



**National
Lottery**

Reasonable Accommodation Policy



Contents

Purpose	4
Scope	4
Approach	4
What is Reasonable Accommodation?	4
What Accommodation can be offered?	5
Our Legal Obligation	5
1. Employment Equality Acts 1998 – 2015	5
2. EU Employment Equality Directive	6
3. Disability Act 2005	6
Prospective Employees	6
Current Employees	6
What is a Reasonable Accommodation Passport?	7
Guiding Principles for Dialogue & Implementation	8
Other Relevant Policies	9
Useful Contacts	10
Concerns and Queries	10
Appendix A – Reasonable Accommodation Passport	11

Purpose

The purpose of this policy is to outline the Company's policy & procedure in relation to reasonable accommodations for Premier Lotteries Ireland (PLI) employees and prospective employees with disabilities. The objective of this policy is to ensure that there is equal opportunity for all current and prospective employees in PLI.

Scope

The policy applies to all current and prospective employees of PLI with a disability who wish to avail of reasonable accommodation.

Approach

At PLI, we strive to create a workplace that provides equal opportunity to all current and prospective employees. We want to ensure that all staff members feel protected when they share their disability with the company and are given the rightful opportunities to access employment, advance in their career and/or undergo training. PLI will aim to reasonably accommodate all employees where possible, assessing each request on a case-by-case basis to ensure it is feasible.

What is Reasonable Accommodation?

Reasonable accommodation is any change to a job or a work environment that is needed to enable a person with a disability to apply, to perform and to advance in job functions, or undertake training. Reasonable accommodation is aimed at any employee with a disability. The right to reasonable accommodation extends to all work-related activities covered by EU law, from the job application process through to end of employment and includes working conditions.

If you have a disability and believe you need adjustments to your job or workplace, you can request reasonable accommodation. Once the request is received, PLI will review and aim to provide any appropriate reasonable accommodations once they are feasible for the requirements of the business. Reasonable accommodation are changes that are put in place so that the employee can perform their job to the best of their ability.

In considering the appropriate measures PLI will explore practical changes that can be introduced to support an employee with a disability unless this would give rise to a disproportionate burden for

the Company. A disproportionate burden may include one's ability to deliver in role, impact on team, and/or impact on business.

What Accommodation can be offered?

The main types of reasonable accommodation include technical solutions, physical solutions, flexible working arrangements, training measures, awareness raising measures, and changes to the task where possible. However, each employee will have their own individual needs depending on their disability. Hence, the company will be guided by the employee to co-identify the reasonable accommodation that may be required for the employee to thrive in the business. This can be done through completing the Reasonable Accommodation Passport which is explained in a later section.

Our Legal Obligation

PLI has a legal obligation as set out under the Employment Equality Acts, Disability Act, and the EU Employment Equality Directive as listed below:

1. Employment Equality Acts 1998 – 2015

The Employment Equality Acts (EEA) obliges employers to make a reasonable accommodation for people with disabilities. An employer must take 'appropriate measures' to meet the needs of disabled people in the workforce. This means they must make arrangements that will enable a person who has a disability to:

- have equal opportunities when applying for a role
- be treated comparably to colleagues
- have equal opportunities for promotion
- undertake training

The EEA defines a disability as:

- The total or partial absence of a person's bodily or mental functions, including the absence of a part of a person's body
- The presence in the body of organisms causing, or likely to cause, chronic disease or illness
- The malfunction, malformation, or disfigurement of a part of a person's body

- A condition or malfunction which results in a person learning differently from a person without the condition or malfunction
- A condition, disease or illness which affects a person's thought processes, perception of reality, emotions or judgement or which results in disturbed behaviour.

2. EU Employment Equality Directive

Employers are required to provide reasonable accommodation to employees with disabilities, to the extent that doing so would not impose a disproportionate burden to the organisation.

3. Disability Act 2005

Defines disability as: "a substantial restriction in the capacity of the person to carry on a profession, business or occupation in the State or to participate in social or cultural life in the State by reason of an enduring physical, sensory, mental health or intellectual impairment."

Prospective Employees

- **Job Application** - Individuals who are interested in applying for a job opportunity in PLI can request for reasonable accommodation throughout the job application process.
- **Pre-employment Medical** – Prior to a job offer, all candidates will be required to undergo a pre-employment medical. All candidates are encouraged to share their disability where applicable during the pre-employment medical so PLI can assist with assessing what adjustments are required in the workplace to support candidates.

Current Employees

1. Employees who are interested in requesting reasonable accommodation should complete the Reasonable Accommodation Passport (see Appendix A) together with their Line Manager and HR.
 - a. PLI will obtain independent medical advice, while ensuring that the medical professional has all relevant information to carry out an assessment of the role.

- b. If a decision is made by PLI to not reasonably accommodate the employee, the company will ensure there is a valid assessment of the company's own resources and an exploration of the different supports available for said employee before the decision is made to not reasonably accommodate the worker.
2. The agreed accommodations within the passport will then be completed by the relevant owners as specified in each Reasonable Accommodation Passport.
3. The employee must then upload their completed Reasonable Accommodation Passport to their profile on Personio. This will be visible to the employee, HR, their Line Manager, and any future Line Manager. This will help to support the employee in retaining any agreed reasonable accommodations if their Line Manager changes.
4. Employees are responsible for initiating any future reviews of their Reasonable Accommodation Passport with their line manager and HR should their circumstances change.

What is a Reasonable Accommodation Passport?

Reasonable Accommodation Passports are designed for employees with a disability who require workplace adjustments or accommodations. It is a written record of accommodations or workplace adjustments that have been agreed between the employee and their employer.

They are 'live' confidential documents agreed between an employee and their employer about changes to work, with a built-in review period to ensure they reflect the current situation for the employee in the workplace. It will ensure reasonable accommodations are put in place and kept up to date, in line with changes in job role or in the employee's needs. For some individuals who have fluctuating needs, additional steps can be set out regarding any short-term flexibility required within the overall reasonable accommodation passport framework. A passport is not legally binding and is not intended to impact employment rights but rather act as a memorandum of understanding between employee and employer.

The Reasonable Accommodation Passport allows the employee, to:

- explain the impact of their working conditions on them, given their personal circumstances
- explain the barriers that they encounter that may stop them participating fully at work

- suggest adjustments that they think will make it easier for them to fully participate
- review the effectiveness of accommodations provided and the ongoing impact this has on their work
- explain any change to their health or circumstances.
- feel reassured that their manager will know what to do if they become unwell at work, when to contact emergency services and who to contact if necessary
- know how and when their manager will keep in touch should they be absent from work due to their disability

The passport's purpose is to:

- make sure that both the employee and employer are clear about what accommodations have been agreed and hold a record of these accommodations
- reduce the need to reassess and renegotiate accommodations every time an employee changes jobs, is relocated or is assigned a new manager
- provide an employee and employer with the basis for future conversations about accommodations.

Guiding Principles for Dialogue & Implementation

Completing a Reasonable Accommodation Passport involves the individual employee requesting a meeting with their line manager and HR, which should take place in a quiet and confidential space. It is important that the line manager and HR create an open and supportive environment where employees feel they can share that they have a disability and any adjustments from which they might benefit. An employee's decision to talk about the Passport may require courage and will be treated sensitively and respectfully at all times. Below are some guidelines for line managers and HR when having these discussions:

- Approach the treatment of the information with an open mind and in a positive and constructive manner.
- Acknowledge the challenge of sharing their disability in this work environment. Do not let fear of saying the wrong thing overtake your ability to support the person.

- Actively listen to what the individual has to say. It is important to follow the persons lead and the language they use.
- Give time to the person to explain their disability to you as they may be nervous about confiding such personal information and may be wary of a negative reaction.
- Use the Passport to identify the employee's workplace accommodation needs by:
 - Involving the employee who has the disability in every step of the process.
 - Using job descriptions and job profiles to analyse essential functions of the job.
 - Consulting with the individual to ascertain the precise job-related functional barriers and how these could be overcome with potential accommodations e.g. if the individual has hearing loss – they might prefer email and video call to be the primary method of communication and with captioning etc.
 - Exploring ways of providing workplace accommodations.
 - Deciding if and how colleagues who may be directly impacted by any of the proposed accommodations will be informed.

Important things to remember:

- Confidentiality of information shared should be protected at all times.
- There is no obligation on individuals to share information. Therefore, they might not have spoken to anyone about their disability prior to their interaction with you. It is important that a welcoming culture be created at the earliest stage so that employees feel confident in sharing this information.
- Accommodations selected should be effective, reliable, easy to use, and readily available for the employee needing the accommodation.
- Implementation and annual reviews of any agreed reasonable accommodations are key to ensuring the Passport is having the intended impact.

Other Relevant Policies

Employees are advised to read these relevant policies:

- Employee Assistance Policy
- Equality, Diversity & Inclusion Policy
- Hybrid Working Policy
- Dignity & Mutual Respect Policy
- Recruitment Policy
- Learning & Development Policy

Concerns and Queries

PLI are committed to considering all applications for reasonable accommodation fairly and will review all requests while remaining conscious of business requirements. If you experience issues in receiving reasonable accommodation as a job candidate or a current employee, please raise the matter with HR. If you cannot resolve the issue directly with PLI, you can make a formal complaint to the Workplace Relations Commission (WRC).

Appendix A – Reasonable Accommodation Passport

Employee Name	
Employee Role	
Manager Name	

Document Completion Information

In completing this Passport, the employee consents to the information being held on their Profile in Personio which will be visible to HR, their line manager, and their future line manager(s) if this changes during their time within the Company.

If the employee does not wish for their Passport to be shared with a future line manager, they can decide to remove their Passport from Personio at that point in time. However, this will also mean that any reasonable accommodations will have to be rediscussed and agreed with the new line manager.

Passport Review Date	Manager Name	HR Name

Employee's Disability or Circumstances, Workplace Barriers, & History

This will allow the employee, manager, and HR to gain a better understanding of the individual's condition or illness and how it affects the individual.

Question	Answer	Action Points & Owner
What is the general nature of your disability or condition?		
What workplace barriers exist or might exist for you?		
Are or will these barriers be a constant or likely to change?		
If relevant: what ongoing treatment or support are you receiving outside of work?		
What adjustments/ accommodations do you believe would enable you to do your job most effectively?		
Are these adjustments/ accommodations required on a temporary basis (up to 6 months) or more permanently?		
Is there a work colleague you trust to confide in if you need additional support? If so, please give their name/ contact details.		

Agreed Accommodations

Provide a list of all the currently agreed accommodations

Accommodation	Date of Adjustment	Date of Review	Change of Accommodation Required (If Appropriate)

Emergency Information

Please provide any additional information that may be useful in case of an emergency related to your situation if appropriate. These should be checked and updated at review meetings as appropriate.

Who are the people you would like to be contacted in the event that you become unwell at work?	Name: Relationship: Contact details:
Are there any external sources of support that you would be happy for your line manager to contact on your behalf if you become unwell? E.g., GP; Psychotherapist; Specialist etc.	Name: Role: Contact details:

Employee's Signature _____ Date _____

Manager's Signature _____ Date _____

HR's Signature _____ Date _____