



The voice of blind and partially sighted people in Europe

EBU Guidelines on Reasonable Accommodation for visually impaired employees and applicants

(September 2023)

Aim of this document

With this document we aim to help employers and potential employers comply with the reasonable accommodation obligation as far as persons who are blind or partially sighted (i.e., visually impaired) are concerned, and to enable the latter to claim their rights.

We don't enter here into related but distinct considerations such as:

- how a visual disability is assessed and recognised;
- the statutory funding that is required to enable employers to comply with the obligation to provide reasonable accommodation to visually impaired employees;
- disclosure of disability, i.e., the employer's ability to ask questions related to visual disability and to conduct medical examinations at the pre-offer and post-offer stages, as well as in employment;
- respecting the confidentiality of information about an employee's disability;
- the protection of disabled employees against harassment; or
- when an employer may refuse to hire, terminate, or temporarily restrict the duties of a person who has or had a vision impairment because of safety concerns.

We however address some essential procedural aspects, namely how to go about disclosing a disability and requesting accommodation, and what an employer can request in the matter, as well as the implementation and review of accommodation.

These guidelines, prepared by Antoine Fobe, EBU Head of Advocacy and Campaigning, are the result of exchange with our national member organisations and are inspired by the compilation of various US sources online in relation to the American Disability Act.

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1. Preliminary considerations

There is value and potential interest for an employer to having diversity of the workforce, including persons with disabilities. People with visual impairment could actually bring an edge, or special aptitudes that come along with their impairment, that could make it worth the effort, as per legal obligation, to provide them with reasonable accommodation in employment in the open labour market.

1.1. Legal background

1.1.1. The UNCRPD

Article 27 of the UN Convention on the Rights of Persons with Disabilities ('CRPD') which was approved on behalf of the European Community by Council Decision 2010/48/EC of 26 November 2009, and also ratified by all EU member states, says:

“States Parties recognise the right of persons with disabilities to work, on an equal basis with others; this includes the right to the opportunity to gain a living by work freely chosen or accepted in a labour market and work environment that is open, inclusive and accessible to persons with disabilities. States Parties shall safeguard and promote the realisation of the right to work, including for those who acquire a disability during the course of employment, by taking appropriate steps, including through legislation, to, inter alia:

(...)

(i) Ensure that reasonable accommodation is provided to persons with disabilities in the workplace”.

1.1.2. EU law

The EU Equality in Employment Directive (2000/78/EC) aims to ensure that persons with a disability (among other people) do not suffer from discrimination and instead enjoy equal treatment in the workplace, as is made clear in Recital (16):

“The provision of measures to accommodate the needs of disabled people at the workplace plays an important role in combating discrimination on grounds of disability.”

Article 5 (Reasonable accommodation for disabled persons) provides:

“In order to guarantee compliance with the principle of equal treatment in relation to persons with disabilities, reasonable accommodation shall be provided. This means that employers shall take appropriate measures, where needed in a particular case, to enable a person with a disability to have access to, participate in, or advance in employment, or to undergo training, unless such measures would impose a disproportionate burden on the employer. This burden shall not be disproportionate when it is sufficiently remedied by measures existing within the framework of the disability policy of the Member State concerned.”

1.2. Definitions

1.2.1. Disability

Recital (a) of the CRPD’s Preamble says: “disability is an evolving concept and (it) results from the interaction between persons with impairments and attitudinal and environmental barriers that hinders their full and effective participation in society on an equal basis with others.”

And Article 1 of the CRPD: “Persons with disabilities include those who have long-term physical, mental, intellectual or sensory impairments which, in interaction with various barriers, may hinder their full and effective participation in society on an equal basis with others.”

With this in mind, someone with a vision impairment is to be considered as having a disability requiring accommodation if substantially limited in seeing. This is regardless of the positive effects of any mitigating measure that is used, such as low vision devices or learned behavioural modifications (e.g. persons with monocular vision may turn their head from side to side to compensate for the lack of peripheral vision).

Instead, someone who wears glasses is not a person with a disability if the use of ordinary lenses results in no substantial limitation to a major life activity.

1.2.2. Reasonable accommodation

[What does accommodation mean and what does it cover?](#)

Any change/adjustment/modification in the work environment or in the way a job is performed that enables a person with a disability to enjoy equal employment opportunities. Recital (20) of the EU Directive says: “Appropriate measures should be provided, i.e. effective and practical measures to adapt the workplace to the disability, for example adapting premises and equipment, patterns of working time, the distribution of tasks or the provision of training or integration resources.”

What is reasonable accommodation and what is not?

There are different types of possible reasonable accommodation:

- No-tech: accommodation that costs little or no money and just requires time, support and creativity (e.g., additional preparation time for an individual, braille labelling, adapting the layout of furniture, or awareness and attitude of colleagues).
- Low-tech: any accommodation that is technologically simple or unsophisticated, and readily available in most offices (e.g., providing a magnifier or a voice recorder, printing documents in large print, or adapt computer settings to enable accessibility features).
- High-tech: any accommodation that uses advanced or sophisticated devices (e.g., screen reading software with synthesised speech, magnification software, Braille terminals/displays or fully accessible mobile phone if one is provided by the employer).

The accommodation is reasonable only in so far as it is technically possible and available, does not impose a unreasonable burden on the employer, i.e., if providing the accommodation will result in significant difficulty or expense. Article 2 of the CRPD: “Reasonable accommodation” means necessary and appropriate modification and adjustments not imposing a disproportionate or undue burden, where needed in a particular case, to ensure to persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms”. Recital (21) of the EU Directive: “To determine whether the measures in question give rise to a disproportionate burden, account should be taken in particular of the financial and other costs entailed, the scale and financial resources of the organisation or undertaking and the possibility of obtaining public funding or any other assistance.”

Also important to note is that an employer:

- does not have to eliminate an essential function of a job as a reasonable accommodation, tolerate performance that does not meet its standards, or excuse violations of conduct rules that are job-related and consistent with business necessity and that the employer applies consistently to all employees (such as rules prohibiting violence, threatening behaviour, theft, or destruction of property). Recital (17) of the EU Directive says: “This Directive

- does not require the recruitment, promotion, maintenance in employment or training of an individual who is not competent, capable and available to perform the essential functions of the post concerned or to undergo the relevant training”; and
- does not have to provide employees with personal use items, such as eyeglasses or other devices, that are used both on and off the job.

1.3. Support

In many European countries, the blind or partially sighted jobseeker’s needs are usually assessed for a range of areas, including the job environment, by the local visually impaired people’s organisation or by a rehabilitation centre. In that context, the employer is informed of the accommodation needs and of the related costs that may be covered or the object of financial support (for the employer or for the employee).

Indeed, solutions for reasonable accommodation may be eligible for public funding or tax deductions. And many solutions, typically assistive technologies, are often not to be paid for by the employer because directly provided to the employee (be it by a public funding scheme or a lending scheme of the visually impaired people’s organisation), so that when they change jobs, they take the aids with them to the new job.

For turn-to contact points in each country, we refer to the “Guidelines on reasonable accommodation at work addressing employers”, still being drafted by European Disability Expertise (EDE) for the European Commission, chapter “Support, information and partnerships available to employers to assist them to make reasonable accommodations”.

1.4. Choice and individualisation

1.4.1. Choice between different possible types of accommodation

If more than one accommodation would be effective, the employer is not required to provide the employee's first choice of reasonable accommodation. If a requested accommodation is too difficult or expensive, an employer may choose to provide an easier or less costly accommodation as long as it is effective in meeting the employee's needs. For example: an editor for a publishing company has a visual disability. She asks the company to hire a full-time reader for her. The employer is able to purchase a computer program that will magnify text

on the screen and speak the words to her. If this is cheaper and easier for the employer to do, and allows the editor to do her work just as effectively, then it may be provided as a reasonable accommodation.

1.4.2. Adapting to the needs of the individual

However, the employee's preference should be given primary consideration, to individualise the accommodation, i.e., tailor it as much as possible to the individual disabled employee's needs. For example, a blind job applicant requests a reader for an employment test. The employer requires the applicant to take the test in Braille instead, although he has told the employer he is not proficient in Braille. In this situation, because providing the test in Braille is not an effective accommodation, the employer must provide a reader unless to do so would be an undue hardship.

Although a particular accommodation may work for one person, an employer should not assume that the same accommodation will work for another person with the same apparent visual disability. Employers should ask particular employees requesting an accommodation what they need that will help them do their job. In other words, the process of providing reasonable accommodation is individualised and interactive.

Regardless of the importance of individualising the solution it is still possible to give some guidance—which is what we aim to do in the rest of this document. Some of our recommendations although presented with blind and partially sighted people in mind, are also relevant for people with other types of disabilities.

2. Reasonable accommodation in good practice

Reasonable accommodation is needed, not only by employees in the job, but also for applicants in the recruitment process, i.e., before and after an employment offer is made, as well as in the benefits and advantages of employment. We will address all three categories of "reasonable accommodations" in the chronological order: (a) changes to the job application process ("before employment"); (b) changes to the work environment, or to the way the job is usually done ("at work"); and (c) changes that enable an employee with a disability to enjoy equal benefits, advantages and professional development opportunities as their peers ("around work"). In a fourth section, we will address changes at work as a disability appears or evolves.

2.1. Before employment

A company's employment recruitment process must be accessible by the visually impaired, too. Whether it's the job application itself or tests related to employment qualifications, visually impaired employees need to be able to request that these processes are accessible to their needs. That might require assistive technology or an individual dedicated to assisting the visually impaired employees with the application or tests; but the employer should not assume that every visually impaired applicant will approach things in the same way.

Whether visually impaired applicants choose to disclose their disability (see the part 'Procedural aspects') or it is known by the employer, the employer should preferably spontaneously ask them how they would like elements of the application process to be modified to meet the requirements of the hiring process.

Here are some **tips to help the employer comply with the reasonable accommodation obligation**:

2.1.1. Application form

If the application process requires an application form, the recruiter should ask the applicant with a visual impairment which of the following options for receiving and completing the form would work best:

- Mailing or emailing the application to the candidate.

- Allowing a candidate to come and get the application form at the office.
- Offering the services of someone at the office to help the candidate fill out the form.
- Allowing the candidate to return the application form by mail, email or in person.

2.1.2. Interview

When inviting to an interview, the employer should:

- For directions to the office, point the candidate to an accessible 'getting there'.
- Offer assistance from the reception area to the meeting room, and ask the candidate how concretely they would like to be assisted. One should not insist on helping or push the person ahead. The candidate with sufficient vision or using a cane or a guide dog may prefer to follow. If the person uses a guide dog, it should not be petted or distracted, but the candidate may be asked if they need anything for the dog.
- When getting to the room of the interview, lead the candidate to their chair either by asking if you may place the person's hand on the back of the chair or by indicating distance and direction. The visually impaired applicant should not be pushed into a chair. The interviewer should also indicate where they are seated in relation to the candidate and at what distance.

The interview, like the application letter, is an opportunity for the visually impaired applicant to inform the potential employer of how the disability can be overcome.

2.1.3. Testing

Testing exercises should not reinforce traditional biases that disadvantage applicants with a visual disability. A dynamic range of tests formats should be used, with reasonable accommodation, to allow applicants to demonstrate their skills. The recruiter should ask the candidate how to adapt the exercise so they can perform it on an equal basis with other candidates. For example, it is good practice to allow blind or partially sighted applicants to use their own IT material during a written test and/or to grant them extra time to take the test.

2.1.4. At the source

In general, employers, based on a proper company policy, should take a proactive approach to recruiting diverse applicants, namely by:

- Ensuring that the website where the job advertisement is published is accessible, as well as of the other external media used to.
- Running job advertisements through non-traditional channels targeting people with disabilities.
- Ensuring that the recruitment panel is also diverse.
- Involving disabled people’s organisations and rehabilitation centres in designing and advertising the recruitment process, and possibly even incite them to provide candidates and support the reasonable accommodation process.
- Learn and improve future recruitment through post-recruitment feedback of applicants with visual disabilities, whether successful or not.

Employers should also avoid a ‘tokenistic’ recruitment approach consisting in looking for candidates with disabilities for certain jobs with high visibility but little career development opportunities.

2.2. At Work

The types of accommodation listed hereafter are examples of adjustments or modifications that are commonly requested by visually impaired employees to perform their essential job functions regardless of their disability. An employer may be required to provide more than one accommodation for the same employee with a visual disability at a given time, i.e., it will often be the case that different possible types of accommodation at work need to be combined, even within a single category such as assistive technology.

2.2.1. Assistive technology

Assistive technology is one of the most important accommodations for employees who are blind or partially sighted. Thanks to modern technology, there are many resources available that companies can use to make accommodations for employees who are visually impaired. Assistive technology allows visually impaired employees to access computers and other electronic systems in the workplace with ease. And since computers are indispensable parts of almost every modern workplace, assistive technology plays an essential role. Popular examples of assistive technology include:

- Keyboard adjustments (e.g., larger keyboard, or keyboard with physical letters or braille)

- Optical scanners that can create documents in electronic form from printed ones
- External computer screen magnifiers
- Closed circuit television system (CCTV) for reading printed materials
- Digital recorders such as speech-to-text or transcription programs
- Software that will read information on the computer screen (to avoid disrupting other employees, the employee should be supplied with headphones)
- Braille terminals to allow blind or visually impaired people to interact with a computer
- Braille embossers (also known as ‘braille printers’, this is the device that presses dots down onto a piece of paper to let a person using the braille system read by using their fingers)

2.2.2. Personal assistance

Autonomy and inclusion are the key words, but for some jobs, assistance helps to guarantee this. Providing an assistant as needed may be a reasonable accommodation for a person with a visual disability, if this does not impose an unreasonable burden, either to perform essential tasks, or to perform some non-essential tasks. For example, an assistant may be needed to retrieve items on shelves or file documents, or to guide a blind person who must travel as part of the job.

2.2.3. Accessible website and written materials

Employee portals, message boards and other online materials should be accessible to workers with a visual impairment. Whether that’s accomplished by assistive technology, such as magnifying devices or screen-reading software, depends on the company, the visually impaired person, and the situation. In any case, making any and all online materials accessible is a vital part of workplace accessibility efforts. If employees cannot access a website or online system that their job requires them to use, they should be able to request that these be made accessible.

Employees with a visual impairment should also feel comfortable requesting that all written materials required for their job, from employment documents to invoices and everything in between, be available in their preferred accessible format—such as braille, large print, high contrast, or accessible digital format.

2.2.4. Adjusted work environment

The employer is not required to make structural changes to the work environment that are an unreasonable burden. Structural changes are necessary only to the extent that they will allow an employee with a disability to perform the essential functions of the job, including access to work stations, and normal support facilities such as bathrooms, water fountains, and lunchrooms. Non-structural changes (e.g., remote work, policy changes, staff awareness raising, training and education) are allowed instead of structural changes if they achieve the same result. Besides what is a matter of basic workplace safety best practices, such as avoiding any clutter or loose wires around the workspace, here are some popular examples of adjusted work environment for people with a visual disability:

Quiet space

In some cases, depending on the assistive technology used or not, a quiet space will allow visually impaired employee to concentrate better on their work. Having a work space of their own can also allow them to use some assistive devices without disturbing other employees.

Shared spaces

Shared spaces at the office are also a growing trend at work, and it should be carefully thought out as likely to raise difficulties for visually impaired employees, who rely on the familiarity of the working place and knowing where colleagues can be found. They also possibly rely on assistive technology specific to their working post, quiet space as indicated above, etc.

Floorspace Adjustments

People with visual disabilities may have trouble moving around a crowded office space. Accommodations that don't require complete remodels can help deal with this problem. There should be provision for clear paths around the office through ensuring that every piece of furniture is separated enough to avoid a situation where one can stumble and fall. If the employee uses a white cane, there should be room for its use without other employees getting in its path.

Colour contrast

Using appropriate lighting and colour contrast in the office space and in the building, i.e., contrast of doors with walls, walls with floors, will greatly facilitate moving around for partially sighted employees. Alternatively, a

low cost solution is contrasting information (simple symbols) on the doors preferably also tactile. Staircases should have contrast stripes.

Handrails

The employer may also want to consider adding handrails. These come in handy not only for visually impaired people, but for many kinds of disabilities or occasional injuries. They're also useful for dark spaces, or just to give extra stability.

Labels

Labelling around the workplace not only provides an organisation boost, it is also a good way, if in Braille, good colour contrast or embossed characters (for example and depending on needs), to give tangible directions to those with vision impairments and help them get around the office space with ease. Labels also enable people who need to touch to understand what an object is, e.g., a photocopier or a coffee machine, and possibly even how to use it.

Meetings

All meeting documents should be provided in an accessible format for the visually impaired colleague, including those that are projected on a screen. For instance, these could be uploaded to an ipad for the concerned colleague. The non-verbal signs in communication, namely during a meeting, are also important and should be born in mind by participants.

Adapted emergency evacuation procedure

The organisation's emergency evacuation procedure needs to provide effective exit for employees with difficulty in mobility, including blind and partially sighted employees. The escape route for a visually impaired employee should be described in writing, in an accessible document in the preferred format of the employee, and it should be the object of special attention to accessibility of the built environment and of signposting. A person should be designated as responsible to assist a visually impaired colleague in evacuation. Evacuation practices, as required by law anyway, are an excellent opportunity to test how inclusive the procedures are.

Work from home option

As long as it doesn't interfere with productivity, employees who are blind or partially sighted should be able to request a work from home arrangement when their disability makes it difficult for them to travel to the office, occasionally or on a daily basis (e.g., very bad weather, bad

transport options considering one's specific disability-related needs). As working from home grows in popularity, a work-from-home option for the employee might be a better fit. This allows the employee to work where they are already comfortable so that they can do the job without worrying about the hazards and trials that the workplace provides. The employer should provide the employee with everything that they need to do the job (such as the transcription software) but allowing the employee to work from home means that there are fewer in-house accommodations to make that may not be feasible at the office. However, work from home should never be imposed on the employee, especially if in a proportion that is detrimental to social inclusion at work. Also, isolation and lack of support at home should be considered in that context.

2.2.5. Guide dogs

Guide dogs are an indispensable resource to get around for many people who are visually impaired, and they might not be able to get to work if they are not allowed to bring their guide dog to work. The employer therefore needs to allow guide dogs into the office, even if it's an office with a no-pet policy, as a matter of exception and reasonable accommodation. There should also be training for all the staff on guide dog etiquette, i.e., do's and don'ts around a guide dog, based on guidance from the dog user.

2.2.6. Cover of transportation costs

If transportation is required for visually impaired employees to perform the essential functions of their job (i.e. in their job, not to travel between home and the workplace), they should be able to ask for a driver or reimbursement for the cost of transportation. If the job for instance, includes a lease car, then the budget for that should be employed for the easy transportation for the employee with sight loss.

2.2.7. Flexible schedule

Public transportation or alternative transit services often dictate commuting schedules for people who are blind or partially sighted. Employees should be able to request flexible work schedules allowing them to work the required number of hours by staying late or coming in early without facing discipline for tardiness caused by transportation. A hybrid schedule is another option, in which employees work in-office some days of the week and at home on other days—see above, work from home option.

2.3. Around work

2.3.1. Equal access to benefits and advantages of employment

Reasonable accommodation also includes ensuring equal access to the following for visually impaired employees, that is not strictly in their work.

Facilities or portions of facilities to which all employees are granted access, such as a cafeteria, a canteen or a break room. For instance a voluntary colleague may be charged with the task of guiding the visually impaired employee around the premises, at least during an initial period.

Information communicated in the workplace. For instance, if internal job openings are published on bulletin boards, instead of through accessible emailing or intranet notification, an employee with a visual disability should be able to request to receive timely notice of these by email.

Employer-sponsored **social events.** For example, if an employer holds a party for its employees and the event includes a dinner and various presentations, with a formal program printed for the occasion, a visually impaired employee should receive an adapted accessible-format copy of the program, and this even if the employer has contracted with another entity to conduct the event. The event site should be accessible as well or personal assistance provided.

The company's onboarding and on-going **training schemes.** For instance, if the workplace is rolling out a new system or upgrading its computer programs, an all-staff training session may not cover keyboard commands or other details specific to assistive technology users.

Employees who are visually impaired should be asked what their specific needs are and whether they need individualised accessible instruction and training materials to allow them to learn these systems properly; and the training site should be accessible as well. Here again, that the training is provided by a company with which the employer has contracted should not allow the employer to ignore the obligation of reasonable accommodation. Importantly, all IT changes must be checked on their accessibility before purchasing them, otherwise, the testing and training stage may already be too late.

Temporary assignment to another position, when it is a valuable training opportunity that can lead to advancement. If, for instance, that would require only slight modifications to the visually impaired employee's computer equipment, that employee should be offered this opportunity in equal treatment with other employees.

Internal promotion. While preferring to stay in the same position can be a genuine personal choice that should be respected, professional development opportunities should be non-discriminatory for employees with a visual disability. Feedback from the employee on the effectiveness of accommodation should be detached from formal appraisal processes.

2.3.2. Time off

From time to time, for medical treatment or programs related to their disability, such as rehabilitation or training in accessibility software, employees who are visually impaired may need to take extended time off, in the form of accrued paid leave or unpaid leave if paid leave has been exhausted or is unavailable. They should regardless be able to request unpaid time off for these need. For example, an employee with a degenerative eye condition has, over time, lost most of her vision and needs to change from magnifying assistive technology software, to a screen reading programme, for which she needs to undergo a six-week residential training. Although the six weeks of leave that are needed exceed the amount of leave provided to each employee, the employer must provide additional unpaid leave as a reasonable accommodation as long as it would not result in undue hardship.

2.4. As a disability appears or evolves

Appropriate changes to an employer's policy are forms of accommodation, absent unreasonable burden. This includes:

2.4.1. Job restructuring

An employee must be able to perform the essential functions of the job, but where, for a person with a visual disability, it is possible to remove certain non-essential tasks from an employee's work requirements, this should be done. Job restructuring as a form of reasonable accommodation may involve reallocating or redistributing the marginal functions of a job. Typically, this can be done through a job-share arrangement, i.e., by exchanging marginal functions of a job that cannot be performed by a person with a disability for marginal job functions performed by one or more other employees. For example, if a company employs two customer service assistants where assisting customers is an essential function and inventory recording is a marginal one, it would be reasonable to reassign the task of inventory recording to the employee without a visual impairment in exchange for doing that employee's other marginal task, such as placing stock/items on shelves.

2.4.2. Reassignment to a vacant position

If an employee develops a disability after being on the job, and can no longer perform the essential functions of the job, the employer may need to reassign the employee to a vacant position within the company, if doing so does not constitute an unreasonable burden. The new position should be one that the employee is qualified to perform and that pays a comparable salary. Reassignment does not require the employee to compete for the new position; on the other hand, it does not require the employer to violate a seniority system or collective bargaining agreement under which someone else is entitled to the vacant position. In any case, it should be considered only if there are no reasonable accommodations available that would allow the employee to perform the essential functions of the current job.

2.4.3. Reassigning to light duty

If the employer has a programme whereby certain jobs are reserved for light duty, reassigning an employee with a visual disability to a vacant, suitable light duty position might be required as a reasonable accommodation, depending on how the light duty program is designed, if the employee cannot perform his/her current position because of the disability, with or without a reasonable accommodation. There is, however, no requirement to create a light duty position or any other position. For example, if a city police officer is shot and blinded during an attempt to stop a robbery, and is no longer able to perform his job as a police officer, he should be considered for instance for a vacant emergency operator position as the closest vacant position in terms of pay, status, and benefits for which the officer is qualified.

3. Procedural aspects

3.1. Requesting reasonable accommodation

The request for a reasonable accommodation will be in the form of a proactive request from the concerned employee or applicant, or be the natural consequence of a reply to the legitimate enquiry made by the employer or of the results of medical examinations. For instance, if an employee has been out on extended medical leave for his diabetes and his visual disability has gradually gotten worse, the note from the doctor that he presents, stating that he will need "some assistance" in order to perform the essential functions of the job, is a request for a reasonable accommodation. The same applies in the case of a report after a periodical medical examination for all employees.

If the employer or recruiter requires more information about the disability and why an accommodation is needed, then a dialogue should engage between the two parties to help the employer accommodate the request. As indicated in the section about interviews, if needing reasonable accommodation, the visually impaired candidate should be proactive about informing the employer how their disability can be overcome and with what support, and the special skills they have that can make up for the disability.

3.2. Documentation request

An employer (i.e., the relevant staff, be it in human resources, a medical assistant or direct line manager) may request documentation when an employee who has a visual disability requests a reasonable accommodation, if the vision impairment is not obvious. In that case the employer may ask the person to document how the condition limits major life activities (i.e., the visual disability) and why a reasonable accommodation is needed. An employer, however, is entitled only to documentation sufficient to establish that the employee has a visual disability and to explain why an accommodation is needed. He may request a letter from the employee's ophthalmologist describing the impairment, the resulting limitations at work and why reasonable accommodation is needed (for example: "The employee can read standard-sized print but only very slowly, for short periods of time, and with considerable effort, so that providing some kind of magnification device for the computer or a larger monitor would be helpful"). Instead,

he may not request access to the entire medical record, nor the results of all the tests conducted to diagnose the condition, which would likely include information about conditions other than the employee's visual disability. In most European countries, the role of the rehabilitation/occupational healthcare centre is crucial in the assessment of the disability and related accommodation needs (i.e., without the employer needing to see their medical files), as well as to advise and inform the employer about financial or other support.

3.3. Implementation and review of accommodation

Once an accommodation is approved, it should be implemented as soon as possible. This again, and all that follows, will often be done in collaboration with the rehabilitation centre or social worker from the local organisation of the blind and partially sighted.

After the accommodations have been granted, the employer should within a few weeks assess how effective they are in enabling the employee to perform the essential functions of the job and, if necessary, re-evaluate and modify the accommodations.

As the disability evolves or after having had more experience to define the needs of the employee, the employee should feel entitled to request more than one accommodation. In other words, the process of providing reasonable accommodation is an ongoing one. For example, an employee with retinitis pigmentosa, a degenerative eye condition that results, over time, in total or near total blindness, has been able to read printed materials related to her job with a magnifier and some adjustments to the lighting in her work area. When she is no longer able to do this, she asks for a reader. If there is no unreasonable burden, the employer must provide a reader or some other effective accommodation.

If the accommodations are not effective and there are no other methods of accommodation that can assist the employee in performing the essential functions of the job, then the employer and the employee will have to discuss accommodation in the form of job restructuring or, if applicable, reassignment to a vacant position or light duty – see the section “As a disability appears or evolves”.

4. Conclusion and further reading

In any employing organisation, the leadership's commitment to implement reasonable accommodation is of course crucial, but beyond that, human resources and senior management, as well as all staff with direct line management responsibilities should be aware of the reasonable accommodation requirements.

For further reading, we refer to the following documents, which concern all types of disabilities, not only visual ones:

- [Accessibility GO! A Guide to Action, Delivering on 7 accessibility commitments](#), World Blind Union and CBM Global Disability Inclusion, K. Al Jubeh, B. Dard, Y. Zayed, November 2020. Relevant here is Commitment 7, about which the guide provides an “Inclusive Employment Self-Assessment Template”.
- “Guidelines on reasonable accommodation at work addressing employers”, still being drafted by European Disability Expertise (EDE) for the European Commission as we were finalising this document. The guidance there is very complementary to ours here, as it largely consists in illustrative examples of good practices.
- [“How to put reasonable accommodation into practice – Guide of promising practices”](#), published by the European Commission in May 2019 and prepared by Dr. Magdi BIRTHA, Rapporteur of the EUvsDiscrimination campaign, researcher at the European Centre for Social Welfare Policy and Research. This guide is more people with disabilities oriented and also informs them about how to enforce their rights and challenge discrimination at work.

We decline responsibility for the accessibility and maintenance of these external links.

About EBU

The European Blind Union (EBU) – Interest Representative Register number 42378755934-87 – is a non-governmental, non-profit making European organisation founded in 1984. It is one of the six regional bodies of the World Blind Union, and it promotes the interests of blind and partially sighted people in Europe. It currently operates within a network of 41 national members including organisations from 27

European Union member states, candidate countries and other countries in geographical Europe.