI sector has employed a large number of persons with disabilities who are majorly in the govt. establishments and there is a scope to enhance this number even further both in the public sector and in the private sector establishments.

The present toolkit is under the framework of Project SAMEIP¹, a collaborative partnership between SBI Foundation and Microsoft India to increase pathways for young persons with disabilities (PwDs) in the BFSI Sector. The American India Foundation is the coordinating NGO with four training partners implementing the project. The toolkit aims to provide guidance to all BFSI sector players on how to practice disability inclusion and benefit from the unique talent and expertise of this untapped workforce.

The toolkit follows a unique pattern of providing ‘what the law says’ in each section to make the establishments aware of the legal provisions - both in the Act and the Rules made thereunder and other govt policies. It dwells deeper into what is an inclusive workplace, accessibility of built environment, virtual environment, adopting inclusive policies and practices, what may constitute reasonable accommodation, raising awareness on disability equity and safety.

The toolkit has not dealt with the issue of reservation in jobs for persons with disabilities and mechanisms around it which are largely applicable to government establishments, as sufficient guidance is available in the form of DoPT memorandums on the subject.

The tool kit also provides templates of equal opportunity policies for private establishments and government establishments. These policies are required to be framed and registered with the Office of the Chief Commissioner/ State Commissioners for persons with Disabilities depending on under whose jurisdiction the establishment falls as mandated by section 20 of the RPWD Act.

We hope this toolkit will be helpful to the BFSI sector establishments in practicing disability inclusion at workplace.

Best wishes on your journey to disability inclusion at workplace.

Subhash Chandra Vashisht
Advocate, Specialist- Accessibility, Universal Design & Diversity Inclusion

¹Project SAMEIP, a collaborative initiative of SBI Foundation and Microsoft India is being implemented by AIF and four other 1 NGO partners. The project aims to skill and place Person with Disabilities (PwDs) candidates in the BFSI sector.
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<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
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<tr>
<td>ADS</td>
<td>Accessible Document Specialist</td>
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<tr>
<td>BFSI</td>
<td>Banking, Financial Services and Insurance</td>
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<td>CPACC</td>
<td>Certified Professional in Accessibility Core Competencies</td>
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<td>CPWA</td>
<td>Certified Professional in Web Accessibility</td>
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<tr>
<td>DEPwD</td>
<td>Department of Empowerment of Persons with Disabilities</td>
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<td>DEOC</td>
<td>Diversity and Equal Opportunity Centre</td>
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<td>Dhub</td>
<td>Disability Hub</td>
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<tr>
<td>DoPT</td>
<td>Department of Personnel and Training, Govt of India</td>
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<td>DPI</td>
<td>Dots Per Inch</td>
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<td>DPO</td>
<td>Disabled People's Organisations</td>
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<td>EOP</td>
<td>Equal Opportunity Policy</td>
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<td>ePUB</td>
<td>Electronic Publication</td>
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<td>EPF</td>
<td>Employees' Provident Fund</td>
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<td>EPFO</td>
<td>Employees' Provident Fund Organisation</td>
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<td>Employees' State Insurance Corporation</td>
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<td>G3ict</td>
<td>Global Initiative for Inclusive ICTs</td>
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<td>GiGW</td>
<td>Guidelines for Indian Government Websites</td>
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<td>HR</td>
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<td>IT</td>
<td>Information Technology</td>
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<td>ICT</td>
<td>Information and Communication Technologies</td>
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<td>ILO</td>
<td>International Labour Organisation</td>
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<td>NGO</td>
<td>Non Government Organisation</td>
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<td>OCR</td>
<td>Optical Character Reader</td>
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<td>PDF</td>
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<td>PwD/ PwDs</td>
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<td>RPWDAc</td>
<td>Rights of Persons with Disabilities Act 2016</td>
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<td>UN</td>
<td>United Nations</td>
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<td>UNCRPD</td>
<td>United Nations Convention on Rights of Persons with Disabilities</td>
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<td>UNDESA</td>
<td>United Nations Department of Economic and Social Affairs</td>
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<td>WAS</td>
<td>Web Accessibility Specialist</td>
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<td>WHO</td>
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Section 1

Did you know

Did you know that PwDs comprise less than 0.5% of the total staff in India’s top firms?
Introduction

Disability Inclusion refers to the meaningful participation of persons with disabilities in all their diversity, the promotion of their rights and the consideration of disability-related perspectives, in compliance with the UN Convention on the Rights of Persons with Disabilities (United Nations Disability Inclusion Strategy, 2019)\(^1\).

One billion people, nearly 15 percent of the world’s population, experience some form of disability. One-fifth of the estimated global total, encounter significant disabilities. Persons with disabilities on average as a group are more likely to experience adverse socio-economic outcomes than persons without disabilities, such as less education, worse health outcomes, less employment, and higher poverty rates. (The World Bank, 2013)\(^3\)

This is also well known that for empowerment of the persons with disabilities, access to education and sustainable livelihood is extremely important. In Indian context, the range of \(2.21\%\) (Census 2011) and \(15\%\) (WHO, WB 2011) of the total population translates into a range between 26.8 million – 181.9 million persons with disabilities. Census 2011 highlighted that only 36\% of the total persons with disabilities are employed.\(^4\)

As per an ILO report\(^5\), 73.6\% of the persons with disabilities in India are still outside the labour force. Of these, those with psycho-social disabilities, women with disabilities and those in rural areas are the most neglected. Every day they face challenges that hamper their ability to contribute equally to the life of our societies. This is not only a violation of their rights but a loss for our society and its diversity\(^6\) (Miroslav Lajčák, 2017). It also has a negative effect on the economy considering the value these people could generate if employed.

Government of India envisions an inclusive society in which equal opportunities and access is provided for the growth and development of persons with disabilities to lead productive, safe and dignified lives. This is possible only when persons with disabilities have suitable job opportunities, with defined career paths.

In a recent judgement\(^7\), the Supreme Court of India held that disability is inherent to human diversity, and therefore not to be viewed as aberration. Highlighting how society is also at loss by denying equal opportunities to persons with disabilities to grow, the Court observed, “When competent persons with disabilities are unable to realize their full potential due to the barriers posed in their path, our society suffers, as much, if not more, as do the disabled people involved. In their blooming and blossoming, we all bloom and blossom. The most significant loser as a consequence of the UPSC’s rigid approach in this case (of refusing to provide scribes to those not having benchmark disabilities) is the UPSC itself. For it is denying to the nation the opportunity to be served by highly competent people who claim nothing but access to equal opportunity and a barrier-free environment.”

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\(^5\)Miroslav Lajčák, President of the UN General Assembly at the 72nd Session of the UN General Assembly, in International Day of Persons with Disabilities 2017

There is also lack of awareness among employers how they can practice disability inclusion; what are the legal obligations of employers?; what is reasonable accommodation?; what sensitization trainings are needed to enhance acceptance of diversity at workplace?; what kind of technology is needed to implement inclusion?; what are the specific needs of people with different disabilities?; how much will disability inclusion cost?; where do we find qualified employees with disabilities?; how can we benefit from diversity inclusion?; how to implement inclusion in my company?, etc.

On the other hand, persons with disabilities also face many challenges while trying to gain necessary skills, to find employment and at the workplace. Some crucial challenges among them are:

- Limited participation in the labour workforce by persons with disabilities.
- Various physical, transportation, information, communication and attitudinal barriers faced by persons with disabilities in entering the job market.
- Misconceptions about persons with disabilities at the workplace.
- Discrimination and unconscious bias towards persons with disabilities at workplace.

Hence, a need was felt to fill this huge information gap and to equip the employers in BFSI sector with necessary guidance so that they can benefit from the huge and largely untapped pool of talent - persons with disabilities.

1a. Purpose

Project SAMEIP, a collaborative initiative of SBI Foundation and Microsoft India is being implemented by American India Foundation and four other NGO partners. The project aims to skill and place Person with Disabilities (PwDs) candidates in the BFSI sector. As a part of this project, this toolkit is designed as a reference guide for all stakeholders, especially the employers, to guide them on their inclusion journey from a policy perspective and for institutionalizing it through the initiatives of recruiting and retaining persons with disabilities. It will be useful for human resources professionals and senior management with responsibility for people management, recruitment, training and development.

It will also be valuable for use at a strategic level, when planning organization's key priorities and objectives.

1b. How to use the toolkit?

The toolkit contains a range of practical ideas to help establishments create accessible and inclusive work environments for employees with disabilities. When you want to know what is expected of your establishment under the law, please visit the concerned section to read the legal provisions under the RPWD Act, 2016 and Rules made there under.

<table>
<thead>
<tr>
<th>What does the law say on the subject?</th>
<th>Visit the concerned section</th>
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<tr>
<td>How to analyze your establishment’s base line; how to create systems and prepare the team for implementing the inclusion plan.</td>
<td>Section 2</td>
</tr>
<tr>
<td>Guidance on accessibility requirements of physical environment</td>
<td>Section 3</td>
</tr>
<tr>
<td>Guidance on accessibility requirements of information and communication technology</td>
<td>Section 4</td>
</tr>
<tr>
<td>What is reasonable accommodation and how can you provide it at various stages of employment</td>
<td>Section 6</td>
</tr>
<tr>
<td>Guidance on raising the awareness of staff, learning disability etiquettes, use of right language, rights and duties of employers and employees with disabilities etc.</td>
<td>Section 7</td>
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<tr>
<td>Templates of Equal Opportunity Policies for private and government establishment and its registration with Commissioner for Persons with Disabilities.</td>
<td>Annexure</td>
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**Rights of Persons with Disabilities Act, 2016**

The RPWD Act was passed to implement the UN Convention on the Rights of Persons with Disabilities which lays down the following principles for empowerment of persons with disabilities —

(a) respect for inherent dignity, individual autonomy including the freedom to make one’s own choices, and independence of persons;

(b) non-discrimination;

(c) full and effective participation and inclusion in society;

(d) respect for difference and acceptance of persons with disabilities as part of human diversity and humanity;

(e) equality of opportunity;

(f) accessibility;

(g) equality between men and women;

(h) respect for the evolving capacities of children with disabilities and respect for the right of children with disabilities to preserve their identities;
The RPWD Act, 2016 defines three disability types under the Act, namely

I. "person with disability" means a person with long term physical, mental, intellectual or sensory impairment which, in interaction with barriers, hinders his full and effective participation in society equally with others;

ii. "person with benchmark disability" means a person with not less than forty percent of a specified disability where specified disability has not been defined in measurable terms and includes a person with disability where specified disability has been defined in measurable terms, as certified by the certifying authority;

iii. "person with disability having high support needs" means a person with benchmark disability, who needs high support.

The Act promotes values of inclusion, tolerance, empathy and respect for diversity in all spheres of human lives. Thus, the inclusion of persons with disabilities at workplace is beneficial for the employers not only because it is in compliance with the law but employers also gain from the richness the diversity brings to the business. The benefits of inclusion can spread beyond the walls of an organization. Many people spend more waking hours at work than at home and getting relationships right in the workplace is a way to start getting those relationships right in the wider society. Incorporating inclusion into the key values of the organization can therefore have a three-fold effect: good for your business, good for your workforce, and good for the community around you. Most importantly, by adopting inclusion, the establishments can gain from tangible benefits that are not only good for business but are a win–win for all.
Section 2

Did you know

Did you know in Nagaland 51.92% of the PwD population is employed while the All India figure is 36.34% only
2. Planning an Inclusive Workplace

2a. What does the law say?

RPWD Act, 2016

Section 3. Equality and non-discrimination.
(1) The appropriate Government shall ensure that the persons with disabilities enjoy the right to equality, life with dignity and respect for his or her integrity equally with others.
(2) The appropriate Government shall take steps to utilize the capacity of persons with disabilities by providing appropriate environment.
(3) No person with disability shall be discriminated on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.
(4) No person shall be deprived of his or her personal liberty only on the ground of disability.
(5) The appropriate Government shall take necessary steps to ensure reasonable accommodation for persons with disabilities.

Section 20. Non-discrimination in employment.
(1) No Government establishment shall discriminate against any person with disability in any matter relating to employment: Provided that the appropriate Government may, having regard to the type of work carried on in any establishment, by notification and subject to such conditions, if any, exempt any establishment from the provisions of this section.
(2) Every Government establishment shall provide reasonable accommodation and appropriate barrier free and conducive environment to employees with disability.
(3) No promotion shall be denied to a person merely on the ground of disability.
(4) No Government establishment shall dispense with or reduce in rank, an employee who acquires a disability during his or her service: Provided that, if an employee after acquiring disability is not suitable for the post he was holding, shall be shifted to some other post with the same pay scale and service benefits; Provided further that if it is not possible to adjust the employee against any post, he may be kept on a supernumerary post until a suitable post is available or he attains the age of superannuation, whichever is earlier.
(5) The appropriate Government may frame policies for posting and transfer of employees with disabilities.

Section 21. Equal Opportunity Policy.
- Similarly requires all the establishments to notify an equal opportunity policy detailing measures proposed to be taken by it in pursuance of the provisions of the said Chapter to promote inclusion of employees with disabilities. The RPWD Act also defines the term 'establishment' in section 2(i) to include a Government establishment and Private establishment. It further defines the two type of establishments in Section 2(k) and 2(v) respectively as below:-

"Government establishment" means a corporation established by or under a Central Act or State Act or an authority or a body owned or controlled or aided by the Government or a local authority or a Government company as defined in section 2 of the Companies Act, 2013 and includes a Department of the Government;

"Private establishment" means a company, firm, cooperative or other society, associations, trust, agency, institution, organization, union, factory or such other establishment as the appropriate Government may, by notification, specify; Thus, it would be relevant to note here that many provisions of the RPWD Act are applicable to all establishment. The provisions are more stringent and detailed out for private organization employing 20 or more employees in terms of RPWD Rules 2017.
2b. What is an inclusive workplace?
An inclusive workplace is one where the human rights principles of fairness, respect, equality, dignity and autonomy are promoted and are part of the organization’s goals and objectives. In such a workplace everyone is treated with respect and all employees are valued for their contributions. In an inclusive workplace, colleagues and clients are treated with dignity, respect, and equality, and these values are reflected in the organization’s mission and vision. Policies and procedures are implemented and managed so that employees’ rights are protected and they are treated both equally and equitably.

Box 1: Key drivers for the employment of people with disabilities (ILO, 2014)\(^9\)
When companies are asked what led them to promote the employment of people with disabilities, a number of, similar reasons are often mentioned. The most frequent ones are:

- Corporate Social Responsibility. Initiatives on disability inclusion, and projects related to people with disabilities, although still largely absent in CSR, are increasingly mentioned in companies’ annual CSR reports.

- Personal commitment from the founder or CEO of the company. This is quite often the case and raises the prevalent issue of long-lasting commitment by the company.

- Financial incentives. This is usually an interesting incentive for small and medium enterprises. Grants to compensate for expenses linked to reasonable accommodation are particularly important to ensure that these expenses do not lead to candidates with disabilities not being employed.

- Pressure from society. As more companies (and organisations in general) become more disability-inclusive, the level of societal pressure put on other companies increases. The work of DPOs as well as of NGOs advocating for people with disabilities can play an instrumental role in increasing this pressure.

- Legislation. As this is usually the most relevant initial driver, the following paragraphs address this in some more detail.

The senior management of such an organization fully supports inclusion policies and these are communicated to employees at all levels of the organization. In an inclusive workplace, all employees are encouraged, and given the tools and supports needed, to develop and advance in their careers. When employees with disabilities face barriers to their career advancement, the organization takes specific actions to remove these barriers. These barriers could be in any form such as biased attitudes of seniors or colleagues, the opportunity for exposure to jobs that are essential for advancement or simply lack of reasonable accommodation etc.

In an inclusive workplace -

- Policies are in place concerning equality and human rights, working conditions, dignity at work, employee welfare and inclusive recruitment and procurement practices.
- Employees at all levels are aware of the inclusive values of the organization and are actively consulted and involved in policy development.
- The workforce is representative of the persons with diverse disabilities and genders.
- Unnecessary compartmentalization and occupational segregation, where groups of employees are congregated into certain areas based on their disabilities, are discouraged.
- The organization is aware of any potential tensions within the workplace, and takes action to anticipate and address them.
- Inclusive strategies are fully supported and promoted by senior management.
- Universal Design principles guide in designing services, built environment, facilities, virtual environment, ICT and products.
2c. Business case for inclusion

A strong business case exists for creating accessible and inclusive work environments for employees with disabilities. The full inclusion of persons with disabilities in all aspects of community life and the workplace opens the door to their full participation in the economy as customers, entrepreneurs, and employees. The business case basically states that hiring workers with disabilities can positively impact a company’s bottom line (Debra A. Perry, ILO 2007). Here’s why:

- People with disabilities make good, dependable employees. Employers of disabled workers consistently report that, as a group, people with disabilities perform on par or better than their non-disabled peers on measures such as productivity, safety and attendance.

- People with disabilities are more likely to stay on the job. The costs of job turnover, such as lost productivity and expenses related to recruitment and training, are well known to most employers.

- Hiring people with disabilities increases workforce morale. Many employers report that teamwork and morale improves when disabled workers become part of the staff.

- People with disabilities are an untapped resource of skills and talents. In many countries, people with disabilities have skills that businesses need, both technical job skills and transferable problem-solving skills developed in daily life.

- People with disabilities represent an overlooked and multibillion-dollar market segment. That market is disabled persons and their families and friends. Ignoring this market may mean losing not only the disabled consumer but his or her family and friends. As the population ages, so does the incidence of disability. It makes sense to have employees who know first-hand about the product and service needs of this consumer segment.

Korn Ferry (2008) stresses that if we want the employment of persons with disability to become a norm in companies, hiring has to be done not out of sympathy or empathy, but because it makes business sense.

A white paper in 2015 brought out how little investment on disability inclusion at workplace positively impacted the businesses on three fronts i.e. impact on bottom line, customer satisfaction and brand image of an inclusive enterprise.

A study published by Accenture in 2018 analyses the correlation between the financial performance of organizations and the number of employees with disabilities in their workforces. The results show that companies employing persons with disabilities are above average in terms of profitability (revenues and net income) and value creation (economic profit margin).

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### Positive impact on revenues / margins

1. Higher productivity of PwDs in repetitive tasks (8-10% higher productivity established in several roles in manufacturing, hospitality, BPOs)

2. Lower attrition rate (~5% lower than regular employees)

3. Reduced absenteeism

### Investments and efforts required

1. Workplace modifications in existing set-ups, (part of design in case of new facilities)

2. Recruitment, training and on-boarding programs

3. Sensitization drive (part of internal communication)

### Impact on business

1. Bottom Line Impact (2.5% driven by increased productivity and reduced attrition)

2. Higher Customer Satisfaction levels

3. Brand image of an inclusive enterprise with positive spin-off for all stakeholders

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**Business Case of Disability Inclusion at Workplace**

The inclusion for people with disabilities at workplace cannot be implemented on humanitarian equity alone or as a corporate social responsibility project and therefore, must anchor in the strong business case leveraging their abilities. More employers are coming up with solutions to create and promote an inclusive workplace in order to maximize productivity, attract new talent, increase employee commitment and create wider customer appeal. An organizations’ action on inclusion of persons with disabilities can have a significant positive impact on their brand reputation. Hence, inclusion does make a good business sense.
2d. Pre-requisites for implementing inclusion
Learnings and experience from several studies indicates that for successful creation of inclusive workplace, the following four pre-requisites are needed:

- **Commitment of Senior Leadership**
  Changing an organization’s culture requires a sustained effort by senior leaders who are seen to be committed to the change. They must communicate a convincing business need for creating a culture of inclusion for employees with disabilities. The top leadership should exhibit the inclusive behaviors they want to see throughout the organization.

- **Have Diversity and inclusion champions**
  Champions lead change. Organizations with good practices for hiring and developing people with disabilities invariably use champions to carry the message of inclusion. These champions can come from all levels in the organization—including senior leadership. Their goal is to help create a work culture that focuses on the abilities of all employees—not on their disabilities.

- **Create long-term and sustainable plan for inclusion**
  A vision is an excellent starting point when creating more inclusive and accessible workplaces. For sustainable change to occur, the vision needs to be integrated into everyday processes and practices.

- **Adopt Enabling policies and practices**
  The policies and practices across the organization need to integrate how it will ensure inclusion to be practiced and implemented.
2e. Taking the first steps
This section offers step-by-step measures you can take to make your workplace more inclusive. This process can be divided into five stages or steps:  

**STEP 1**
Consider what you want to achieve and what the benefits will be.

**STEP 2**
Undertake an inclusion review of your workplace.

**STEP 3**
Decide where work is needed and create an action plan.

**STEP 4**
Communicate the plan with staff and put the plan into action.

**STEP 5**
Review, monitor and evaluate the plan’s impact and use what you find to plan future action.

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Step 1. Consider what you want to achieve and what the benefits will be
This first stage of the process involves examining your establishment: its size, the type of work carried on, its location, who it employs, who uses its services, who are its vendors and what its goals are; and thinking about how it could become more inclusive. Remember to factor in particular characteristics and business needs that your establishment may have as well as compliance requirements with various laws, standards etc.

Step 2. Undertake an inclusion review of the workplace
This process involves reviewing the demographics in the establishment; formal policies and procedures; informal or unwritten working practices and the staff consultation and participation mechanisms.

2.1 Demographics
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2.2 Formal policies and procedures
These can tell you a lot about how much you have previously thought about equality and diversity inclusion. As a part of reviewing these policies, you should critically look at:-

i. Policies on non-discrimination
Do you have clear and well-known policies that set out the behaviour you expect in the workplace in compliance of the RPWD Act and other laws? Are liaison officers clear about these policies and trained to act quickly when dealing with issues?

ii. Disciplinary and grievance procedures
Do you have clear instructions on disciplinary and grievance redressal procedures? Are they accessible to employees and easily understood? Have you appointed Grievance redressal Officer?

iii. Policies on reasonable accommodation & flexible work.
Do you have policies and procedures in place for dealing with requests to work flexibly, process for seeking reasonable accommodations etc. and are employees aware of these?

iv. Absence policies for health & rehabilitation
Do you have a clear policy on absence of employees for health or rehabilitation related needs?

v. Health and safety policies
Do you have clear policies in place on health and safety, with regular risk assessment and ergonomic checks to promote staff health and wellbeing? For example, for pregnant women, employees with disabilities etc.?

vi. Appraisal and Performance management procedures
Do you have clearly set out procedures on appraisals and performance management that take individual needs and abilities into account, and are objective and transparent to all employees?
vii. Equal pay policies
Are your policies on pay clearly articulated, based on objective criteria and easily understood by employees? Are there any pay differentials on the basis of disability or gender?

viii. Recruitment and promotion procedures
Are your procedures for recruitment and promotion transparent and equally accessible to all applicants including those with disabilities and provide for robust mechanism to seek and avail reasonable accommodation where needed?

ix. Policies on training and development
Do you have procedures that ensure that all employees irrespective of disabilities have equal access to development and work-related training? Are employees trained and sensitized regularly on disability equity? Are your training processes, technology and equipment accessible to employees with disabilities?

x. Procurement policies
To strengthen your commitment to inclusive working, do potential suppliers need to provide evidence in their tenders that they promote disability inclusion? Do you keep accessibility in mind while procuring or upgrading technology, equipment and inventories for the establishment?

Service provision and customer equality policies
If you are a service provider, do you have a strategy in place to make sure that all customers are treated equally and without discrimination? Are your services and infrastructure accessible?

2.3 Informal or unwritten working practices
Examining informal working culture can be difficult to do, but the aim should be to find out if there are gaps between what is written in your policies and everyday working practices within the establishment. Some areas to be considered are:-

i. Staff attitudes and behaviour
Is there an open and understanding working culture where everyone is treated with dignity and respect? Is staff aware of the importance of equality, inclusion and non-discrimination policies?

ii. Usage of employee provisions
How often employees with disabilities use the provisions made for them such as flexible working, visit the therapist or doctor or some specific accommodations?

iii. Working patterns and segregation
Do staff with diverse backgrounds and from different groups work together in teams and divisions? Or the similar groups of staff clustered into the same teams, shifts and areas of work?

iv. Team Building Activities
Are any activities in place to bring staff together and to promote inclusion and understanding? Do these activities take into account the access requirements of diverse team members?

v. Recruitment and retention
Do some groups remain at the bottom of the career ladder despite inclusive policies on recruitment and? It means that workplace culture is creating barriers for some and need improvement.
2.4 Staff Consultation and Participation Mechanisms

Finally, are there established procedures through which staff can communicate with senior management? Are staff and their representatives consulted on changes to policies and practices that will affect their working lives? Are they actively involved in initiatives to improve work culture? In order to create a work culture of inclusion, respect and opportunity for all, it is essential that everyone in the establishment, from senior management to the most junior staff, is engaged with and involved in the process of creating this culture, and feels that their opinions and experiences are valued.

Measures to promote inclusive working need to be thought of positively among employees, not as something that is 'done' to them as a benevolent action. If this is not the case, it is more likely that your efforts to create inclusive working will not succeed, because employees may feel that measures are being forced upon them. Participation mechanisms may include, staff surveys, focus group interactions and engaging with informal or formal associations of staff, if existing.

Step 3. Decide where intervention is needed and create an action plan

Having reviewed your workplace in terms of equality and disability inclusion, the next stage is to decide upon the action you will take. The action plan should be a dynamic document, capable of being adapted and developed over time. It should set out the key changes you would like to make as a result of your review. Prioritize these changes to help you decide where to start. Some measures you may need to consider as part of your action plan are:

3.1 Actively involve all employees in the action plan
- Consultation and participation while creating the plan.
- Encourage employees to take part in monitoring, and promote the reasons for doing so.
- Make enabling adjustments to include employees with disabilities.

3.2 Build a culture of inclusion and respect
- Ensure the organization’s core values include a commitment to equality, human rights and inclusive working.
- Create, extend or improve policies on equality and inclusion and make sure other policies are equality reflective of the same.
- Take immediate action to address and tackle discrimination or harassment.
- Train all staff member on inclusive working and disability equality.
- Make inclusion a key management approach.
- Encourage and appoint equality and inclusion champions or Role models.
- Encourage employee networks and forums.
- Promote culture-changing initiatives
3.3 Take an inclusive approach to recruitment, promotion and development
- Make equality, diversity and inclusive working part of job descriptions.
- Monitor applicants and staff at different levels within the establishment.
- Disability sensitization training for all staff involved in recruitment and a fair and transparent selection process.
- Have staff with disabilities on interview panel.
- Reward talent and achievement than stereotypical indicators of success.
- Value skills achieved outside the workplace.
- Encourage and enable development for all.
- Offer mentoring opportunities to junior and new staff.

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3.4 Encourage engagement with the local community
- Employer assisted volunteering through CSR initiatives.
- Reach out and create network with NGOs, DPOs, Self-help groups working with persons with disabilities to source potential employees with disabilities with required skills.

**Step 4. Communicate the plan with staff and put the plan into action**

Once the action plan has been developed in consultation with employees, it is time to put the plan into action and to make sure that everyone in the establishment is aware of it. How you choose to do this will depend on the size and nature of your establishment, but establishments may consider the following:

**4.1 Implementing the plan**

For each measure you want to put in place, and each change you want to make as part of your action plan for disability inclusion, it is useful to spend some time thinking about what the outcome of that action will be, how will it be funded if it requires finances, how you will measure the impact of the action, and what will be the timelines for implementation and review. You may set up regular reviews so that you can assess the progress that is being made and provide updates to your employees.
4.2 Communicating the plan
There are several ways that you could let employees know more about your inclusion action plan and its implementation. Some possible options are:

- Arrange launch events or seminars for the action plan, to which all employees are invited.
- Promote new inclusion policies and make sure they are accessible to all employees.
- Create an equality or inclusion section of your staff intranet, where the plan can be viewed.
- Disseminate information on the plan in accessible and alternate formats and seek support.

Step 5. Review, monitor and evaluate the plan's impact and plan future action
It is important to regularly monitor, evaluate and review any action taken in pursuance of workplace inclusion, in order to assess what is working well, what needs more attention, and anything that has been missed. This helps in measuring the plan achievements and document the good practice which could be used as learnings for future initiatives. During the monitoring and evaluation phase, the data should be collected and evaluated on a regular basis, and employees updated and consulted regularly. The first review could work as a baseline for subsequent reviews and to see how far the plan has been successful. Consider the following during review, monitoring and evaluation:

5.1 Consult the Staff
Go back and repeat the consultation with the staff that was done before creating the action plan. What has changed as per the staff? What is still to be done? What are the current understanding on disability equity and the need to build inclusive culture?

5.2 Review policies
Revisit the policies once again to measure what has changed since you implemented the inclusion action plan. What is the awareness level among the staff about these policies? Are staff with disabilities able to derive inclusion benefits using these policies? Is there a further need to change or improve?

5.3 What does the monitoring data reveal?
Does the data reveal the findings that you wanted as a result of the inclusion plan? What action has been taken on the findings? The monitoring of success of inclusion action plan on an annual basis will help in taking prompt action towards success of the plan.

5.4 Benchmark
Compare yourself against prevailing best practice in your sector. Larger establishments could consider setting up internal benchmarks, so that different branches or units could learn from each other while working to achieve same targets.
3. Making the Built environment accessible

This section outlines the importance of accessibility in built environment as a pre-condition to practice disability inclusion. Establishments should ensure that their physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards given in the Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016\(^6\) and the National Building Code, 2016 (as updated from time to time) to ensure barrier free accessibility.

In fact, for all new buildings, accessibility should be considered at the design stage itself to ensure seamless accessibility and to avoid cumbersome and costly retrofitting later. For existing buildings, the establishments should get their premises audited from access auditors to get a basic assessment of accessibility. It is also important to engage with employees with disabilities while taking initiatives to enhance accessibility. Very often establishment do not consider persons with disabilities for emergency or disaster preparedness and workplace safety. In this regard, the protocols of the National Disaster Management Authority of India\(^6\) need to be followed scrupulously. India is a signatory to Sendai Framework for Disaster Risk Reduction 2015-2030\(^1\) adopted at the United Nations General Assembly.

The establishment should aim to revamp their existing buildings by March 2022, to ensure strict compliance with the Standards. Any new facility that is built or renovated or leased or rented shall be evaluated for compliance with accessibility Standards at different stages of the building construction. Any employee facing accessibility issues should report to the facilities team at their location or write to the Liaison cum Inclusion Officer. The grievance may be escalated with Grievance Redressal Officer, if the same is not resolved.

3a. What does the law say?

RPWD Act, 2016

44. Mandatory observance of accessibility norms?

(1) No establishment shall be granted permission to build any structure if the building plan does not adhere to the rules formulated by the Central Government under section 40.

(2) No establishment shall be issued a certificate of completion or allowed to take occupation of a building unless it has adhered to the rules formulated by the Central Government.

45. Time limit for making existing Infrastructure and premises accessible and action for that purpose. - All existing public buildings shall be made accessible in accordance with the rules formulated by the Central Government within a period not exceeding five years from the date of notification of such rules.

RPWD Rules, 2017

15. Rules for Accessibility. - (1) Every establishment shall comply with the following standards relating to physical environment, transport and information and communication technology, namely:- (a) Standard for public buildings as specified in the Harmonised Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons as issued by the Government of India, Ministry of Urban Development in March, 2016.


3b. Parking/Drop off
Wherever parking for vehicles has been provided, Reserved parking spaces for vehicles carrying persons with disabilities should be provided, indicated by the international sign of accessibility. Accessible parking spaces which should be located on the shortest accessible route into the office building or facility, and should be roofed wherever possible. Parking and drop off areas should have enough clear space around them so that disabled persons can get into and out of a car /vehicle. Access route from parking lots to the building entrance should be level, firm, sufficiently wide and accessible by wheelchair users. Accessible Parking spaces should also consider wheelchair charging facilities to electric vehicles and wheelchairs.

Entrance/doors
Entrances and doors should be clearly marked and be wide enough for wheelchair users and other disabilities with clear door width of 900 mm. Space to maneuver should be provided in front of doors, including sufficient space for moving past door handles. Thresholds of doorways should not exceed 10 mm. Raised threshold and floor level changes at doorways should be levelled off with a slope on each side of a threshold. The slope may be a simple, movable ramp. Handles, pulls and others opening devices are to have a shape and height that is easy for a person with reduced strength and dexterity to control. Swing door is preferable than sliding door. When a sliding door is to be used, the handle should be usable from both sides. Lever handles and push type mechanisms are recommended. (When a sliding door is fully open, handles should be usable from both sides.) The use of colour to distinguish doors from surrounding walls is very useful for people with visual impairments. Glass doors must have a bright, colored motif or manifestations at eye level so as not to confuse people. Avoid revolving doors or turnstiles. If they already exist, provide an alternative wheelchair-accessible entrance.
3d. Reception

Reception counters and information desks in the establishment should be located near the main entrance and clearly identified so that they are easily recognizable from the building entrance. Counters especially in noisy environments or those equipped with a separating security screen, should have at least one position fitted with a hearing enhancement system (e.g. induction loop system) to assist hearing-aid users. Avoid positioning counters in front of windows where bright sunshine causes the user’s face to be in shadow and hence difficult to lip-read. The counters should be accessible to wheelchair users on both sides as it may be a workstation for a wheelchair user on the employee side. A clear maneuvering space at least 1 500 mm square should be provided in front of the counter on the receptionist’s side and 1 800 mm square on the visitor’s side allows easy maneuvering space. The counter level should be between 750 mm to 800 mm from the floor with minimum 700 mm high clear knee space underneath for wheelchair users and at least a part of the counter should also be at a height suitable as a writing place for standing people, between 950 mm and 1 100 mm (for ambulant disabled users). To facilitate lip reading, lighting should provide even illumination of at least 200 lux on the reception counter.
3e. Public toilets – male, female & Unisex
Sanitary facilities shall be designed to accommodate a variety of users in a workplace building. Accessible toilets that can be used by both sexes (unisex accessible toilets) allow the greatest flexibility for people who require assistance hence is the preferred option.

Accessible staff toilets for male, female should be provided at the workplace which should have the universal sign of Accessibility displayed outside. WC or toilet compartments should have enough floor space for wheelchair users to enter and exit & transfer on to the WC. The seat of the toilet bowl should be at the correct height for the wheelchair users. Any accessory seat pad on the toilet seat should be firmly secured. WC compartments should have grab bars/ support rails at a position and height suitable for wheelchair users and other persons with physical disabilities. Upward-folding support bars are recommended to allow lateral transfer from the wheelchair. A toilet paper dispenser should be so installed as to be easily used by a person with physical impairments sitting on the WC. Fittings, such as soap dispenser, electric hand dryer and mirror, should be low enough for a wheelchair user to use comfortably. Floor finishes in the toilets should be of non-slip material. Doors should be either of the sliding or outward-opening type and provide clear opening of 900 mm. Locks to toilet doors or cubicle should be a type that can be opened from outside in case of emergency. Lock lever should be of the type that can be easily opened by person with weak grip. Where there is requirement of just one toilet, it should be a Unisex Accessible Toilet with enhanced space for urinals. For details refer Part 3, NBC.
3f. Amenities Drinking Water / Coffee
The drinking water facility (fountains, coolers, taps, etc.) or a coffee/tea vending machine where deployed for self-serving should be mounted on a wall or a post at a height easy to reach from a seated position, has a lever type easy to handle control that does not require fine finger movement and is operable by one hand and have clear floor space in front of it or parallel to it for easy manoeuvring of wheelchair chair etc. There shall be water glass provision; a minimum 100 mm space below the spout outlet be provided to allow for the insertion of a cup or glass. Wall-mounted drinking water provision in an alcove is preferred, because it does not create a hazard for persons with visual impairments. The provision of two drinking facilities at different heights is very convenient for standing adults, people in wheelchairs and children. Where only one is provided, it shall be at a height of 700 mm above floor level. Mechanism for water drainage and to keep the space dry and non-slip must be provide near drinking water as water spillage can make the space fall prone to users.

3g. Level changes
As far as possible there should be no level changes on the same floor. Where level changes are unavoidable, mechanisms to address differences of levels, such as ramps in appropriate gradient and lifts/ elevators of right dimensions. For example, a ramp of max gradient of 1:12 is acceptable for a level difference of 350 mm and a lower gradient of 1:18 may be needed for a higher-level difference.

Floor surface along accessible route and in accessible work spaces, including floors, walks, ramps, stairs and kerb ramps etc should be stable, firm and slip-resistant. Floor surfaces should not have any projections, drops or unexpected variation in levels. Changes in level less than and 12mm should be bevelled with a slope no greater than 1:2. Grating located along walking surfaces should not have spaces greater than 12 mm wide in one direction, and be placed so that the long dimension is across the dominant direction of travel. If carpets or carpet tiles are used on a floor surface, they should be securely attached to it and should not be thicker than 12 mm. Long, thick rugs should never be laid in areas likely to be frequented by persons with mobility and sight impairments. Edges of paths should be clearly defined by using different colours and textures to be identifiable.

3h. Signage & Contrast
Signage when multilingual, help the diversity of users. A signage with English and Hindi or local vernacular language is preferred in comparison to a single language. Signage should be in contrasting colours (70%) in distinct relief (raised) and in braille to allow visually impaired persons to obtain the information by touch. Use same system of signs throughout the building. Directional signs should be placed at locations along the route to designated areas. The signs should not protrude in circulation spaces so as to become a barrier for other users. Signs meant to be touched, should be within reachable heights of standing persons, have braille and tactile besides colour contrast requirements. Ceiling hung signs or signs that cannot be reached are not required to be braille or tactile. But they should be large enough to be read from the distance they are placed for and should have good colour contrast.
3i. Controls
All controls such as switches, opening and closing controls etc. which are meant to be operated by staff should be within reachable heights considering the reach ranges of people with diverse heights and disabling conditions.

The design and construction of operating controls, switches, devices which are meant to be operated by staff or visitors should be such as to enable them to be operated safely and independently by all users. This may include door handles and locks; lever, mixer or cross-head taps; activation devices; window openers and locks; and electric outlets and switches, etc.

The operable part of controls shall be located adjacent to the clear floor space. Controls should be easy to reach and use, for example by hands-free operation or by a closed fist or using the elbow. Minimum manual effort should be required, as for opening and closing doors. All switches and controls should be easy to understand without requiring specialist knowledge. Sufficient lighting of the control devices and all relevant information should be provided. Round or oval type door knobs are not suitable for people with mobility impairment, for people of small stature or less strength, and for children. For the ease of reach and operation, height of controls should remain in the range of 800 mm to 1100 mm above floor level and shall be located at a minimum of 700 mm from any internal corner.

**Heights of switches, socket outlets, reading controls and Controls on a horizontal surface**

**Key**
1. Fire alarm, call point
2. Fire extinguishers
3. Meter indicators
4. Control devices
5. Socket outlets All dimensions in millimeters
3j. Workplace and workstations
Work place area must have sufficient circulation space for mobility equipment such as wheelchairs, walkers or crutches. The work station or work desk should provide a clear manoeuvring space at least 1 500 mm x 1 500 mm in front of the workstation/desk. The lighting levels on the desk should provide sufficient illumination for carrying out the task. Technology deployed such as computers, machines etc. must be accessible and user-friendly. The software and applications must be accessible for diversity of workforce. Provision of silent areas, quiet rooms, segregated cabins are very helpful to integrate employees with neurodiversity at workplace. Decision to provide need specific accommodation can be taken by the employers in consultation with such staff members. Similarly, accommodations to buy accessible assistive technologies should be also provided in the close consultation with the staff.

3k. Common areas, Amenities and services
All common areas such as cafeterias, corridors, common services must meet the physical accessibility requirements of independent wheelchair maneuvering, circulation spaces, height of desks, counters and controls, and safety of employees. Corridors and internal circulation areas should be at least 1800 mm wide with no obstructions, be leveled, non-slippery, non-glary and provide orientation through use of tactile means and signages including braille etc.

3l. Tips & Good Practices
When planning and designing physical built environment, it would be a good idea to involve built environment accessibility experts, preferably those with higher level of expertise and international certification such as CPABE17
• Always consult and seek active feedback from the employees with disabilities.
• Idea is move beyond from compliance to the building code and sectoral standards but also take a step further to incorporate best practices and provide reasonable accommodation to meet a specific need of an employee to make inclusion possible.
• There are international standards in form of ISO 21542 and national standard in form of Part 3 of the National Building Code of India to guide establishments in additional to Harmonized Guidelines and Space Standards notified under section 15 of RPWD Rules.
• Include accessibility requirement as a mandatory clause in all RFPS and tenders.

17Certified Professional in Accessible Built Environments by IAAP, accessed on 11 June 2021 at link: https://www.accessibilityassociation.org/cpabeoverview
Section 4

Did you know

Did you know the vibration feature on mobile phones was actually made for deaf people to know when the phone was ringing.
4. Making virtual environment accessible and access to ICT

Establishments should ensure that all the contents available in audio, print and electronic media are in accessible formats and all their documents, communication and information technology systems adhere to the accessibility standards for Information and Communication Technology as per law. The establishment shall ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer.

Establishment websites, including careers pages, job portals and job application processes, must be accessible to persons with disabilities. Establishments should ensure that applicants and employees with disabilities can apply for jobs, access payroll and benefit information, and obtain other information through the employer’s website.

4a. What does the law say?
RPWD Act, 2016
42. Access to information and communication technology. - The appropriate Government shall take measures to ensure that,-
I. all contents available in audio, print and electronic media are in accessible format;
ii. persons with disabilities have access to electronic media by providing audio description, sign language interpretation and close captioning;
iii. electronic goods and equipment which are meant for everyday use are available in universal design.

RPWD Rules
15. Rules for Accessibility. - (1) Every establishment shall comply with the following standards relating to physical environment, transport and information and communication technology, namely:-
(c) Information and Communication Technology -
I. website standard as specified in the guidelines for Indian Government websites (GiGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India;
ii. documents to be placed on websites shall be in Electronic Publication (ePUB) or Optical Character Reader (OCR) based Pdf format.

4b. Websites
The websites open to public are required to be accessible for persons with disabilities. For government websites WCAG 2.0 AA standards are applicable as prescribed by GiGW. Private establishments should also follow these or more advanced versions of these standards.

4c. Communications
All communications, both internal and external must be accessible to a wide diversity of stakeholders. For example, all verbal communications may also be visual and in alternate formats. Where applicable, sign language interpretation should be provided in public functions, consultations and meetings to ensure accessibility of communication to deaf individuals. Other requests of alternate modes of communications should be considered for communicating with the employees, as defined in Section 2(f) of the RPWD Act, 2016
4d. Documents
All documents to be placed on websites or shared shall be in Electronic Publication (ePUB) or Optical Character Reader (OCR) based Portable Document Format (PDF) as required by Rule 15 (ii).

Note: Optical Character Recognition/ Reader, or OCR, is a technology that enables you to convert different types of documents, such as scanned paper documents, PDF files or images captured by a digital camera into editable and searchable data. However, the recommended resolution for best scanning results for OCR accuracy is 300 dots per inch (dpi).

4e. Software
In compliance to Section 42, all software procured must be accessible to people with disabilities. In terms of workplace, many software are deployed in BFSI sector such as tally, accounting software, banking software, SAP etc. The employers must ensure procurement of accessible technology / software for initial deployment as well as at the time of upgrade and ensure compatibility with screen reading softwares, ideally in consultation with the employees concerned.

4f. Tips & Good practices
• A website meeting the WCAG norms is not only accessible to diversity of users such as employees, customers, general public but is also compatible with diversity of platforms, devices and network connections.

• The employers must consider getting their IT department employees trained in web accessibility, document accessibility and preferably have them receive certifications such as CPACC, WAS, CPWA or ADS18 offered by IAAP.

• Include accessibility requirement as a mandatory clause in all RFPS and tenders.

18Professional Certifications from IAAP. Accessed on 11 June 2021 at link https://www.accessibilityassociation.org/certifications
Section 5

Did you know
Did you know the most common disability in the world today is depression?
5. Adopting Inclusive Policies in the company

The establishments should adopt policies that promote inclusion, discourage barriers of any kind and create a conducive and enabling environment for persons with disabilities. Easily understood, objective and transparent policies on process of reasonable accommodation, disciplinary and grievance redressal procedures, absence for health or rehabilitation related needs, health and safety, appraisal and performance management, promotion, training and development, procurement are important for disability inclusion in the establishment.

5a. What does the law say?

RPWD Act 2016 - Equal Opportunity Policy

21. (1) Every establishment shall notify equal opportunity policy detailing measures proposed to be taken by it in pursuance of the provisions of this Chapter in the manner as may be prescribed by the Central Government. (2) Every establishment shall register a copy of the said policy with the Chief Commissioner or the State Commissioner, as the case may be.

RPWD Rules- CHAPTER IV Employment

8. Manner of publication of equal opportunity policy.-

(1) Every establishment shall publish equal opportunity policy for persons with disabilities.

(2) The establishment shall display the equal opportunity policy preferably on their website, failing which, at conspicuous places in their premises.

(3) The equal opportunity policy of a private establishment having twenty or more employees and the Government establishments shall inter alia, contain the following, namely:-

a) facility and amenity to be provided to the persons with disabilities to enable them to effectively discharge their duties in the establishment;

b) list of posts identified suitable for persons with disabilities in the establishment;

c) the manner of selection of persons with disabilities for various posts, post-recruitment and pre-promotion training, preference in transfer and posting, special leave, preference in allotment of residential accommodation if any, and other facilities;

d) provisions for assistive devices, barrier-free accessibility and other provisions for persons with disabilities;

e) appointment of liaison officer by the establishment to look after the recruitment of persons with disabilities and provisions of facilities and amenities for such employees.

(4) The equal opportunity policy of the private establishment having less than twenty employees shall contain facilities and amenities to be provided to the persons with disabilities to enable them to effectively discharge their duties in the establishment.

9. Form and manner of maintaining records by the establishments. -

(1) Every establishment covered under sub-rule (3) of rule 8 shall maintain records containing the following particulars, namely:-

a) the number of persons with disabilities who are employed and the date from when they are employed;

b) the name, gender and address of persons with disabilities;

c) the nature of disability of such persons;

d) the nature of work being rendered by such employed person with disability; and

e) the kind of facilities being provided to such persons with disabilities.

(2) Every establishment shall produce for inspection on demand, records maintained under these rules, to the authorities under this Act and shall supply such information which may be required for the purpose of ascertaining whether the provisions have been complied with.
5b. Govt. incentives to private employers supporting inclusion

In light of Sec 35 of RPWD Act, Government of India has brought in a revised incentive scheme to further encourage private establishments to employ persons with disabilities and ensure that 5% of their workforce is comprised of people with benchmark disability.

The scheme inter alia provides: -

(a) Department of Empowerment of Persons with Disabilities (DEPwD) will pay the EPF / ESI contributions in respect of their employees with disabilities directly to the EPFO and ESIC, when an employer informs the EPFO and ESIC about the appointment made and furnishes the PwD employee’s contribution.
(b) The scheme is applicable to all persons with disabilities employed in the private sector irrespective of any salary / wage ceiling.
(c) The administrative charges applicable on EPF/ESI contribution (at the extant rates) shall also be borne by the DEPwD.
(d) Government shall pay the employers contribution to EPFO & ESIC for 10 yrs.
(e) In addition, one-third of the gratuity amount due and admissible to PwD employees which is required to be paid by the employers under the applicable provisions of the Gratuity Act, shall be borne by the DEPwD.

Govt. of India also recognizes employers in different categories by way of National Awards for Empowerment of Persons with Disabilities on the eve of International Day of Persons with Disabilities on 03rd December each year.

5c. Equal opportunity Policy

In light of the requirements of Section 21 of RPWD Act and Rule 8 of RPWD Rules, all establishments are required to publish an Equal Opportunity Policy detailing various measures taken by the establishment to provide an inclusive environment for persons with disabilities. A sample policy each for a Government Establishment and for a Private Establishment employing 20 or more persons are at Annexure 1 and 2 respectively.

5d. Liaison Officer cum Inclusion Officer

Rule 8 of RPWD Act mandates having a Liaison Officer. Responsibilities include:

• Implementing the action plan for making the workplace and ICT systems accessible for people with disabilities by liaising with the various departments in the establishment.
• Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy.
• Developing proactive strategies to prevent discrimination and harassment including conducting sensitization programs.
• Provide reasonable accommodation to applicant and employees with disabilities.
• His/her contact number should be made available on the company website. • Share the quarterly progress report with the HR Head who would then present the progress report to the head of establishment.

All department heads and employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others. Managers should act promptly when concerns arise or complaints are made.

19Incentive Scheme for Providing Employment to Persons with Disabilities (PwDs) in the Private Sector (2017) by Department of Empowerment of Persons 19 with Disabilities, Govt. of India, accessed on 11 June 2021 at link: http://disabilityaffairs.gov.in/upload/uploadfiles/files/Incentive%20Scheme%20under%205%20PDA.pdf
5e. Grievance Redressal (Rule 3 of RPWD Rules 2017)

Private Establishment
The establishment shall appoint a Grievance Redressal Officer who would be a senior official not below the position of Head of Department for HR / Administration and who is trained in handling grievances related to disability discrimination and harassment. An employee with disabilities, if feels discriminated against, on the grounds of disability in the establishment can raise the grievance with the Head of the Establishment or Grievance Redressal Officer if the issue has not been addressed at the level of the Liaison Officer.

Govt. establishment
The govt. establishment shall appoint an officer not below the rank of a Gazetted Officer as Grievance Redressal Officer and immediately inform the Chief Commissioner State Commissioner for Persons with Disabilities, as the case may be. Provided that where it is not possible to appoint any Gazetted Officer, the establishment may appoint the senior most Officer in the office as a Grievance Redressal Officer. The updated contact details of Grievance Redressal Officer shall be displayed on organization’s website.

Procedure to be followed
The Head of Establishment / Grievance Redressal Officer shall follow the procedure of grievance redressal as followed for conducting an official enquiry.

Duties and Responsibilities of the Grievance Redressal Officer
i. Receive, register and investigate the complaints/ grievances.
ii. Take up the matter with the establishment for corrective action to address grievances of persons with benchmark disabilities;
iii. To maintain a register of complaints in the manner as may be prescribed by the Central Government.
iv. To inquire the complaint/ grievance within two weeks of its registration.
v. If the aggrieved person is not satisfied with the action taken on his or her complaint, advise him the next course of action i.e. appeal before the District-Level Committee on disability appointed by the State under section 72 of RPWD Act 2016;
   • vi. Prepare and implement an action plan and developing proactive strategies to prevent discrimination and harassment;
   • vii. Ensuring employees, students and other stakeholders are aware of the Equal Opportunity Policy;
   • viii. Share the quarterly report with the designated authority in the organization.
ix. Create an environment where all employees are encouraged to report any incidents of violation of rights of the persons with disabilities to the concern authority.

5f. Human Resource Policies
(i) List of positions for persons with disabilities
The establishments should ideally have all positions open for people with all types of disabilities. The recruitment should be purely based on merit and the candidates should be evaluated based upon their skills and competence. Flexibility and reasonable accommodations should be provided to persons with disabilities on an individual basis.

For govt establishments, list of identified posts has been published by Govt. of India which shall be followed and supplemented with more identified post at the level of the establishment.
(ii) Recruitment/Vacancy advertisement and application
If employers use services of employment or placement agencies, the website and application processes of such agencies should also be accessible. If websites are not complying to WCAG standards, the job seekers with disabilities may experience commonly found barriers such as complex navigation and timeout restrictions, poor screen contrast, images that convey information but do not have alternative text for individuals using screen readers, online applications that cannot be navigated with keystrokes and instead require using a mouse, videos or audio instructions that are not closed-captioned and lack of information on how to request an accommodation.

Wherever possible, all vacancies should be advertised internally and externally on platforms that can be easily accessed by potential applicants.

a. Vacancies arising be notified / returns furnished to the special employment exchanges as per govt. guideline and where possible to disability organizations, colleges, polytechnics, skill training centres etc.

b. All vacancy advertisements to include an appropriate short statement on equal opportunities for people with disabilities such as "Persons with Disabilities are encouraged to apply and that employer is an equal opportunity employer."

c. Selection criteria should be non-discriminatory and be reviewed periodically to assess the skills needed for the job.

d. Application forms to be made available in alternate formats, based on request.

e. When advertisements and application process is online, it should be accessible to persons with disabilities.

(iii) Selection Process
a. With merit as the focus, relaxation should be considered for people with disabilities on a case by case basis as per the reasonable accommodation guidelines.

b. The selection process must be accessible and should be objective and should not screen out applicants merely because they cannot negotiate the inaccessible process.

(iv) Interview process & protocols
The selection method by interview is inherently subjective and no matter the efforts brought in to make it objective, it is difficult to eliminate subjectivity and biases on personal decisions. Therefore, utmost care should be taken to evaluate through this method and following should be considered:

- Wherever possible, more than one person shall be involved in the selection interview and recruitment process, and one person may be a person with disability.
- All officials involved in the recruitment process should have received appropriate training on the topic of equal opportunities for people with disabilities.
- It is preferable to have an external expert / NGO member who have experience in the field of disability inclusion as a part of the selection panel.
- Each interviewer is mandated to record her/his comments on the candidate’s capability in the Interview Evaluation Form.
- Reasons for rejection must be objective and not related to the person’s disability.
(v) Job rotation & transfers
Employees with disabilities should be provided opportunities of job rotation as this gives them equal exposure to different job roles performed in the establishment and will prepare them for promotion to the next senior positions. The employers should consider the following in this regard:
• Wherever possible, job rotation should be provided within the same workplace.
• As far as possible, the persons with disabilities may be exempted from the rotational transfers.

Persons with disabilities across all grades and an employee who has a spouse or a child with disabilities, may be provided preference in place of posting at the time of normal transfer/transfer on promotion subject to the administrative constraints, choices exercised by employee at the time of consideration and recruitment for the post for which employee with disability has been appointed vis-à-vis availability of such vacancies/ requirement in the new place of posting.

(vi) Appraisal & career progression
The establishment shall provide an accessible and inclusive appraisal process. An employee with disability requiring any accommodations for the appraisal process may place a request with the Liaison Officer at least two days in advance. The appraisal should be objective and the process should be accessible and convenient. The employee should be appraised only on the work areas he has undertaken or was assigned.

(vii) Employee engagement etc.
The establishment will endeavor to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues and accessible digital platforms for online meetings.

(viii) Leave & Absence
For Govt. establishments, employees with disabilities are entitled to special casual leave of not more than 10 days in a calendar year for participating in conference/ seminars/ training/ workshop on disability and development related programmes organized at National and State Level agencies specified by the Ministry of Social Justice and Empowerment. Additional benefit of 4 (four) days special casual leave in a calendar year is granted for specific requirements relating to the disability of the employee. These 14 days are in addition to the usual quota of casual leaves. The special leave for all practical purposes is treated like casual leaves that lapses, if not availed by 31st Dec of each year.

In a private establishment, an employee’s request for extra leave beyond what is normally permissible for an employee, for a reason related to her/ his disability, to a maximum of 8 days in a year should be treated as a request for reasonable accommodation and should be evaluated accordingly. A private establishment may also provide an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment.
(ix) Return to work

Return-to-work is a process designed to help employees acquiring disability due to illness or injury get back to work in a safe and timely manner. The private establishments should consider developing return to work policy and strategies as it can help an employer:

- Control direct and indirect absenteeism costs
- Reduce lost productivity
- Reduce need to train replacement workers
- Increase morale and improves operations
- Maintains skill sets of valuable and experienced employees

Return-to-work strategies can include bringing an employee back to work part-time, work from home, allowing them to telecommute, modifying work schedules/ tasks, and/or providing other workplace accommodations. If an employee acquires a disability during the employment tenure, the employee can return to work at the same rank as before. In case the employee is unable to perform the current job, the establishment should invest in reskilling the employee for another position at the same rank or higher.

5g. Social protection on acquiring disability

If an employee acquires disability, and cannot handle the job profile anymore and it is not possible to adjust the employee against any other post with same or higher designation perks, he may be kept on a supernumerary post until a suitable post is available or he attains the age of superannuation, whichever is earlier (aplicable to govt. establishments).

5h. Vendor policies

The establishment must put in place inclusive procurement practices that create long-term value for clients and communities and ensure that supplier diversity is woven into the company’s business strategies and procurement practices. For example, potential vendors or suppliers need to provide evidence in their tenders that they take equality and inclusion seriously and respect and promote disability inclusion.

The establishment should give preference or additional weightage to a vendor that promotes inclusion of persons with disabilities in the workforce or procures raw material that are sourced from similar sections of society.

5h. Tips & Good Practices

- The establishment should proactively work towards ensuring that at least 5% of its workforce is comprised of people with benchmark disability.
- If an employee acquires a disability during the employment tenure, the employee should be allowed to return to work at the same rank as before.
- In case the employee is unable to perform the current job, the establishment should invest in re-skilling the employee for another position at the same rank or higher.
- It should ensure a robust career growth path for persons with disabilities and for those who acquire a disability during their employment tenure.
Did you know

Did you know one of the biggest stereotypes about disability is the PwDs cannot lead a productive and fulfilling life
6. Facilitating enabling environment through Reasonable Accommodation

The establishment should make reasonable accommodations, whenever requested or felt necessary, for employees or job applicants with disabilities. The accommodations are need-based and specific to provide a level playing field to person with disabilities irrespective of their degree of disability. Such accommodation should be provided:

- to ensure equal opportunity in the application and selection process,
- to enable an employee with a disability to perform the essential functions of a job, and
- to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

The establishment shall ensure that a person with disability is not compelled to pay (partly or fully) the costs incurred for reasonable accommodation. This shall be borne by the establishment.

Refusal of reasonable accommodation may amount to discrimination on the basis of disability making the employers liable for legal action. However, it’s also important to remember that not all employees with disabilities require accommodations and degree of disability has no relation to the need of reasonable accommodation, thus an employee seeking accommodation may not always be a person with benchmark disability. The focus is to meet this need on case to case basis.

Highlighting the role of reasonable accommodation, the Supreme Court of India in Vikash Kumar judgement supra, in para 45-46 observed: "45 The principle of reasonable accommodation acknowledges that if disability as a social construct has to be remedied, conditions have to be affirmatively created for facilitating the development of the disabled. Reasonable accommodation is founded in the norm of inclusion. Exclusion results in the negation of individual dignity and worth or they can choose the route of reasonable accommodation, where each individuals' dignity and worth is respected. Under this route, the 'powerful and the majority adapt their own rules and practices, within the limits of reason and short of undue hardship, to permit realization of these ends'.

46. In the specific context of disability, the principle of reasonable accommodation postulates that the conditions which exclude the disabled from full and effective participation as equal members of society have to give way to an accommodative society which accepts difference, respects their needs and facilitates the creation of an environment in which the societal barriers to disability are progressively answered. Accommodation implies a positive obligation to create conditions conducive to the growth and fulfilment of the disabled in every aspect of their existence – whether as students, members of the workplace, participants in governance or, on a personal plane, in realizing the fulfilling privacies of family life. The accommodation which the law mandates is 'reasonable' because it has to be tailored to the requirements of each condition of disability. The expectations which every disabled person has are unique to the nature of the disability and the character of the impediments which are encountered as its consequence."
6a. What does the law say?
RPWD Act.
Section 2 (h) "discrimination" in relation to disability, means any distinction, exclusion, restriction on the basis of disability which is the purpose or effect of impairing or nullifying the recognition, enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms in the political, economic, social, cultural, civil or any other field and includes all forms of discrimination and denial of reasonable accommodation;

Section 2 (y) "reasonable accommodation" means necessary and appropriate modification and adjustments, without imposing a disproportionate or undue burden in a particular case, to ensure to persons with disabilities the enjoyment or exercise of rights equally with others;

Section 3. Equality and non-discrimination.

(1) The organization shall ensure that the persons with disabilities enjoy the right to equality, life with dignity and respect for their integrity equally with others. (2) The organization shall take steps to utilize the capacity of persons with disability by providing appropriate environment. (3) It shall make sure that no persons with any kind of disabilities shall be discriminated on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim. (4) No person shall be deprived of his or her personal liberty on the ground of disability. (5) The organization shall take necessary steps to ensure reasonable accommodation for persons with disabilities.

RPWD Rules
3 (4). No establishment shall compel a person with disability to partly or fully pay the costs incurred for reasonable accommodation.

6b. Reasonable Accommodations Process
The establishment should formulate Reasonable Accommodation Request Form and Reasonable Accommodation Policy/Guidelines in which the process for availing accommodations should be detailed out. The reasonable accommodation should be provided to a candidate with disabilities appearing in the recruitment process as well as after joining the workplace in consultation with the candidate. All documents concerning an employee's reasonable accommodations request should be maintained in the employee's confidential file, separate from the employee's official personnel file.

Each establishment should have a process to review reasonable accommodation requests on a case-by-case basis. If an accommodation request places an "undue burden" on the organization, organizations should make every effort to find alternatives before completely denying a request.

The process to request reasonable accommodation should be provided on its website, as well as in the employment notification itself. This should include name of the contact person, their number, email as well as online link to place the individual request. This will make it simpler and less stressful on both the employer and employee.
### 6c. Suggested Reasonable Accommodation for diverse needs

<table>
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<tr>
<th>Sl No.</th>
<th>Some suggestive Reasonable Accommodation that may be extended to people with disabilities</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Modifying assessment protocols and training materials for promotional or career improvement programs; and other relaxations for appearing in skill tests.</td>
</tr>
</tbody>
</table>
| 2     | **Communication modifications:**  
(a) Providing Audio amplification system, captions to videos, induction loop system, assistive listening devices and Sign Language interpreters for Deaf individuals or individuals who are hearing difficulties.  
(b) Readers for blind people, people with low vision, or prompters to individuals with learning disabilities  
(c) Large print or electronic documents accessible by screen reader  
(d) Text-based communication for people with autism, people who have hearing or speech related disabilities  
(e) Simple, direct language usage to help individuals with intellectual disabilities  
(f) Increasing or dimming lighting at workplace to meet a specific need.  
(g) Audio visual communications including for events, meetings, emergencies etc.  
(h) Live captioning for online / virtual meetings  
(i) Language translations  
(j) Augmentative and Alternate Communications for people with speech & language disabilities |
| 3     | **Providing Job Coaches** to help assist an individual with disability in learning new job tasks or helping them complete their job tasks more proficiently. |
| 4     | **Return-to-work strategies** can include bringing an employee back to work part-time, work from home, allowing them to telecommute, modifying work schedules/tasks, and/or providing other workplace accommodations. |
| 5     | **Modification in workplace rules/ norms**  
a. Making provision of a Quiet Room for short break / calming areas to allow individuals to get away from noisy areas.  
b. Allowing a person to sit.  
c. Allowing desk eating breaks to someone with diabetes.  
d. Allowing frequent bathroom breaks.  
e. Banning artificial scents in the workplace or simply ensuring scent free environments.  
f. Providing a parking/ storage facility and charging point to charge electronic assistive devices or mobility devices such as a wheelchair/ cycles etc.  
g. Providing human assistance/ buddies where required. Providing workstations in enclosed cabins to avoid distraction |
<p>| | |</p>
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</table>
| 6 | Acquiring or modifying equipment or devices, assistive technologies etc.  
a. Providing speech-to-text software.  
b. Providing computers, laptops, phones, screening reading software, scanners, braille note takers,  
c. Providing induction loops or hearing enhancement systems and machines, assistive technologies etc. that enhance functional capabilities of employees with disabilities.  
d. Purchasing only accessible software or applications that are used at work such as for accounting, human resources, logistics, travel, research or for appearing in examinations etc.  
e. Providing training to employees on use of such assistive devices/technologies  
f. Purchasing ergonomic equipment that promotes occupational health.  
g. Allowing noise cancelling headphones for individuals with sensory or auditory processing disabilities.  
Providing wheelchairs, electric wheelchairs, other mobility equipment or assistive devices etc. |
| 7 | **Position restructuring**  
a. Changing some of the less essential job tasks and shifting them to another position. This can include lifting or physically strenuous tasks for a position that is primarily administrative.  
b. Changing leave policies to meet specific needs such as for those receiving medical treatment, rehab therapies or recovering from an illness or injury.  
Exploring other less conventional workplace strategies to promote inclusion. |
| 8 | **Enablers during Examinations**  
a. Facility of scribe /writer or amanuensis to those who need it, such as people with vision impairments, people with writing difficulties  
b. 20 minutes per hour additional compensatory time for completion of examination paper  
c. Modification in questions and exam methods. For e.g. objective questions instead of subjective  
d. Allowing exam on computer/type writer instead of handwritten |
| 9 | **Misc.**  
a. providing relaxations to persons with benchmark disabilities such as age relaxations of 10 years as given by most banks to all categories of persons with disabilities,  
b. no fee charged for making a job application,  
c. transport allowance, allowing cost of travel of a family member / attendant where employee needs support during work related travel etc.  
d. any other relaxation or accommodation on case to case basis provided after discussions with the employee with disabilities. |
6d. Provision of Assistive Devices & Equipment
The persons with disabilities could perform their duties efficiently if they are provided with aids and appliances which are suitable to their needs. Employees with disabilities may be allowed reimbursement towards expenses incurred by them towards purchase/ replacement/ repair/ adjustment of artificial limbs/ appliances for self; reimbursement towards Low Vision Aids for visually challenged employees and Hearing Aid/ Hearing aids with battery for hearing impaired employees. The establishment shall also assist employees with disabilities by providing them hi-tech/latest technology led assistive devices and solutions (e.g. screen reading software), special furniture, wheelchairs (motorized if required by the employee), software, scanners, computer and other hardware etc. in accordance with their requirement, which would improve their efficiency and productivity.

6e. Accessible Transportation
The establishment shall take suitable measures to provide accessible and inclusive transport facilities and related infrastructure for persons with disabilities to attend workplace. Where transport is not provided, Transport Allowance may be considered to employees with disabilities. In case of Govt. employees with disabilities, it is provided at double the normal rate.

6f. Quiet Rooms
A quiet room is very literally, a room that is quiet. The room can be used by employees whenever they feel as though the office environment has become overwhelming, they need a moment to switch off, or even want to meditate/say a prayer.

Generally, most people can do their jobs with noise in the background, problems arise when there is no relief or escape from the noise. Even just a short break away from the noise can reset and refresh an employee. Meaning that they can get back to work, feeling less stressed and more productive. These rooms are helpful to people with disabilities, especially with neuro-diverse conditions such as autism, learning disabilities or those with mental health conditions and are considered as part of reasonable accommodation at workplace or in busy public spaces.

6g. Tips & Good practices
- Workplace inclusion requires a team effort. A top down approach may not always be successful. Each person in the team plays its role.
- Persons with disabilities need to be seen in the establishment at all levels and not just in the junior positions.
- The suggested reasonable accommodations are not exhaustive and more accommodations could be provided in consultation with the employees with disabilities on case to case basis.
- Degree of disability is no criteria to allow or disallow a request of reasonable accommodation. Someone with a lesser degree of disability may need an accommodation too!
- Larger inclusion will be realized when establishments gradually move to a situation where accommodations are routinely used by all employees for these can create better harmony and team work at workplace.
Section 7

Did you know
According to the World Bank, there are 8 crore people with disabilities in India.
7a. What does the law say?

RPWD Act, 2016

Section 7. Protection from abuse, violence and exploitation.
(1) The appropriate Government shall take measures to protect persons with disabilities from all forms of abuse, violence and exploitation and to prevent the same, shall
(a) take cognizance of incidents of abuse, violence and exploitation and provide legal remedies available against such incidents;
(b) take steps for avoiding such incidents and prescribe the procedure for its reporting;
(c) take steps to rescue, protect and rehabilitate victims of such incidents; and
(d) create awareness and make available information among the public.

Section 8. Protection and Safety. –
(1) The persons with disabilities shall have equal protection and safety in situations of risk, armed conflict, humanitarian emergencies and natural disasters.

Section 39. Awareness campaigns. -
(1) The appropriate Government, in consultation with the Chief Commissioner or the State Commissioner, as the case may be, shall conduct, encourage, support or promote awareness campaigns and sensitization programmes to ensure that the rights of the persons with disabilities provided under this Act are protected.

(2) The programmes and campaigns specified under sub-section

(1) shall also -

a) promote values of inclusion, tolerance, empathy and respect for diversity;

b) advance recognition of the skills, merits and abilities of persons with disabilities and of their contributions to the workforce, labour market and professional fee;

c) foster respect for the decisions made by persons with disabilities on all matters related to family life, relationships, bearing and raising children;

d) provide orientation and sensitization at the school, college, University and professional training level on the human condition of disability and the rights of persons with disabilities;

e) provide orientation and sensitization on disabling conditions and rights of persons with disabilities to employers, administrators and co-workers;

f) ensure that the rights of persons with disabilities are included in the curriculum in Universities, colleges and schools.
7b. Disability Etiquettes & Sensitization

Besides undertaking activities to promote values of inclusion, tolerance, empathy and respect for diversity at the workplace and to raise awareness of fellow workers and senior management about recognition of the skills, merits and abilities of persons with disabilities and of their contributions to the workforce and labour market, employers must also conduct sensitization programs to promote disability etiquettes giving special focus on the rights of women with disabilities. This is particularly important for teams that has persons with disabilities on it or are expecting new team member(s) with disabilities.

The language we use to talk about disability plays an extremely important part in the way society views people with disabilities. This is often a confusing area since people who are not disabled themselves feel worried about offending one particular group of people by using the wrong term and the terminology adopted by persons with disabilities often changes. Negative and patronizing language produces negative and patronizing images.

Certain terminologies like differently abled, physically challenged and recently ‘divyang’ have gained popularity in India. However, these terms should not be used as they reinforce the stereotype and focuses on the impairment of the person and not on the society where the problems and the barriers are. The persons first approach, as adopted in the UNCRPD and the RPWD Act is strongly recommended.

The issue of terminology has been greatly debated and according to the disability rights movement some terminologies are considered appropriate and some should not be used.

**Table:** Examples of words to be watchful of and their acceptable alternatives.
<table>
<thead>
<tr>
<th>Words to avoid</th>
<th>Acceptable Alternative words that promote persons first approach</th>
</tr>
</thead>
<tbody>
<tr>
<td>The disabled</td>
<td>Person/s with disabilities</td>
</tr>
<tr>
<td>Abnormal/subnormal</td>
<td>Persons with (specific disability) e.g. a person with intellectual disability</td>
</tr>
<tr>
<td>The blind</td>
<td>Person who is blind or person with visual impairment</td>
</tr>
<tr>
<td>The deaf</td>
<td>Person who is deaf or person with hearing impairment</td>
</tr>
<tr>
<td>Dwarf/vertically challenged</td>
<td>Person of short stature</td>
</tr>
<tr>
<td>Albino</td>
<td>Person with albinism</td>
</tr>
<tr>
<td>Cripple/cripped</td>
<td>Person with a physical or orthopaedic impairment or disability</td>
</tr>
<tr>
<td>Confined to a wheelchair/ wheelchair bound</td>
<td>Wheelchair user: a wheelchair provides mobility not restriction</td>
</tr>
<tr>
<td>Disabled room</td>
<td>Accessible Toilet/ Accessible Room</td>
</tr>
<tr>
<td>Mentally retarded/ defective/ feeble minded/ imbecile/ moron</td>
<td>Person disability with an Intellectual</td>
</tr>
<tr>
<td>Unsound mind</td>
<td>Person/s with mental health issues or psycho-social disabilities</td>
</tr>
<tr>
<td>Spastic</td>
<td>Person/s with cerebral palsy</td>
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</tbody>
</table>
Breaking the age-old myths that exist in the community due to non-interaction with persons with disabilities is another important objective of such sensitization programs. For instance, many people believe that persons with disabilities have a sixth sense, which is completely untrue.

**Table:** Examples of prevailing myths and the facts.

<table>
<thead>
<tr>
<th>Myth</th>
<th>Fact</th>
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<tbody>
<tr>
<td>Person with visual impairments acquire a sixth sense</td>
<td>Most persons with visual impairments develop their remaining senses more fully but do not develop a sixth sense</td>
</tr>
<tr>
<td>All wheelchair users are sick / ill</td>
<td>This association may be from hospitals using wheelchairs to transport patients; A persons may use a wheelchair for many reasons and not just illness</td>
</tr>
<tr>
<td>Persons with disabilities always need help</td>
<td>Many persons with disabilities are independent and capable of giving help. If you want to help always ask first</td>
</tr>
<tr>
<td>Persons with disabilities are more comfortable with &quot;their own kind&quot;</td>
<td>Grouping people in separate schools/ institutions can reinforce this idea. Inclusion programmes are challenging this</td>
</tr>
<tr>
<td>Disability is always inherited</td>
<td>Some forms are related to genes (e.g. albinism or muscular dystrophy) but others can be caused by accidents etc.</td>
</tr>
<tr>
<td>Persons with disabilities cannot have sexual relations or called asexual</td>
<td>Anyone can have relations by adapting the activity. Persons with disabilities are sexual beings like anyone else</td>
</tr>
</tbody>
</table>
7c. Rights and Duties of Employees with Disabilities

It is equally important that employees with disabilities are also made aware of their duties and rights so that they act accordingly at the workplace. Employees with disabilities should be supported but never be pampered as it may lead to general indiscipline and also set wrong precedent for fellow employees. Due to lack of opportunities and exposure in the past, some employees with disabilities may need support and mentoring, however, it needs to be constantly reinforced that rights and duties are two sides of the same coin. Employees with disabilities have a right not to be discriminated due to their disability and their specific needs requiring accommodations. Employees have a right to receive training on assistive devices, technologies that will be introduced at the workplace. Employees have a right to know about facilities, support, procedure to get the support, coordinates of liaison cum inclusion officer or the contact person at the workplace who need to be approached, contents of the equal opportunity policy, reasonable accommodation guidelines etc. Employees with disabilities for example have a right to accessible and safe workplace, right to be included in all events organized for fellow employees like retreats, trainings, celebrations, team building activities, etc. For instance, provision of sign language interpretation during all such event is a right of an employee who is deaf. Employees with disability have a right to privacy, respect, dignity, fair treatment at work, equal pay for equal work, right to seek reasonable accommodation, equal opportunities for learning, development and career advancement, etc.

7d. Rights and Duties of Employers

Employers have long been unclear of their rights and duties especially those in the private sector. The RPWD Act makes various provisions that clarifies what the duties of the employer are:

- Right to obtain work and contribution of employees with disabilities to achieve objectives of the establishment.
- Right to refuse accommodations that bring undue burden and not viable. • Ensure the protection and safety of persons with disability in cases of any risk, humanitarian emergencies or natural disasters.
- Not to discriminate against persons with disability in matters relating to employment and also ensure reasonable accommodation and a barrier free conducive working environment to them.
- Provide reservation in jobs to identified benchmark disabilities as per law. • Not to deny promotion to a person merely on the ground of disability.
- If an employee acquires disability, and cannot handle the job profile and it is not possible to adjust the employee against any post, he may be kept on a supernumerary post until a suitable post is available or he attains the age of superannuation, whichever is earlier.

  (applicable to govt. establishments)
- Notify equal opportunity policy detailing measures proposed to be taken by it for inclusion of persons with disabilities and register a copy of the said policy with the Chief Commissioner or the State Commissioner, as the case may be.
- Maintain records of the persons with disabilities in relation to the matter of employment, facilities provided and other necessary information in compliance with the provisions of Chapter IV, of RPWD Act.
- Keep records maintained open to inspection at all reasonable hours by such persons as may be authorized by the appropriate Government.
- Report vacancies arising in the establishment to the special employment exchanges created under section 36 of RPWD Act.
- Appoint Inclusion Officer cum Liaison officer for persons with disabilities
- Create Dispute/ Grievance Redressal Mechanisms with escalation procedures and let stakeholders be aware of the same.
7e. Maintenance of Records
The establishments shall collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per the RPWD Act. In particular, following information records shall be always maintained and produced for inspection on demand, or supplied to the authorities under this Act:

(a) the number of persons with disabilities who are employed and the date from when they are employed, whether on rolls or contract etc; (b) the name, gender and address of persons with disabilities; (c) the nature of disability of such persons; (d) the nature of work being rendered by such employed person with disability; and (e) the kind of facilities being provided to such persons with disabilities.

All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that they may have. An employee can edit the information at any time during the tenure. An employee who acquires disability can also edit and update the form attaching a copy of the disability certificate where certified as a benchmark disability. The information that an employee shares about her/his disability shall be kept confidential. It shall be maintained in a separate file and not in her/his personal file. Exceptions to the confidentiality clause:

i. Managers/Supervisors may be given information about an employee’s disability for allowing/providing any accommodations. ii. Security personnel may be given information about an employee’s disability so as to facilitate obtaining any necessary support during an emergency. iii. Government officials who are investigating the compliance with the RPWD Act may be given information about an employee’s disability.

7f. Emergency & Evacuation Protocols
Employees with disabilities in a workplace shall be identified and included in the emergency response protocol. Staff, buddies and security personnel may be allocated to provided assistance in case of emergency with each identified employee or visitor in the building.

Refuge areas should be earmarked in the workspace where persons with non-ambulatory disabilities could assemble and be safely evacuated. Signage should be installed in the precincts to orient staff with and without disabilities to safety and assist others. Frequent drills should be conducted to an inclusive response system. Persons with disabilities should be promoted to be active contributors to the disaster response rather than being passive recipient of services.

7g. Tips & Good Practices
Many provisions made for persons with disabilities have been found to be extremely useful for their non-disabled counterparts. Whether it is an accommodation at workplace or a policy relaxation to meet a specific need. Many employees who may not have a benchmark disability may greatly need and benefit from the reasonable accommodation. Therefore, all requests for accommodations should be on case to case basis with larger objective to provide a convenient workplace where all employees remain motivated.
Establishments also need to prepare themselves to meet the needs of customers with disabilities and not just employees with disabilities. To enhance the customer experience, following may be considered:

Gather feedback to identify new or re-think existing services/solutions for your customers with disabilities

Increase front line staff knowledge and understanding on interacting with customers with disabilities

Consider accessibility criteria and standards when reviewing and designing products and services

Ensure diverse representation of people of all abilities in advertisements and commercials

When hosting events, provide guests and customers the opportunity to share their accessibility requirements to fully participate

Ensure infrastructure, including physical locations and virtual platforms, are barrier free and accessible to customers

Provide alternative methods for customers to contact your company

Ensure company documents are available in different formats e.g. different font, audio, etc.

Engage employees with disabilities to understand their lived experience, needs and new market opportunities. Ensure they are involved at the beginning with planning communications, developing messages, choosing channels, creating materials and delivering elements of your design stages.
8. Annexures

(1) Sample Template of Equal Opportunity Policy of a Govt. Establishment
(2) Sample Template of Equal Opportunity Policy of a Private Establishment
(3) Workplace Inclusion Checklist
### Workplace Inclusion Checklist

<table>
<thead>
<tr>
<th>Sl No</th>
<th>Areas of Focus</th>
<th>Yes/ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Equality and fair treatment at work</td>
<td></td>
</tr>
<tr>
<td>2</td>
<td>Hiring process and employee orientation</td>
<td></td>
</tr>
<tr>
<td>3</td>
<td>Employee engagement and retention</td>
<td></td>
</tr>
<tr>
<td>4</td>
<td>Assistive Technology and devices with provisions of specialized training of its usage</td>
<td></td>
</tr>
<tr>
<td>5</td>
<td>Reasonable accommodations</td>
<td></td>
</tr>
<tr>
<td>6</td>
<td>Flexible work arrangements</td>
<td></td>
</tr>
<tr>
<td>7</td>
<td>Accessible communication formats, Accommodations to ensure access to all forms of communications</td>
<td></td>
</tr>
<tr>
<td>8</td>
<td>Accessible design for work related devices</td>
<td></td>
</tr>
<tr>
<td>9</td>
<td>Learning and development</td>
<td></td>
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<tr>
<td>10</td>
<td>Equal opportunities of promotion and career building to all employees</td>
<td></td>
</tr>
<tr>
<td>11</td>
<td>Mentorship program to ensure that employees of different backgrounds receive development support and guidance in their careers. Building peer support/buddy system</td>
<td></td>
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<tr>
<td>12</td>
<td>Performance Management – the performance expectations are the same for an employee with disabilities and others (for eg. Clear career progressions planning and availability of training to facilitate this.)</td>
<td></td>
</tr>
<tr>
<td>13</td>
<td>Conflict Resolution Process</td>
<td></td>
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</table>
# WORKPLACE INCLUSION CHECKLIST

<table>
<thead>
<tr>
<th>SI No</th>
<th>Areas of Focus</th>
<th>Yes/ No</th>
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</thead>
<tbody>
<tr>
<td><strong>1</strong></td>
<td>Accessibility of Built Environment, Website and ICT 1</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Accessible within the workplace precincts.</td>
<td></td>
</tr>
<tr>
<td><strong>2</strong></td>
<td>Accessible buildings and work areas including work station designs in</td>
<td></td>
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<tr>
<td></td>
<td>compliance of national standards</td>
<td></td>
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<tr>
<td><strong>3</strong></td>
<td>Accessible toilets, lifts and socialising areas (for example, cafeteria/ canteen)</td>
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<tr>
<td><strong>4</strong></td>
<td>Accessible Meeting rooms and Libraries</td>
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<tr>
<td><strong>5</strong></td>
<td>Effective emergency evacuation strategy and safety measures</td>
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<tr>
<td><strong>6</strong></td>
<td>Accessible Information and Communication Technologies including Assistive</td>
<td></td>
</tr>
<tr>
<td></td>
<td>technologies, online meeting applications.</td>
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<tr>
<td><strong>7</strong></td>
<td>Accessibility of websites, applications, software etc.</td>
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</table>

**Ensuring Inclusive Work culture**

<table>
<thead>
<tr>
<th>SI No</th>
<th>Areas of Focus</th>
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<tbody>
<tr>
<td><strong>1</strong></td>
<td>Defined goals for workplace inclusiveness and harmony</td>
</tr>
<tr>
<td><strong>2</strong></td>
<td>Form an employee resource group for assistance</td>
</tr>
<tr>
<td><strong>3</strong></td>
<td>Appoint an Inclusion Support Officer or Liaison Officer- may be a senior official from HR team. Larger establishment can have one each in different locations/branches. Such an officer is duly trained on inclusive practices and emergency management and to address requests for reasonable accommodation</td>
</tr>
<tr>
<td><strong>4</strong></td>
<td>Diversity and Inclusion Department/network is created with a responsible officials overseeing the network.</td>
</tr>
<tr>
<td><strong>5</strong></td>
<td>Sharing of inclusive practices (teams, departments, branches/ locations and within the establishment)</td>
</tr>
<tr>
<td><strong>6</strong></td>
<td>Team building activities, recreational sessions, feedback sessions with employees with disabilities</td>
</tr>
<tr>
<td><strong>7</strong></td>
<td>Employee counselling services on request of the employee or on recommendation of the Manager/ supervisor</td>
</tr>
</tbody>
</table>
# WORKPLACE INCLUSION CHECKLIST

<table>
<thead>
<tr>
<th>SI No</th>
<th>Areas of Focus</th>
<th>Yes/No</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Ensuring Inclusive Work culture</strong></td>
<td></td>
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<tr>
<td>8</td>
<td>All events, including retreats, trainings, celebrations are conducted on barrier free locations</td>
<td></td>
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<tr>
<td>9</td>
<td>Website of the establishment is accessible to persons with disabilities</td>
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</tr>
<tr>
<td>10</td>
<td>Employees with disabilities found at all levels of the establishment, including at the management and board level</td>
<td></td>
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<tr>
<td>11</td>
<td>Disability Awareness and sensitization programs conducted for all staff at regular intervals.</td>
<td></td>
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<tr>
<td>12</td>
<td>Grievance Resolution mechanism and Escalation procedures are created to resolve complaints/ issues</td>
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<tr>
<td>13</td>
<td>Effectiveness of inclusion policy and programs measured through surveys once a year and an action plan developed to remove barriers if any.</td>
<td></td>
</tr>
<tr>
<td>14</td>
<td>Universal Design principles applied at workplace settings to create inclusive workplace</td>
<td></td>
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<tr>
<td>15</td>
<td>Mechanisms to identify, check, remedy and prevent factors that undermine inclusion and to create monitors to see performance of the establishment in achieving inclusiveness at workplace</td>
<td></td>
</tr>
<tr>
<td>16</td>
<td>Leadership and commitment to achieve inclusion</td>
<td></td>
</tr>
</tbody>
</table>
### WORKPLACE INCLUSION CHECKLIST

<table>
<thead>
<tr>
<th>SI No</th>
<th>Areas of Focus</th>
<th>Yes/ No</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Accessibility features in Microsoft</td>
<td><a href="https://www.microsoft.com/en-in/windows/accessibility-features?r=1">Link</a></td>
</tr>
<tr>
<td>3</td>
<td><a href="https://www.microsoft.com/en-us/microsoft-teams/accessibility-closed-captions-transcriptions">Link</a></td>
<td></td>
</tr>
</tbody>
</table>
Model
Equal Opportunity Policy
(For a Private Establishment employing 20 or more employees)
Name of the Establishment: M/s ABC Ltd.

1. OVERVIEW
At ABC Ltd., we are committed to provide equal opportunities in employment and creating an inclusive workplace and work culture in which all employees are treated with respect and dignity and their contributions as a part of diverse workforce are valued and recognized.

At ABC Ltd., we will strive to ensure that our workforce is representative of all sections of the society. We believe that, by doing so, we would be better equipped to develop and deliver accessible and inclusive products and services. In this way, we hope to be able to meet the needs of our clients and customers better thus producing business excellence.

This Equal Opportunity Policy is in accordance with the provisions of The Rights of Persons with Disabilities Act, 2016 that we commit to implement not just to the letter but also to the spirit of the Act.

The CEO/ Managing Director has the overall responsibility for the effective operation of the Equal Opportunity Policy. Liaison Officer for Persons with Disabilities, shall be in charge for its implementation along with HR/Admin Heads.

2. POLICY STATEMENT (Rule 3 of RPD Rules 2017)
ABC Ltd. is committed to eliminating all forms of discrimination on the basis of disability (which may include direct discrimination, indirect discrimination or denial of reasonable accommodation), bullying or harassment of people with disabilities. In particular, the establishment is committed to:

(a) Comply with the provisions of the Rights of Persons with Disabilities Act 2016.
(b) Ensure equal opportunity in all aspects of employment.
(c) Creating and maintaining a non-discriminatory and inclusive work environment.

And to this end, ABC Ltd., will proactively work towards ensuring that at least 5% of its workforce is comprised of people with benchmark disability. It will ensure a robust career growth path for persons with disabilities and for those who acquire a disability during their employment tenure.

At ABC Ltd., we continuously strive to ensure that all our facilities, technologies, information and privileges are accessible to people with disabilities.

We encourage candidates with different disabilities to apply for different positions. Our decisions on employment, career progression, training or any other benefits are solely based on merit. We follow an inclusive evaluation process by ensuring that a person with disability is provided with suitable flexibility and accommodation that may be required so that the persons may be evaluated fairly. Any information shared by employee on disability or medical condition shall remain confidential.
If an employee acquires a disability during the employment tenure, the employee can return to work at the same rank as before. In case the employee is unable to perform the current job, the organization shall invest in re-skilling the employee for another position at the same rank or higher.

ABC Ltd. is committed to promoting awareness on equal opportunity and inclusion of people with disabilities among all employees by organizing training and sensitization programs and campaigns.

A copy of this equal opportunity policy shall be placed on the website of the establishment and shared with a new employee at the time of induction. Where possible it shall also be displayed at conspicuous spaces in the establishment.

3. SCOPE
The Policy covers all persons with disabilities who come in contact with ABC Ltd. whether as job applicants, employees – whether full or part time, interns, trainees, contractual employees, including temporary employees. The policy also covers those employees who acquire disability during their work tenure. The Policy applies to all aspects of employment, be it recruitment, training, working conditions, salaries, transfers, employee benefits and career advancement.

4. DEFINITIONS
The definitions and categories of disabilities shall be as per the Rights of Persons with Disabilities Act 2016 and Rules made thereunder.

5. FACILITIES AND AMENITIES:
Following facilities and amenities shall be provided to persons with disabilities to enable them to effectively discharge their duties in the establishment

5.1 Physical Infrastructure (Rule 8 & 15 of the RPWD Rules) ABC Ltd. aims to ensure that its physical infrastructure (buildings, furniture, facilities and services in the building/campus) adheres to the accessibility Standards given in The Harmonized Guidelines and Space Standards for Barrier Free Built Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016 (as updated from time to time) to ensure barrier free accessibility.

ABC LTD. also aims to revamp its existing buildings by March 2022, to ensure strict compliance with the Standards. Any new facility that is built or renovated or leased or rented shall be evaluated for compliance with accessibility Standards at different stages of the building construction. Any employee facing accessibility issues should report to the facilities team at their location or write to the Liaison Officer. The grievance may be escalated with Grievance Redressal Officer, if the same is not resolved.

5.2 Digital Infrastructure (Rule 8 & 15 of the RPWD Rules)
It is ABC Ltd. ‘s continuous endeavour to ensure that all our documents, communication and information technology systems adhere to the accessibility standards for Information and Communication Technology as given in the RPWD Rules 2017 i.e.:
5.2 Digital Infrastructure (Rule 8 & 15 of the RPWD Rules) It is ABC Ltd. ‘s continuous endeavour to ensure that all our documents, communication and information technology systems adhere to the accessibility standards for Information and Communication Technology as given in the RPWD Rules 2017 i.e.:

- **Website Standards:** As specified in the Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India.
- **Documents Standards:** Documents placed on website shall be in Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats

We shall ensure that only accessible technologies are procured. Any employee facing accessibility challenges can reach out to the local IT support team or write to Liaison Officer.

5.3 Transport Infrastructure (Rule 15 of the RPWD Rules) It is ABC Ltd’s continuous endeavor to ensure that its transport services are accessible to persons with disabilities. Standards prescribed under the Rule 15 of the RPWD Rules regarding Buses and for other modes of transport shall be complied with.

5.3 Accessibility of Services (Section 46 of RPDA 2016 and Rule 8 & 15 of the RPWD Rules) ABC Ltd. aims to ensure that its services & facilities open to the employees, customers, clients or general public are accessible to persons with disabilities. The company shall meet the standards in respect of accessibility in respect of other services and facilities not covered above as and when specified by the law and rules made thereunder.

5.4 Reasonable Accommodation (Rule 3 of RPD Rules 2017) ABC Ltd. shall make reasonable accommodations, whenever necessary, for employees or job applicants with disabilities, as per the RPWD Act. Such accommodation would be provided:

1) to ensure equal opportunity in the application and selection process,
2) to enable an employee with a disability to perform the essential functions of a job, and
3) to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

ABC Ltd. shall ensure that a person with disability is not compelled to pay (partly or fully) the costs incurred for reasonable accommodation. This shall be borne by the company.

ABC Ltd. has formulated Reasonable Accommodation Request Form and Reasonable Accommodation Guidelines in which the process for availing accommodations have been further detailed out. All documents concerning an employee’s reasonable accommodations request would be maintained in the employee’s confidential file, separate from the employee’s official personnel file.

5.5 Examples of reasonable accommodations may include (but not limited to):
(a) Return-to-work strategies can include bringing an employee back to work part time, work from home, allowing them to telecommute, modifying work schedules/tasks, and/or providing other workplace accommodations.
(b) Modifying assessment and training materials for promotional or career improvement programs;

(c) Communication modifications

   a. Audio amplification system, captions to videos, induction loop system, assistive
      listening devices and Sign Language interpreters for Deaf individuals or individuals
      who are hearing difficulties.
   b. Readers for blind people, people with low vision, or individuals with learning
      disabilities
   c. Large print or electronic documents accessible by screen reader
   d. Text-based communication for people with autism, people who have hearing or
      speech related disabilities
   e. Simple, direct language usage to help individuals with intellectual disabilities
   f. Increasing or dimming lighting at workplace to meet a specific need.
   g. Audio visual communications including for events, meetings, emergencies.

(d) Providing Job Coaches to help assist an individual with disability in learning
new job tasks or helping them complete their job tasks more proficiently.

(e) Modification in workplace rules/norms

   a. Making provision of a Quiet Room for short break / calming areas to allow
      individuals to get away from noisy areas.
   b. Allowing a person to sit on a stool
   c. Allowing desk eating breaks to someone with diabetes.
   d. Allowing frequent bathroom breaks
   e. Banning artificial scents in the workplace or simply ensuring scent free
      environments.
   f. Providing a parking/ storage facility and charging point to charge electronic
      assistive devices or mobility devices such as a wheelchair/cycles etc.
   g. Providing human assistance/ buddies where required.

(f) Acquiring or modifying equipment or devices, assistive technologies etc.

   a. Providing speech-to-text software.
   b. Providing computers, laptops, phones, screening reading software, scanners, braille note takers, induction loops or hearing enhancement
      systems and machines, assistive technologies etc. that enhance
      functional capabilities of employees with disabilities.
   c. Purchasing only accessible software that are used at work such as for
      accounting, human resources, logistics, travel, research etc.
   d. Purchasing ergonomic equipment that promotes occupational health.
   e. Allowing noise cancelling headphones for individuals with sensory or
      auditory processing disabilities.
   f. Providing wheelchairs, electric wheelchairs, other mobility equipment or
      assistive devices etc.
(g) Position restructuring
   a. Changing some of the less essential job tasks and shifting them to another position. This can include lifting or physically strenuous tasks for a position that is primarily administrative.
   b. Changing leave policies to meet specific needs such as for those receiving medical treatment, rehab therapies or recovering from an illness or injury.
   c. Exploring other less conventional workplace strategies to promote inclusion.

(h) Physical environment & transport
   a. Over and above meeting the accessibility requirements of built environment, websites, ICT, renovations in the building to make it accessible such as accessible entrance (no stairs, building a ramp, wider doors, automatic or push button doors, well-lit level passage, approach,)
   b. Accessible parking and or drop-off locations, adding colour contrast, providing lever type controls or handrails to washroom, widening the doors or adding a sensor enabled entrance door, etc.
   c. If transport is provided, provision of wheelchair accessible vans/bus that have good signage etc. shall also be made.

6. List of positions identified suitable for persons with disabilities (Rule 8 of RPD Rules 2017)
   In ABC Ltd., all positions are open for people with all types of disabilities. The hiring is purely based on merit and the candidates are evaluated based upon their skills and competence. Flexibility and accommodations shall be provided to persons with disabilities on an individual basis. However, an indicative list of positions where employees with disabilities are already working or that have been identified as most suitable is at given as Annexure A for easy reference.

7. MANNER OF SELECTION (Rule 8 of RPD Rules 2017)
   7a. Vacancy advertisement and application (Section 36 of RPDA 2016)
      i. Wherever possible, all vacancies will be advertised internally and externally.
      ii. Vacancies arising shall be notified / returns furnished to the special employment exchanges as per govt. guideline and where possible to disability organizations, colleges, polytechnics etc.
      iii. All vacancy advertisements shall include an appropriate short statement on equal opportunities for people with disabilities.
      iv. Selection criteria (job description and employee specification) will be kept under constant review to ensure that they are not discriminatory and that they relate purely to the skills needed for the job and nothing else.
      v. Application forms will be made available in alternate formats, based on request.
7b. Selection Process
i. Thought merit remains the prime focus, relaxation will be considered for people with disabilities on a case by case basis as per the reasonable accommodation policy.
ii. Persons with disabilities who need exemptions or reasonable accommodations for taking the test should contact the Liaison Officer.
iii. If a person with disability needs any specific reasonable accommodation for the interview she/he should write to the recruiter or the Liaison Officer.
iv. Each interviewer is mandated to record her/his comments on the candidate’s capability in the Interview Evaluation Form. Reasons for rejection must be objective and not related to the person’s disability.

v. Wherever possible, more than one person shall be involved in the selection interview and recruitment process, and all officials involved in the recruitment process should have received appropriate training on the topic of equal opportunities for people with disabilities.

7c. Pre-recruitment Training and Post-recruitment training (Rules 8 of RPD Rules 2017)
ABC Ltd. will endeavour to provide course materials meant for induction and training in accessible formats on request. The request for reasonable accommodation, such as assistive aids, accessible training venue, accessible materials, interpreter, scribe, etc. should be placed at least one week prior to the scheduled date of commencement of induction/training.

7d. Career Development
The company has an accessible and inclusive appraisal process. Any employee/ Manager requiring any accommodations for an appraisal process must place a request with the Liaison Officer at least two days in advance.

8. OTHER FACILITIES (Rules 8 of RPD Rules 2017)

8a. Disability Leave
An employee's request for extra leave, for a reason related to her/his disability, to a maximum of 8 days in a year will be treated as a request for reasonable accommodation and will be evaluated accordingly. ABC Ltd. provides an option of unpaid special leave for a maximum period of three months for employees with disabilities who plan to undergo medical treatment. The procedure for availing the leave is detailed out in the company's Leave Policy.

8b. Accessibility and accommodations during official travel etc.
For official travel (local, outstation and international), employees with disabilities will be provided accessible modes of transport. Air travel (in case road/train travel is inaccessible), accessible guest houses and hotels and allowing a personal attendant to travel along, will be provided, as per our reasonable accommodation guidelines. An employee can place a written request for this with the HR department.

8c. Employee Engagement and Social Inclusion
ABC Ltd. will endeavor to make all company events and meetings inclusive by ensuring that these are conducted at accessible venues with a provision of reasonable accommodation being available to employees with disabilities.
8d. Preference in transfer and posting
Persons with disabilities shall be ordinarily exempt from routine transfers and they would be retained at the place of their preferred choice where position exist.

8e. Preference in allotment of residential accommodation
Where residential accommodation is provided/ offered by the establishment, employees with disabilities will be given preference in allotment of residential accommodation. It will be ensured that the accommodation is accessible as per the standards on built environment and also meeting the specific needs of the employee, if any, as a reasonable accommodation.

9. GOVERNANCE

9a. Responsibility to comply
The Managing Director/ CEO / Head of Establishment shall be responsible for ensuring that the establishment operates in compliance with The RPWD Act, 2016 and to fulfil the terms of this Policy. The HR Head with help of Liaison officers takes a lead in implementing the policy and is responsible form planning, monitoring and reviewing its progress to ensure compliance with the Policy.

9b. Liaison Officer (Rule 8 of RPD Rules 2017)
As per the mandate of The RPWD Act, ABC Ltd. has appointed XYZ as a Liaison Officer who shall be responsible to look after the recruitment of persons with disabilities and for taking initiative and providing the requisite support needed to realize the goals of an inclusive and accessible workplace and reasonable accommodation.

The Liaison Officer is responsible for:
• Implementing the action plan for making the workplace and ICT systems accessible for people with disabilities by liaising with the various departments in the Organisation.
• Ensuring that all employees are aware of the Equal Opportunity Policy and know their duties and rights in relation to the Equal Employment Opportunity policy.
• Developing proactive strategies to prevent discrimination and harassment including conducting sensitization programs.

The Liaison Officer will share the quarterly progress report with the HR Head who would then present the progress report to the CEO/MD All employees have the responsibility to comply with the Equal Opportunity Policy. Managers and team members need to monitor the work environment to ensure that it is free from discrimination and harassment and encourages inclusion and respect for others.

All employees are encouraged to report any incidents of violation of this policy and Managers should act promptly when concerns arise or complaints are made.
10. GRIEVANCE REDRESSAL (Rule 3 of RPD Rules 2017)
An employee with disabilities, if feels discriminated against, on the grounds of disability in the establishment can raise the grievance with the Head of the Establishment or Grievance Redressal Officer if the issue has not been addressed at the level of the Liaison Officer. The establishment shall appoint a Grievance Redressal officer who would be a senior official not below the position of Head of Department for HR / Administration and who is trained in handling grievances related to disability discrimination and harassment.

If the head of the private establishment employing twenty or more persons receives a complaint from an aggrieved person regarding discrimination on the ground of disability, he shall -
(a) initiate action in accordance with the provisions of the Act; or
(b) inform the aggrieved person in writing as to how the impugned act or omission is a proportionate means of achieving a legitimate aim.

The Head of Establishment / Grievance Officer shall follow the procedure of Grievance redressal as outlined in the Guidelines for conducting the Enquiry.

The employee, where not satisfied, would be advised to escalate the grievance before the State Commissioner/ Chief Commissioner for persons with Disabilities.

11. MAINTENANCE OF RECORDS (Rule 9 of RPD Rules 2017)
ABC Ltd. shall collect and maintain data regarding employees with disabilities in relation to their employment, facilities provided and other necessary information as per The RPD Act. In particular, following information records shall be always maintained and produced for inspection on demand, or supplied to the authorities under this Act:

(a) the number of persons with disabilities who are employed and the date from when they are employed;
(b) the name, gender and address of persons with disabilities;
(c) the nature of disability of such persons;
(d) the nature of work being rendered by such employed person with disability; and
(e) the kind of facilities being provided to such persons with disabilities.

All employees will be asked to fill the Voluntary Disability Self Identification Form in order to give information regarding any disability that they may have. An employee can edit the information at any time during the tenure. An employee who acquires disability can also edit and update the form attaching a copy of the disability certificate where certified as a benchmark disability.

The information that an employee shares about her/his disability shall be kept confidential. It shall be maintained in a separate file and not in her/his personal file. Exceptions to the confidentiality clause:
i. Managers/Supervisors may be given information about an employee’s disability for allowing/providing any accommodations.
ii. Security personnel may be given information about an employee’s disability so as to facilitate obtaining any necessary support during an emergency.
iii. Government officials who are investigating the compliance with The RPWD Act may be given information about an employee’s disability.

12. AFFIRMATIVE ACTION (section 35 of RPDA 2016)
ABC Ltd., for the purpose of promoting equality of opportunity, seeks to increase the representation of people with disabilities to a level that at least 5% of its workforce consists of persons with disabilities. This shall be done by using suitable recruitment and outreach efforts. These include, but is not limited to:

- Utilizing incentives to private employers offered by the Govt. to increase representation of persons with benchmark disabilities in workforce.
- Participation in job fairs, training and scholarship programs and organising special recruitment drives and training and employment of people with disabilities who have high support needs.
- A certain percentage of the CSR budget will be allocated for supporting disability inclusion programmes.

13. SMALLER ESTABLISHMENTS (Rule 8(4) of RPD Rules 2017)
Smaller Establishments employing less than 20 employees shall also publish an equal opportunity which shall contain facilities and amenities to be provided to the persons with disabilities to enable them to effectively discharge their duties in the establishment such as accessibility of infrastructure, reasonable accommodation, and such other need based requirement that promotes the inclusion of persons with disabilities in the workplace.
EQUAL OPPORTUNITY POLICY FOR
PERSONS WITH DISABILITIES 2020

As required under Section 21(1) of the
Rights of Persons with Disabilities (RPwD) Act, 2016

1. INTRODUCTION

Brief about the Organization’s work and its commitment to provide equal opportunities to all sections of the community particularly persons with disabilities.

Section 21 of the Rights of Persons with Disabilities Act 2016 mandates: (1) Every establishment shall notify Equal Opportunity Policy detailing measures proposed to be taken by it in pursuance of the provisions of chapter IV in manner as prescribed the central govt. (2) Every establishment shall register a copy of the said policy with the Chief Commissioner or the State Commissioner, as the case may be.

Therefore, in pursuance of the Section 21 of the of the Rights of Persons with Disabilities Act 2016 and Rule 8, 9 and 10 under Chapter-IV (Employment) of the Rights of Persons with Disabilities Rules 2017, the Organisation __________, frames the present Equal Opportunity Policy for Persons with Disabilities. A copy of this policy has been registered with the Chief Commissioner / State Commissioner - for Persons with Disabilities, as the case may be, and the Registration No. is ____________________.

2. PURPOSE

The Equal Opportunity Policy is to provide equal opportunities to the Persons with disabilities without any discrimination, on the grounds of disability, age, colour, marital status, physical ability, race, religion, sex, sexual orientation or any other diversity relevant for the purpose.

Based on the above considerations, the organization shall strive to maintain a conducive working environment. This Policy is subject to applicable regulations, qualifications, and merit of the individuals concerned. This Policy shall be consistently applied throughout the period of employment of the individual from the recruitment process until superannuation (for employees).

3. DEFINITION

The definitions of different terms used in this Policy shall be as per the Rights of Persons with Disabilities Act, 2016.

4. SCOPE & COMMITMENT

This Policy shall cover all persons with disabilities, who come under the administrative control of the organization. This would include employees (regular, ad hoc, part time, contractual, and temporary) and interns, trainees or students who may have a disability or who may acquire disability during their engagement with the organization.

This policy also applies to all aspects of employment, be it recruitment, training, working conditions, salary, transfers, employment benefits and career advancement etc.
The Organisation is committed to implement the provisions of The Rights of Persons with Disabilities Act and will strive to provide equal opportunities to the Persons with disabilities without any discrimination.

5. RIGHTS AND ENTITLEMENTS

5.1 Equality & Non-discrimination (Section 3 of RPWD Act)
(a) The organization shall ensure that the persons with disabilities enjoy the right to equality, life with dignity and respect for their integrity equally with others.
(b) The organization shall take steps to utilize the capacity of persons with disability by providing appropriate environment.
(c) It shall make sure that no persons with any kind of disabilities shall be discriminated on the ground of disability, unless it is shown that the impugned act or omission is a proportionate means of achieving a legitimate aim.
(d) No person shall be deprived of his or her personal liberty on the ground of disability.
(e) The organization shall take necessary steps to ensure reasonable accommodation for persons with disabilities.
(f) It shall take measures to protect persons with disability from being subjected to torture, cruel, inhuman or degrading treatment.

5.2 Reasonable Accommodation (Rule 3 of RPD Rules 2017)
The establishment shall make reasonable accommodations, whenever necessary, for employees or job applicants with disabilities, as per the RPWD Act.

Such accommodation would be provided:
1) to ensure equal opportunity in the application and selection process,
2) to enable an employee with a disability to perform the essential functions of a job, and
3) to enable an employee with a disability to enjoy the same benefits and privileges of employment as non-disabled employees.

The establishment shall ensure that a person with disability is not compelled to pay (partly or fully) the costs incurred for reasonable accommodation. This shall be borne by the establishment.

The establishment has formulated Reasonable Accommodation Request Form and Reasonable Accommodation Guidelines in which the process for availing accommodations have been further detailed out. The reasonable accommodation shall be provided to a candidate appearing in the recruitment process as well as after joining. All documents concerning an employee’s reasonable accommodations request would be maintained in the employee’s confidential file, separate from the employee’s official personnel file.

5.3 Examples of reasonable accommodations may include (but not limited to):
(a) Modifying assessment protocols and training materials for promotional or career improvement programs; providing relaxations in skill tests as available to persons with benchmark disabilities.
(b) Communication modifications:
   a. Providing Audio amplification system, captions to videos, induction loop system, assistive listening devices and Sign Language interpreters for Deaf individuals or individuals who are hearing difficulties.
   b. Readers for blind people, people with low vision, or individuals with learning disabilities
   c. Large print or electronic documents accessible by screen reader
   d. Text-based communication for people with autism, people who have hearing or speech related disabilities
   e. Simple, direct language usage to help individuals with intellectual disabilities
   f. Increasing or dimming lighting at workplace to meet a specific need.
   g. Audio visual communications including for events, meetings, emergencies.

(c) Providing Job Coaches to help assist an individual with disability in learning new job tasks or helping them complete their job tasks more proficiently.

(d) Return-to-work strategies can include bringing an employee back to work parttime, work from home, allowing them to telecommute, modifying work schedules/tasks, and/or providing other workplace accommodations.

(e) Modification in workplace rules/norms
   a. Making provision of a Quiet Room for short break / calming areas to allow individuals to get away from noisy areas.
   b. Allowing a person to sit.
   c. Allowing desk eating breaks to someone with diabetes.
   d. Allowing frequent bathroom breaks.
   e. Banning artificial scents in the workplace or simply ensuring scent free environments.
   f. Providing a parking/ storage facility and charging point to charge electronic assistive devices or mobility devices such as a wheelchair/cycles etc.
   g. Providing human assistance/ buddies where required.

(f) Acquiring or modifying equipment or devices, assistive technologies etc.
   a. Providing speech-to-text software.
   b. Providing computers, laptops, phones, screening reading software, scanners, braille note takers, induction loops or hearing enhancement systems and machines, assistive technologies etc. that enhance functional capabilities of employees with disabilities.
   c. Purchasing only accessible software that are used at work such as for accounting, human resources, logistics, travel, research etc.
   d. Purchasing ergonomic equipment that promotes occupational health.
   e. Allowing noise cancelling headphones for individuals with sensory or auditory processing disabilities.
   f. Providing wheelchairs, electric wheelchairs, other mobility equipment or assistive devices etc.
(g) Position restructuring
   a. Changing some of the less essential job tasks and shifting them to another position. This can include lifting or physically strenuous tasks for a position that is primarily administrative.
   b. Changing leave policies to meet specific needs such as for those receiving medical treatment, rehab therapies or recovering from an illness or injury.
   c. Exploring other less conventional workplace strategies to promote inclusion.

5.4 Protection from Abuse, Violence, and Exploitation (Section 7 of RPWD Act)
   The organization shall take following measures to protect persons with disabilities against abuse, violence, and exploitation:
   (a) Create awareness and make available information among the public.
   (b) Take cognizance and provide available legal protection to the persons with disabilities in matters relating to abuse, violence and exploitation;

6. EDUCATION (Section 16 of RPWD Act)
   (This section is applicable only to Educational and Training institutions or establishments engaged in education or capacity development)

6.1 To provide inclusive education to the students with disabilities the organization shall-
   (a) Admit the students without discrimination and provide education and opportunities for sports and recreation activities equally with others;
   (b) Detect specific learning disabilities in students (in terms of course curriculum) at the earliest and take suitable pedagogical and other measures to overcome them;
   (c) Make the entire campus barrier free so that services become accessible to the persons with disabilities;
   (d) Provide necessary support, individual or otherwise, in creating an environment that would nurture academic and professional potentialities at par;
   (e) Ensure that the education to persons who are blind or deaf or both is imparted in the most appropriate languages and modes and means of communication;
   (f) Monitor participation, progress in terms of attainment levels and completion of education in respect of every student with disability;
   (g) Provide transportation facilities to the students with disabilities and their attendants.
   (h) Promote teaching and research in disability studies including establishment of study centres / departments for such studies with due approval of UGC/MHRD/AICTE.

6.2 Specific Measures to promote and Facilitate Inclusive Education (Section 17 of RWPWD Act)
   The organization shall take the following measures for the purpose of the facilitating inclusive education:
(a) Train and employ teachers, including teachers with disability, who are qualified in sign language and Braille and also teachers who are trained in teaching students with multiple / intellectual disability;
(b) Train professionals and staff to support inclusive education at all levels of education;
(c) Establish MoU with the institutions from which adequate number of resources could be drawn for the support of all levels of education;
(d) Promote the use of appropriate augmentative and alternative modes including means and formats of communication, Braille and sign language to supplement the use of one’s own speech to fulfil the daily communication needs of persons with speech, communication or language disabilities and enables them to participate and contribute to their community and society;
(e) Provide books, other learning materials and appropriate assistive devices to students with benchmark disabilities up to the completion of the degree;
(f) Assist / arrange to obtain scholarships in appropriate cases to students with benchmark disability;
(g) Make suitable modifications in the curriculum and examination system to meet the needs of students with disabilities such as extra time for completion of examination paper, facility of scribe or amanuensis, exemption from second and third language courses;
(h) Promote research to improve learning; and
(i) Any other measures, as may be required.

6.3 Special Provisions for Persons with Benchmark Disabilities (Section 32 of RPDA2016)

Reservation in higher educational institutions:
(a) The organization shall reserve 5% seats for persons with benchmark disabilities as notified by the Government of India from time to time.
(b) The persons with benchmark disabilities shall be given an upper age relaxation of five years for admission for higher education.

The Organisation shall follow the above guidelines (as amended from time to time) for conduct of all kinds of written examinations for persons with benchmark disabilities.

7. SKILL DEVELOPMENT (Section 19 of RPDA2016) This section is applicable only to institutions of learning or engaged in education or capacity development)

7.1 Vocational training and self-employment: (Section 19 of RPDA2016)
The Organization shall extend the following services:
(a) Formulation of vocational training schemes and programmes for the students and employees with disabilities;
(b) Inclusion of person with disability in all vocational and skill development training activities within the ambit of the organization;
(c) Providing platform for marketing of the products made by students with disability;
(d) Assist / arrange to obtain loan at subsidized interest rates for the students with disabilities to initiate their own economic venture (terms & conditions apply);
(e) Maintenance of disaggregated data on the progress made in the skill training and self – employment.

8. EMPLOYMENT
8.1 Non-discrimination in employment (section 20 of RPDA2016)
(a) The organization shall not discriminate against any person with disability in any matter relating to employment.
(b) The organization shall provide reasonable accommodation and appropriate barrier free and conducive environment to the employees with disabilities;
(c) No promotion shall be denied to a person on the ground of disability;
(d) The organization shall not dispense with or reduce in rank, an employee who acquires a disability during his or her service;

   (i) Provided that, if an employee after acquiring disability is not suitable for the post he/she was holding, shall be shifted to some other post with the same pay scale and service benefits:
   (ii) Provided further that if it is not possible to adjust the employee against any post, he/she may be kept on a supernumerary post until a suitable post is available or he/she attains the age of superannuation, whichever is earlier.

(e) The organization may frame policies for posting / transfer of employees with disabilities subject to the Govt of India guidelines.
(f) The organization shall organize various in-house programmes such as orientation, refresher course and other programmes as may be deemed appropriate and suitable for inclusion of the employees with disabilities.

8.2 List of posts identified suitable for persons with disabilities (Section 33 of RPDA2016)

The organization shall follow the List of posts identified for persons with disabilities and published by Deptt of Empowerment of Persons with Disabilities. In addition, a list of identified jobs that are currently held by people with disabilities or can be easily performed has been identified and prepared and the same is placed at Annexure – B

8.3 The manner of selection of persons with disabilities for various posts
Consolidated Instructions on Reservation for the Persons with Benchmark Disabilities issued vide No. 36035/02/2017-Estt (Res) dated 15 January 2018 as revised from time to time, shall be followed]
(a) The Organization's recruitment rules provide the sources and Modes of Recruitment. Wherever applicable, it notifies vacancies to Employment Exchanges in terms of Employment Exchanges (Compulsory Notification of Vacancies) Act, 1959 and in National/Regional dailies, Employment news and Company website.

(b) Reservation, relaxation and concessions are provided to Persons with Benchmark Disability (PwBD) candidates as per Govt of India directives/instructions.

(c) All vacancy advertisement shall include an appropriate short statement on equal opportunities for persons with disabilities.

(d) The organization shall facilitate ease of taking examination to candidates with disabilities by providing barrier free environment at exam/test center and shall provide scribes wherever admissible.

8.4 Facilities and amenities provided to the Person with Disabilities to enable them to effectively discharge their duties in the establishment [As per DoPT Memorandum No.36035/3/2013-Estt.(Res) dated 31 March 2014]

8.5 Post recruitment and Pre promotion Training DoPT Memorandum No.36035/3/2013-Estt.(Res) dated 31 March 2014]

Post recruitment induction training and job specific pre promotion training to Persons with Disabilities shall continue to be imparted along with other employees. The employees with disability shall be placed with an experienced employee for at least one month on assuming responsibility of a post. This would help employee with disability to pick up the skills required to perform the job and the adaptations that may be required in individual cases.


(a) As far as possible, the Persons with Disabilities may be exempted from the rotational transfer policy/transfer.

(b) Further, preference shall be given while considering request for placement/transfer from persons with disabilities/differently able employees and also employees whose spouse/children have special needs and this practice shall continue.

(c) Persons with disabilities across all grades and employee who has a disabled spouse/child, may be provided preference in place of posting at the time of normal transfer/transfer on promotion subject to the administrative constraints, choices exercised by employee at the time of consideration and recruitment for the post for which employee with disability has been appointed vis-à-vis availability of such vacancies/requirement in the new place of posting.

(a) Employees with disabilities shall be entitled to Special casual leave of not more than 10 days in a calendar year subject to exigencies of work for participating in conference/seminars/training/workshop on disability and development related programmes organized at National and State Level agencies specified by the Ministry of Social Justice and Empowerment.
(b) Additional benefit of 4(four) days will be granted in the form of Special Casual leave in a calendar year for specific requirements relating to the disability of the employee.
(c) Summary of the 14 Additional Leaves admissible/provisioned for employee with disabilities above is as below:

<table>
<thead>
<tr>
<th>Special Leave for employees with disabilities</th>
<th>Number in Days</th>
<th>Purpose</th>
</tr>
</thead>
<tbody>
<tr>
<td>Special Casual Leave</td>
<td>10</td>
<td>For participating in conference / seminars / training / workshop on disability and development related programmes</td>
</tr>
<tr>
<td>Special Leave–PwD</td>
<td>D4</td>
<td>For specific requirements relating to the disability of the employee.</td>
</tr>
</tbody>
</table>

(d) Special Leave will be credited in advance to all PWD employees at the beginning of the year w.e.f. 01st January every year and unutilized special leave at the end of the year will lapse. The special leave for all practical purposes will be treated like CL.

8.8 Travelling Allowance in respect of Attendant/Escort for accompanying an Employee with Disabilities on travel during Tour/Training. [Ref. Ministry of Finance, Department of Expenditure OM no. 19030/3/2013-E.IV dated 17.02.2015]

(a) The Organization shall allow Travelling Allowance (Journey Fare only) in respect of the Attendant/Escort for accompanying an employee with disabilities during travel while on tour/training. Mode and class of the Attendant/Escort shall be same as per the eligibility of employee.

(b) The facility of Travelling Allowance for the Attendant/Escort would only be admissible to those employees with Disabilities, wherein it is certified by the competent Medical Authority of the designated Hospital /state government and in addition the HoP/HoD jointly certify that such a person compulsorily requires assistance of another person for travel.
The necessary certificate is to be obtained from the medical authority or any other notified competent authority to issue such a certificate under the Directorate of Medical & Health Services of the state/district or Head of Department of a Government Civil Hospital designated for the type/form of disability of the employee.

**8.9 Transport Allowance @ double the normal rates to Central Govt. Employees**  
(Ref Deptt of Expenditure Memo No. 20/02/16/E-II(B) dt 17.01.2017; Memo No. 21-1/2011/E-II(B) dt 05.08.2013)

As per extant Government of India guidelines, Transport Allowance to central Govt. employees with disabilities is provided at double the normal rate.

**8.10 Provision for aids/assistive devices**  

The persons with disabilities could perform their duties efficiently if they are provided with aids and appliances which are suitable to their needs. Employees with disabilities shall be allowed reimbursement towards expenses incurred by them towards purchase/replacement/repair/adjustment of artificial limbs/appliances for self and/or dependent family members and reimbursement towards Low Vision Aids for visually challenged employees and/or their dependents and Hearing Aid/Hearing aids with battery (for the initial purchase only) for hearing impaired employees and/or their dependents. The organization shall assist the employees with disabilities by providing them hi-tech/latest technology led assistive devices, special furniture, wheelchairs (motorized if required by the employee), software, scanners, computer and other hardware etc. in accordance with their requirement, which would improve their efficiency. The limit of reimbursement would be allowed as per the rates of aids/assistive devices as approved by the Central Government Health Scheme.

A review exercise shall be carried out by the department every three years to check the availability or need for introduction of enhanced/upgraded versions of such devices/software etc. The organisation shall utilize its existing budget provisions for providing these facilities to employees with disabilities.

**8.11 Preference in allotment of Residential accommodation**  

The organization shall give preference to the person with disabilities for providing them accessible accommodation, where it is offered to employees. The accommodation, wherever required modification in bathroom, toilet, gates etc. may be carried out in allotted accommodation to address the needs of the employee with disabilities and employees whose spouse/children have special needs, subject to accessibility guidelines.

To the extent possible persons with disabilities may be preferred for allotment of ground floor accommodation, subject to eligibility and availability.
8.12 Maintenance of Records (Section 22 of RPDA2016 & Rule 9 & 10 of RPDRules2017)

The organization shall maintain records of the persons with disability in relation to the matter of employment, facilities provided and other necessary information in compliance containing the following particulars:

(a) the number of persons with disabilities who are employed and the date from when they are employed;
(b) the name, gender and address of persons with disabilities;
(c) the nature of disability of such persons;
(d) the nature of work being rendered by such employed person with disability;
(e) the kind of facilities being provided to such persons with disabilities.

Such records maintained by the organization shall be open to inspection on demand at all reasonable hours by such persons as may be authorized or by the competent authority and the organization shall supply such information which may be required for the purpose of ascertaining whether the provisions have been complied with.


Liaison Officer shall be appointed by the organization to look after recruitment & reservations matters relating to persons with benchmark disabilities who shall ensure compliance of guidelines/instructions issued for Persons with benchmark disabilities also look after the issues relating to providing of facilities and amenities for the persons with disabilities. The updated contact details of Liaison Officers shall continue to be displayed on organization’s website and are also placed as Annexure A to this policy.

9. GRIEVANCE REDRESSAL OFFICER (Section 23 of RPDA 2016 & Rule 10 of RPD Rules2017)

The organization shall appoint an officer not below the rank of a Gazetted Officer as Grievance Redressal Officer and immediately inform the Chief Commissioner State Commissioner for Persons with Disabilities, as the case may be. Provided that where it is not possible to appoint any Gazetted Officer, the establishment may appoint the senior most Officer in the office as a Grievance Redressal Officer. The contact details of current Grievance Redressal Officer shall continue to be displayed on organization’s website and are also placed as Annexure A to this policy.

9.1 The Duties and Responsibilities of the Grievance Redressal Officer
(a) Receive, register and investigate the complaints/ grievances.
(b) Take up the matter with the establishment for corrective action to address grievances of persons with benchmark disabilities;
(c) To maintain a register of complaints in the manner as may be prescribed by the Central Government as per Annexure C.
(d) To inquire into the complaint/grievance within two weeks of its registration.
(e) If the aggrieved person is not satisfied with the action taken on his or her complaint, he or she may approach the District- Level Committee on disability;
(f) Prepare and Implement an action plan and developing proactive strategies to prevent discrimination and harassment;

(g) Ensuring employees, students and other stakeholders are aware of the Equal Opportunity Policy;

(h) Share the quarterly report with the designated authority in the organization.

(i) Creating an environment where all employees are encouraged to report any incidents of violation of rights of the persons with disabilities to the concern authority.

(j) If the aggrieved person is not satisfied with the action taken on his or her complaint, advise him the next course of action i.e. appeal before the District-Level Committee on disability appointed by the State under section 72 of RPDA 2016

10. SOCIAL SECURITY, HEALTH, CULTURE & RECREATION & SPORTS ACTIVITIES (Section 24,25,29 & 30 of RPDA 2016)

- Social Security will be provided as per the rules of Government of India, applicable to the organization.
- Health care services/ facilities will be provided as per the rules of Government of India, applicable to the organization and there shall be no discrimination.
- Culture and Recreation services would include facilities, support and sponsorship to pursue their interest and talents. The organization, within the limit of its economic capacity, would work to develop technology, assistive devices, equipment to facilitate, and inclusion of persons with disabilities in recreational activities.
- In Sports and other Activities, the organization, within the limit of its economic capacity, shall take following steps:
  a) It will take measures to ensure effective participation of persons with disabilities in sports activities;
  b) It shall accord due recognition to the rights of persons with disabilities and shall make due provisions for promotion and development of their sporting talents;
  c) without prejudice to the provisions mentioned under (a) & (b) above, the competent authority and the sport’s authority shall take measures to

(i) restructure courses and programmes to ensure access, inclusion and participation of persons with disabilities in all sporting activities;
(ii) redesign and support infrastructure facilities of all sports activities for persons with disabilities;
(iii) develop technology to enhance potential, talent, capacity and ability in sports activities of all persons with disabilities;
(iv) provide multi-sensory essentials and features in all sporting activities to ensure effective participation of all persons with disabilities;
(v) allocate funds for development of sport facilities for training of persons with disabilities;
(vi) promote and organize disability specific sport events for persons with disabilities and also facilitate awards to the winners and other participants of such sporting events.
11. Special Provisions for Persons with Disabilities with High Support Needs (Section 38 of RPDA 2016)

(a) The organization shall make provisions for providing appropriate support to any person with benchmark disability who considers himself/herself to be in need of high support; or any person or organization on his or her behalf, may apply to the authority to be notified by the appropriate Government, requesting to provide high support.
(b) On receipt of an application, the designated authority shall refer it to an Assessment Board consisting of such members as may be prescribed by the concerned authority.
(c) The Assessment Board shall assess the case referred to it in such manner as may be prescribed by the Central Government, and shall send a report to the designated authority (of the organization) certifying the need of high support and its nature.
(d) On receipt of a report, the designated authority shall take steps to provide support in accordance with the report subject to relevant schemes and orders of the appropriate Government in this behalf.

12. Awareness Campaign (Section 39 of RPDA 2016)

(a) The organization shall conduct, encourage, support, or promote awareness campaigns and sensitization programmes to ensure that the rights of the persons with disabilities provided under this Act are protected.
(b) The programmes and campaigns specified shall also:
   (i) Promote values of inclusion, tolerance, empathy and respect for diversity;
   (ii) Advance recognition of the skills, merits and abilities of persons with disabilities and of their contributions to the workforce and professional front;
   (iii) Provide orientation and sensitization in the organization and professional training level on the human condition of disability and the rights of persons with disabilities;
   (iv) Provide orientation and sensitization on disabling conditions and rights of persons with disabilities to employers, administrators, co-workers and among the students;
   (v) Make efforts so that the rights of persons with disabilities are included in the curriculum.

13. Access to Transport (Section 41 of RPDA 2016)

The organization shall take suitable measures to provide accessible and inclusive transport facilities and related infrastructure for persons with disabilities.


The organization shall take measures to ensure that —
   a) All contents available in audio, print and electronic media are in accessible format;
   b) Persons with disabilities have access to electronic media by providing audio description, sign language interpretation and close captioning;
   c) Electronic goods and equipment which are meant for everyday use are available in universal design.
15. Mandatory Observance of Accessibility Norms (Section 44 of RPDA 2016 and Rule 15 of RPD Rules 2017)

15.1 Physical Infrastructure: The organization shall ensure that all physical infrastructures including buildings, furniture, facilities and services in the building/campus are as per the accessibility Standards given in the Harmonized Guidelines and Space Standards for Barrier Free Environment for Persons with Disabilities and Elderly Persons, 2016 and the National Building Code, 2016.

15.2 Digital Infrastructure: The organization shall follow the Standards for Information and Communication Technology as given in the Rights of Persons with Disabilities Rules, 2017, such as
   a) Website Standards: Guidelines for Indian Government Websites (GIGW), as adopted by Department of Administrative Reforms and Public Grievances, Government of India.
   b) Documents Standards: Electronic Publication (ePUB) or Optical Character Reader (OCR) based pdf formats.

16. Social Audit (Section 48 of RPDA)
   The organization shall undertake social audit from the beneficiaries involving persons with disabilities to ensure that the facilities do not have an adverse impact upon the persons with disabilities and meet their requirements and concerns.

17. Revisions to this policy.
   The policy will be timely updated for the contact details of the Grievance Redressal Officers, Liaison Officer etc. and the policy shall be reviewed every three years or early, if there are changes necessitated due to progressive changes in disability law, rules, regulations or policies.