

Supporting People with Disabilities



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Introduction

PWD	Persons with Disabilities
RA	Reasonable Accommodations
UNCRPD	United Nations Convention on the Rights of Persons with Disabilities
EEA	Employment Equity Act 55 of 1998
The TAG	The Technical Assistance Guidelines on the employment of Persons with Disabilities
WHO	World Health Organization
DPSA	Disabled People South Africa
OT	Occupational Therapist

Background

Persons with disabilities have higher levels of unemployment and often remain in lower status jobs, earning lower than average remuneration. The World Health Organisation estimates that 10 % of the world’s population a consists of people with disabilities, with the majority of these in developing countries. According to Stats SA 7.5% of people in SA have a disability. That equates to more than 2,8 million South Africans. However, Disabled People of South Africa (DPSA) are disputing the figures released by Stats SA:

“This is a total fabrication of statistics because it doesn’t look at disability as a social issue. With this medical model people don’t always disclose their disabilities,” said Siphuka.

(Olwethu Siphuka, national spokesperson for DPSA).

According to DPSA, the prevalence of disability is almost double the amount (14%) compared to the Stats SA figure of 7.5%. That equals roughly 5,6 million persons with disabilities in South Africa.

The 2016 Commission for Employment Equity report indicates that little progress in the employment of persons with disabilities has been made since the inception of the Employment Equity legislation in 1998. In South Africa, PWD hold less than 1 % of the jobs. Government institutions has a target of 2%, but only 1.3% of their workforce are PWD. To add to this problem many people with disabilities who are employed are mainly hired to do menial tasks, and many of them are employed at the lowest entry levels of the organisation.

Relevant legislation

In order to understand disability, we have to make sense of the terms and definitions used in the field. The disadvantage of diagnostic or disability categories is that people are labelled in one way or another and these labels set people apart and is often perceived as negative. It is also important to note here that there are different definitions of disability, depending on the theoretical assumptions on which is it built and the purpose for which the definition was intended. For Learnership purposes, we adhere to the definition and criteria as stipulated in the EEA.

The United Nations Convention on the Rights of Persons with Disabilities (CRPD)

South Africa committed to respect and implement the rights of persons with disabilities as documented in the CRPD, and have thereby entered into a commitment to translate its principles into both policy and practice.

The importance of the CRPD is that it provides a basis for the protection of employees with disabilities in the workplace.

The Constitution and Disability

The South African Bill of Rights is the principal source of legal rights for persons with disabilities. It affirms the democratic values of equality, human dignity and freedom. Equality is therefore a right and it recognizes that people are different and that they may require individual attention / accommodations.

In light of the above, it can be argued that disability is a human rights issue and we should adopt a human rights approach to disability in SA. If we agree to adopt a human rights approach to disability, we agree that discrimination on the basis of a person's disability status has no place in SA and in the workplace, as it would be anti-democratic.

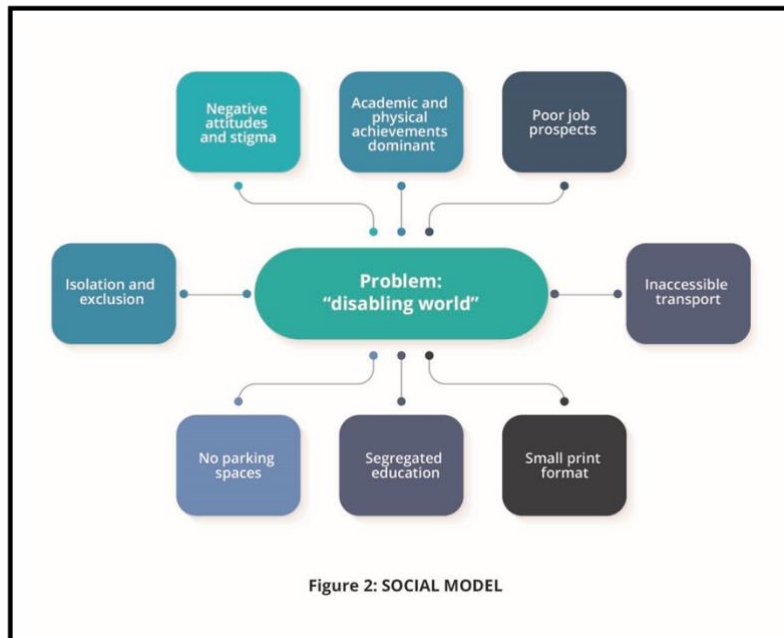
We have no hope of fighting stigmatisation and discrimination if companies do not adopt an inclusive policy. Getting rid of stigma starts with vigorous, continuous sensitization for all staff to create awareness and understanding in order to facilitate acceptance of diversity and ultimately, inclusion. It is therefore the employers' duty to establish an environment that does not tolerate discrimination.

The Employment Equity Act (EEA) 55 of 1998

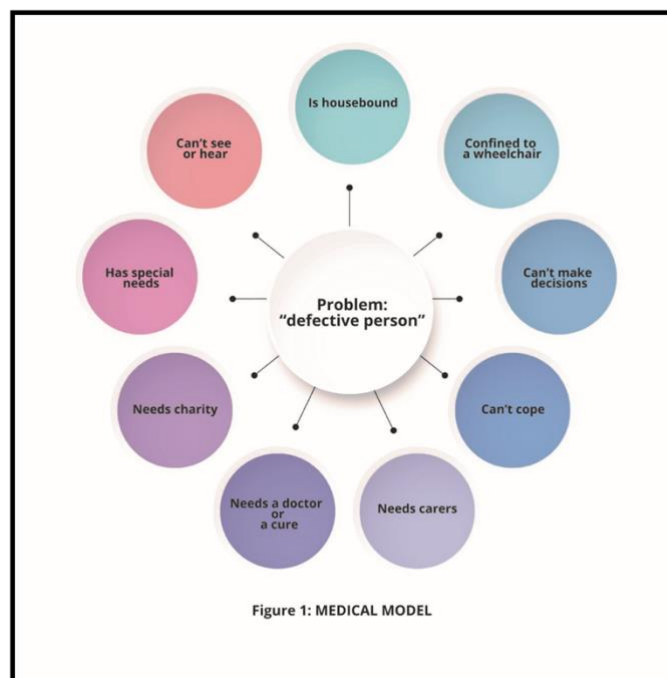
The purpose of the Act is to achieve equity in the workplace by –

- i. Promoting equal opportunity and fair treatment in employment through the elimination of unfair discrimination; and
- ii. Implementing affirmative action measures to redress the disadvantages in employment experienced by designated groups, in order to ensure their equitable representation in all occupational categories and levels in the workforce.

The EEA has aligned their definition of disability with the Social Model of Disability (figure 2) The Social Model recognises that social contexts, shaped by misunderstanding, ignorance and fear, can create barriers that prevent or limit opportunities for persons with disabilities to participate on an equal footing.



In direct contrast to the Social Model, stands the Medical Model of Disability. The main criticism of this model its approach is that problems experienced are seen as situated within the person (figure1).



The Code of Good Practice on key aspects of disability in the workplace (The Code)

The Code is a guide for employers and employees on key aspects of promoting equal opportunities and fair treatment for people with disabilities as required by the EEA. It is intended to help employers and employees to understand their rights and obligations to ensure that people with disabilities can enjoy and exercise their right to work.

The Code covers the following:

- The definition of disability
- Reasonable accommodations
- Avoiding unfair discrimination and achieving employment equity during the employment cycle
- Confidentiality and disclosure
- Employment benefits
- Employment equity planning

The Technical Assistance Guidelines on the employment of persons with disabilities (TAG)

The TAG is intended to complement The Code to assist with the practical implementation of aspects of the Act relating to the employment of PWD.

“Persons with disabilities should not be viewed as objects of charity, medical treatment and social protection, but as full and equal member of society with human rights.”

The TAG provides an explanation of the definition of disability, as well as the necessary guidelines to assist in the application of these concepts in practice.

The definition of disability

Interpretation of the definition according to the TAG

In attempting to assess whether the impairment constitutes a disability, the criteria must be evaluated, using the guidelines as described in the TAG to assist in the application and understanding of these criteria.

Criteria to be met:

- Firstly, the impairment has to be long term or recurring
- Secondly, the person must have a physical or mental impairment
- And Thirdly, it has to be **substantially limiting** to the person who has the impairment.

Substantially limiting means that the nature, duration or effects significantly limits the person’s ability to perform the essential functions of the job. Should a person meet all the criteria, but is not

substantially limited in terms of their specific job, then the person cannot be classified as disabled according to the EEA.

A physical impairment means a partial or total loss of a bodily function or part of the body. It includes impairment such as hearing and visual impairments. A partial loss can be someone who has had a stroke and has lost the use of one arm. A total loss includes conditions such as paraplegia, amputation or blindness.

Long term means the impairment has lasted or is likely to persist for at least twelve months. Recurring means the impairment is one that is likely to happen again i.e. conditions such as Rheumatoid Arthritis where a person has flare ups and then times of remission.

In order to determine whether a person meets the criteria as per the EEA, you have to take the following into consideration (figure 3):

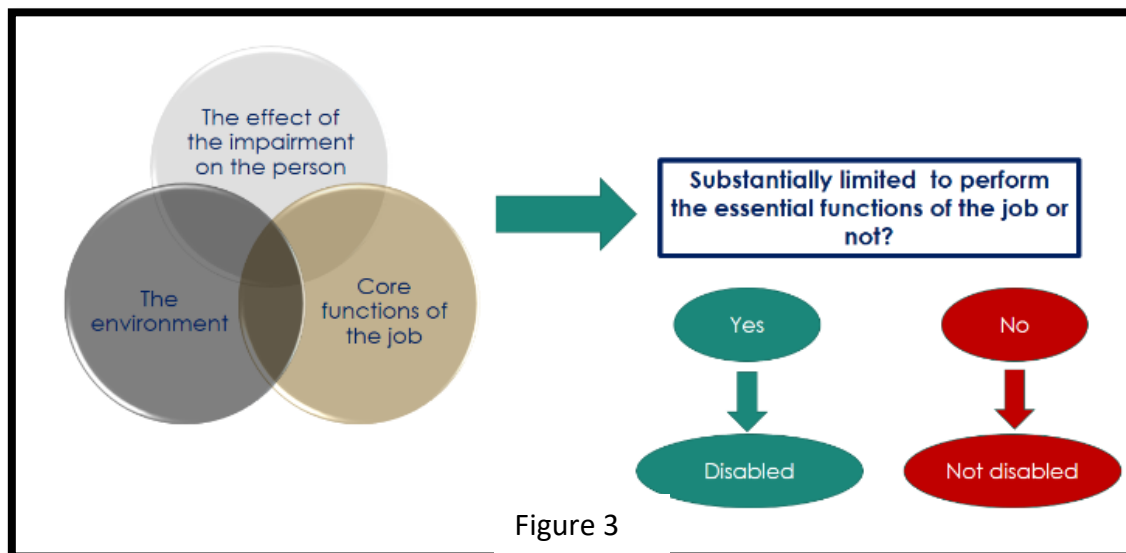


Figure 3

Occupational therapists are trained in the assessment of the effects a person's impairment has on their daily function. The OTs are also skilled in analysing the environment a person works in, as well as do a detailed job analysis.

A job analysis takes into account all the functions of a specific job and considers the physical, psychological and social demands it places on an employee.

Exclusions under the EEA

Two categories of impairments are excluded:

1. Impairments that are easily controlled, corrected or lessened that they have no limiting effects.

Example: a person who requires spectacles or contact lenses resulting in perfect vision. If the person still finds it difficult to see despite having spectacles and therefore require accommodations in the workplace such as enlarged font, the impairment is considered substantially limiting.

2. The second category are referred to as public policy exclusions. These include but are not limited to:
 - Sexual behaviour disorders
 - Self-imposed body adornments such as tattoos and body piercing
 - Compulsive gambling, tendency to steal or light fires
 - Disorders that affects a person’s mental or physical state if they are caused by current use of illegal drugs or alcohol, unless the affected person is participating in a recognised programme of treatment
 - Normal deviations in height, weight and strength; and conventional physical and mental characteristics and common personality traits.

If the effects of the impairment **are not substantially limiting** even if they are physical and/or mental, are long term or recurring, then the person is not covered under the act. **A diagnosis alone does not automatically equal a disability.**

Taking the above definition into consideration, it is not possible to give you a list of disabilities as a diagnosis does not automatically equal a disability

Checking the criteria in practice:

A person with a disability must meet all 3 criteria in the sequence as set out in the definition.

Criteria	Question	Yes	No	Comments
Physical impairment	Do you have a physical impairment that may limit your ability to perform the essential functions of the job?			This includes sensory impairments i.e. vision or hearing impairments.
Mental impairment	Have you ever been diagnosed with a mental disability?			Has a professional identified this as a clinically recognized condition?
Long term	Have you had this condition for more than 12 months?			12 months or longer.
Recurring	Is this impairment a once off occurrence or does it fluctuate?			The condition is likely to occur again and includes chronic conditions even if its effects on the person fluctuate.
Substantially limiting	Can the effect of your disability be easily controlled with medication? Can this disability be easily corrected with a device? Can the effect of the disability be reduced by e.g. medical treatment?			

Important terminology and the implications thereof

The next 3 terms are not synonyms and describe very different states and suggests the need for different actions to be taken by both the employer and employee.

The terms are *impairment, incapacity and disability*. The definition and explanation for “disability” is as above. Below, definitions for impairment and incapacity.

IMPAIRMENT

There has been a loss or decline in a person’s ability to perform certain functions, either physically, mentally or both. However, with reasonable accommodation, the person will be able to perform the essential functions of a specific job.

INCAPACITY

The situation where an employee is unable to carry out or perform to his/her contracted obligations due to the inherent inability on the part of the employee. Incapacity is distinguished from misconduct and discipline in that ‘fault’ or; blame’ is not alleged in incapacity. The easiest way to understand this term is to ask yourself: “is my employee able to perform the essential functions of a specific job with reasonable accommodation?” If the answer is no, the employee is incapacitated.

Reasonable Accommodations

The EEA states that all employers should reasonably accommodate the needs of Persons with Disabilities. RAs are not just applied during the employment part of the process, but from as early as job profiling and advertising. The goal is to remove any barriers impacting on the person’s capacity to perform as his or her best during all phases of employment.

The employer may adopt the most cost-effective means to ensure that the person enjoys equal access to the benefits and opportunities of employment.

RAs are not just applied during the employment part of the process, but from as early as job profiling and advertising.

It may be required:

- During the recruitment and selection processes
- In the working environment
- In the way work is usually done, evaluated and rewarded
- In the benefits and privileges of employment

When is the employer obligated to offer reasonable accommodation?

- When the applicant or employee voluntarily discloses a disability-related accommodation need
- When such a need is reasonably self-evident to the employer
- When work or the work environment changes, or the impairment varies which affects the employee’s ability to perform the essential functions of the job

How to go about determining reasonable accommodations required for an individual

- Consult the employee – they usually know best what their needs are
- Consult a technical expert ie. an occupational therapist

The particular accommodation will depend on the individual, the impairment and its effect on the person as well as on the job and working environment

Examples of Reasonable Accommodations

- Adapting existing facilities to make them accessible
- Adapting existing equipment or acquiring new equipment
- Re-organize workstations
- Changing training and assessment materials and systems
- Re-assign non-essential functions
- Adjusting working time and leave
- Providing specialized supervision, training and support

Examples of Reasonable Accommodations for different impairments

Suggestions

Vision	Hearing	Mental illness	Intellectual
<ul style="list-style-type: none"> • Identify yourself clearly • “Shall we shake hands” • “May I offer you an arm?” • Magnifying devices • Allow use of smart phones. • Allow guides dogs on premises. • Give a brief description of the layout of an unfamiliar area.. • Warn when approaching stairs. • Place the person’s hand on 	<ul style="list-style-type: none"> • Don’t assume how much a person can hear – ask how loud you should speak. • Draw the person’s attention with a light tap on the arm before speaking. • Face them when speaking to them with the light behind them. • Keep your face and lips visible. • Hand gestures are useful. Use as normally 	<ul style="list-style-type: none"> • Be flexible - as some mental health conditions can be episodic. • Agree to RAs which are appropriate for the organization and the individual. • Allow time of monthly to collect medication. • Take a flexible approach to shift patterns. • Consider temporary reallocation of some tasks at 	<ul style="list-style-type: none"> • Be patient. • Communicate with the person normally. • Keep your conversation clear and straight-forward. • Don’t pressure the person to answer your questions quickly. • Give short instructions (2 or 3 steps, depending n the individual). • Divide larger tasks into
<ul style="list-style-type: none"> the arm or back of a chair and let them sit down by 	<ul style="list-style-type: none"> • Keep sentences short. Rephrase rather than repeating 	<ul style="list-style-type: none"> times. • Allow the individual to focus on 	<ul style="list-style-type: none"> smaller ones. • Repeat instructions if

ACQUIRED BRAIN INJURIES	AUTISM SPECTRUM DISORDERS
<ul style="list-style-type: none"> • Consider physical limitations • Consider visual problems • Help the person to maintain their stamina during the day for example frequent breaks, additional time to learn tasks, allow job sharing, assign a mentor, scheduling mentally challenging tasks for earlier in the day. • Concentration: allow the person to work in a quiet space, break tasks into smaller steps, allow frequent breaks, allow the person to focus on one task at a time. • Limit verbal instructions. • Help the person make a written to-do list. • Allow the employee to take a break as a part of a stress management plan • Recognize that emotionality and irritability can be common following some TBIs • Recognize that the individual's ability to manage stress can be impacted by a TBI 	<ul style="list-style-type: none"> • People with Autism usually have difficulties in verbal and non-verbal communication and social interactions. • RAs will depend on the type of Autism. • Consider sensory issues (sensitive to noise, touch, light) and eliminate exposure to this. • Provide clear guidelines of what is expected of the person to do. • Assign a buddy for times when the person becomes overwhelmed or find themselves in a conflict situation. • Model appropriate behaviour.. • Allow the person to avoid making eye contact. • Judge how much information the person can take on board. • Keep anxiety levels in mind. • Do not use sarcasm or shout at the person. • Talk through problems and offer practical solutions.

PROGRESSIVE CHRONIC CONDITIONS	PHYSICAL DISABILITIES
<ul style="list-style-type: none"> • Consider physical limitations • Consider adapting accommodations as the illness progresses • Help the person to maintain their stamina during the day for example frequent breaks, additional time to learn tasks, allow job sharing, assign a mentor, scheduling mentally challenging tasks for earlier in the day. • Consider the impact of pain and fatigue. • May require flexible work hours. • Concentration: allow the person to work in a quiet space, break tasks into smaller steps, allow frequent breaks, allow the person to focus on one task at a time. 	<ul style="list-style-type: none"> • Consider access to the site. • Allow parking near entrance. • Allow use of equipment i.e. crutches. • Consider pain and fatigue. • Keep walkways clear. • Allow extra time to walk from point A to point B. • Avoid ladders / stairs if required. • Allow time of for doctors' visits. • May need to avoid lifting and carrying of heavy loads. • Provide with a trolley to transport loads. • Allow work to be done in sitting position. • Allow use of assistive devices. • Ensure toilets, restrooms and canteen areas are accessible. • Are floors non-slip and corridors wide enough? • When talking to a person in a wheelchair or a person of short stature, step back or kneel down to make eye contact. • Place items within the person's reach. • Ask what kind of assistance a person needs – don't make assumptions.

Inclusive workplaces

Roadmap

1. **Commitment** from leaders, managers and disability champions: numerical goals, resources and workplace culture issues.
2. **Workplace audit** – culture assessment to identify numbers, practices trends and current return-to-work practices Integrate with the EEA Section 19 analysis plans → set targets
3. **Secure resources** – human resources to support the implementation team
4. **Develop a framework** – focus on policies and legal obligations; clarify targets, time frames and resource allocations
5. **Integrate other people processes** – workforce planning, employment equity and skills development plans and processes
6. Build capacity through **training and awareness**
7. Measure results and communicate outcomes and progress

People practice’s checklist

Task	Yes	No
1. Develop a policy statement about disability and the organization’s commitment and intentions.		
2. Communicate intention and commitment to all levels of staff.		
3. Establish a disability network and support groups of leaders, managers, employees and persons with disabilities to support the recruiting, hiring, retention and promotion of PWD.		
4. Integrate disability into policies and practices such as the employment equity policy, the skills development policy, and recruitment and promotion policies.		
5. Ensure that affirmative action measures include PWD as beneficiaries.		
6. Explore flexible work arrangements as reasonable accommodation to enable PWD to continue employment.		
7. Provide equal, fair and objective platform for PWD to raise disputes.		
8. Educate the entire organization about disability as a human rights issue and business goal.		
9. Continue to consult with employees with disabilities (“Nothing about us, without us”).		
10. Leaders and manager are accountable for their efforts and deliberate plans in creating inclusive workplaces.		

Considerations during the Employment Cycle

Confidentiality and disclosure of Disability (TAG Chapter 14)

- Gather and disclose only with WRITTEN consent
- Keep record separate from general personnel records
- Destroy information when no longer required
- May only reveal an employee's disability if required for health and safety reasons, but AFTER consulting the employee – advise relevant staff on reasonable accommodation needs.
- Right to disclose at any time.
- Disability status may only be revealed if relevant to health and safety.

Recruitment and Advertising (TAG Chapter 7)

Purpose of the recruitment process

Find out whether the applicant has the skills and capability to undertake the essential functions/requirements of the job.

Employers need to ensure that the environment is:

- Enabling
- Accessible
- Welcoming

What does this mean?

- Making application forms and other materials available in accessible formats
- Setting up an accessible website
- Providing further and additional information as needed
- Informing candidate about their right to reasonable accommodation
- Highlight the organization's disability employment policy

Dealing with fears

Take into account that the candidate may more than likely be nervous about interviews as a result of previous experiences. By the same token, employers may also be anxious and have concerns whether the employee will be able to do the job and if productivity will be affected.

Education is key to successfully manage fears and uncertainties. Seek professional help assistance to shed light on the subject of disability.

It is also important to examine one's own perceptions, attitudes and assumptions.

Setting targets

Set clear targets and communicate these to managers and staff. Accountability is key, as targets will not yield results without it.

Job design

When filling a vacancy, consider if the job can be done differently, with a different set of skills or a combination of skills.

Consider:

- Working hours
 - Flexible hours
 - Shorter working hours
 - Time off to collect medication
- How the work environment can be adapted
 - Lower a desk
 - Building a ramp
 - Making bathroom facilities wheelchair accessible
 - Acquiring
 - Re-organizing workstations
- Can some elements of the job be re-assigned
- Provide supervision/a buddy/job coaches

1. Draw up a job profile and specifications for the job:

Position	Tasks	Essential functions	Skills and Capabilities
Cashier	Registers sales on a cash register by scanning items, itemizing and totalling customers' purchases. Resolves customer issues and answers questions. Bags purchases if needed. Processes return transactions. Collects payments by accepting cash or card payments from customers and makes change for cash customers.	Maintains checkout operations by following policies and procedures and reporting needed changes. Maintains a safe and clean working environment by complying with procedures, rules, and regulations. Maintain client relationships. Balances cash drawer by counting cash at beginning and end of work shift. Provides pricing information by answering questions.	Friendly and positive attitude Excellent customer service Excellent communication skills Ability to make change Basic math skills Attention to

2. Application forms

Paragraph 7.1.3. of The Code

Important:

- Application forms should focus on identifying the applicant's ability to perform the essential functions of the job.
- Wording should allow an applicant to voluntarily disclose their disability status.
- A statement regarding the non-discrimination practices according to the Act.

Step by step:

1. Identify the inherent requirements of the job
2. Clearly describe the necessary skills and capabilities
3. Set reasonable a selection-criteria for applicants, preferably in writing
4. Create application forms that focus on identifying an applicant's ability to perform inherent requirements of the position

Selection criteria may only be based on essential functions of the job.

Interviews (TAG page 28 – 30)

If the applicant has disclosed their disability or if it is self-evident, the employer:

1. Must focus on the applicant's qualification, not their disability
2. Make necessary reasonable accommodations during interview
3. Ask applicants to indicate how they would perform the essential functions of the job and what RA would be required

General Interview Etiquette

- You are interviewing an adult. Treat them with the same dignity and respect as you would anyone else.
- If you want to offer assistance, ask first. Be prepared to be refused.
- Use a normal tone of voice when welcoming the person. Do not raise your voice unless asked.
- Speak directly to the person, not their companion, interpreter or assistant.
- Allow the applicant time to consider your questions. Don't be afraid to repeat what you have understood and asking the applicant to confirm.

Selection (TAG page 27-29)

- Selection criteria should not unfairly discriminate against PWD.
- May not discriminate based solely on lack of relevant experience.
- Consider
 - Formal qualifications
 - Prior learning
 - Capacity to acquire the ability to do the work

IMPORTANT:

Employer may not request information about an actual or perceived disability from previous employers or 3rd parties when assessing whether an applicant is suitably qualified, without the WRITTEN consent of the applicant.

Conditional job offers (TAG page 30)

Do not make a job offer if reasonable accommodation cannot remove risks to the applicant or others.

Employer may attach certain conditions to a job offer for example medical or functional testing to determine ability to perform essential work functions with or without RAs.

Withdrawing a job offer if test show that (TAG page 30; Paragraph 7.4.5 of the Code)

- RA requirements would create unjustifiable hardship
- There is an object justification that relates to the inherent requirements of the job
- There is an objective justification that relates to health and safety.

Testing (TAG Chapter 8)

- Must be relevant to the employee's work
- The employer bears the cost

Employee benefits (TAG page 45)

- Cannot be refused membership of a benefit scheme on basis of disability

Orientation and initial training (TAG page 36)

- The placement process can be facilitated by the employer or with the assistance of an external organization.
- Placement must be followed by a comprehensive orientation and induction training process.
- It should include disability sensitization of other colleagues. The process should guarantee that all stakeholders are given the skills to succeed in this new relationship and ensure that bias and prejudices are not tolerated.
- During the induction of the new employee, reasonable accommodations must be offered, and the training must be accessible.

Training and career advancement (TAG chapter 10)

- Anything that falls outside of essential job functions should not be evaluated.
- The training policy should mirror the Employment Equity Plan.
- Ensure career paths are made clear and are well defined.
- Training must be accessible, fair and without discrimination.

Retaining people with disabilities (TAG Chapter 11)

- Employees who become disabled
 - Access to benefits
 - Compliance with the Act
 - Identification of essential job functions
 - Classification of work limitations
- Development of job modifications and return-to-work options
- Consultation with employees
- Early return-to-work

Termination of employment (TAG Chapter 12)

- Right to terminate
- Dismissal based on operational requirements
- Guidelines for people with disabilities

Commitment

- From leaders, managers and disability champions: numerical goals, resources and workplace culture issues.

Workplace audit

- Culture assessment to identify numbers, practices trends and current return-to-work practices Integrate with the EEA Section 19 analysis plans → set targets

Secure resources

- Human resources to support the implementation team

Develop a framework

- Focus on policies and legal obligations; clarify targets, time frames and resource allocations

Integrate other people processes

- Workforce planning, employment equity and skills development plans and processes
- Build capacity through training and awareness
- Measure results and communicate outcomes and progress

Practical Tools

Policies and Practices Profiling Tool

1. Does your company have a policy related to the employment of persons with disabilities?

a.	Yes	
b.	No	
c.	In the process of developing one	
d.	Don't know	

2. If yes, are these policies aligned with any SA legislations/policies/guidelines?

a.	Yes	
b.	No	
c.	Don't know	

If yes, please state the policy/ies or legislation your own policy is aligned with:

3. Is your organization aware of the following policies, guidelines and legislation in SA that govern employment?

a.	Employment Equity Act	
b.	The Code of Good Practice on the Employment of Persons with Disabilities	
c.	The Technical Assistance Guidelines (TAG) on employing people with disabilities	
d.	Skills Development Act	

4. Does your organization actively seek to recruit job applicants who are persons with disabilities?

a.	Yes	
b.	No	
c.	Don't know	

5. Do you have statistical information on the number of persons with disabilities per category?

	Category	Yes	No	Don't know
a.	Physical Disability			
b.	Mental illness			
c.	Visually impaired			
d.	Hearing impaired			
e.	Multiple Disabilities (more than one)			
f.	Other (please indicate)			

6. Did any employees become disabled while employed by the organization?

a.	Yes	
b.	No	
c.	Don't know	

7. If yes, did the employee return to work?

a.	Yes	
b.	No	
c.	Don't know	

8. Does your company reasonably accommodate employees with disabilities?

a.	Yes	
b.	No	
c.	Don't know what reasonable accommodation measures are	

9. Has the work force been sensitized regarding disability in the workplace?

a.	Yes	
b.	No	

10. Please indicate the barrier(s) (if any) that the organization encounters when hiring a person with a disability:

a.	Physical environmental barriers (inaccessible buildings)	
b.	Stigma, stereotyping, attitudes	
c.	Financial implications for accommodation	
d.	Lack of knowledge of reasonable accommodation	
e.	Lack of qualification of person with disability	
f.	Employees not willing to disclose	
g.	Additional cost of supervision	
h.	No barriers	

11. Do you have employee resources or interest groups that address disability related issues?

a.	Yes	
b.	No	
c.	Don't know	

12.	Do you ask candidates if they require reasonable accommodations during interviews?	Yes	No
13.	Is your website accessible to persons with disabilities		
14.	Are job advertisements available in a variety of accessible formats?		
15.	Do you offer disability and diversity training to all staff?		
16.	Do you have regular anti-stigma campaigns?		
17.	Does the company have a separate budget for disability related issues such as training, workspace adaptations etc.?		
18.	Are your stores wheelchair accessible?		
19.	Does the company offer transport for persons with disabilities to get to work?		
20.	Does the company have emergency evacuations policies and procedures in place?		

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