

Towards Inclusive Employment:

*Employment and Reasonable
Accommodation for Hard of
Hearing People in Europe*

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ABOUT EFHOH

The **European Federation of Hard of Hearing People** (EFHOH), established in 1993, is a non-profit organization representing hard of hearing and late-deafened individuals across Europe. EFHOH advocates for awareness and practical actions to eliminate barriers to access affordable hearing care and rehabilitation and create an accessible society through public services and assistive technologies.

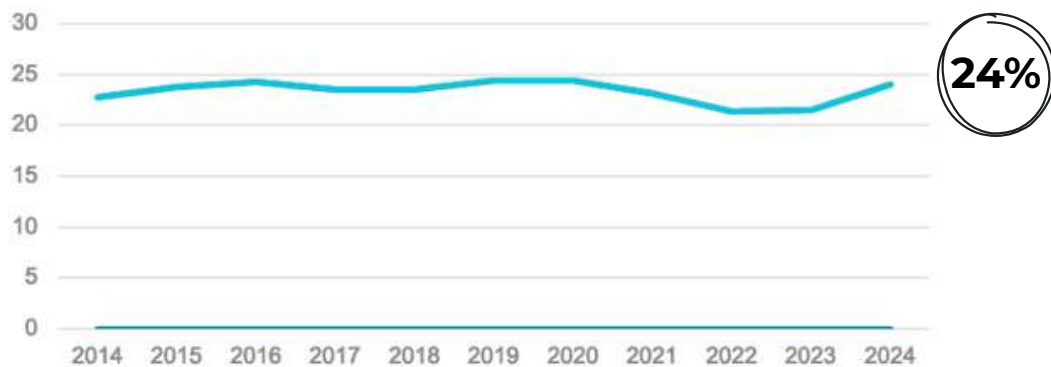
Its main objective is to protect and promote the rights of individuals with hearing loss in Europe, facilitating legislative and social protections through collaboration with members and stakeholders.

INTRODUCTION

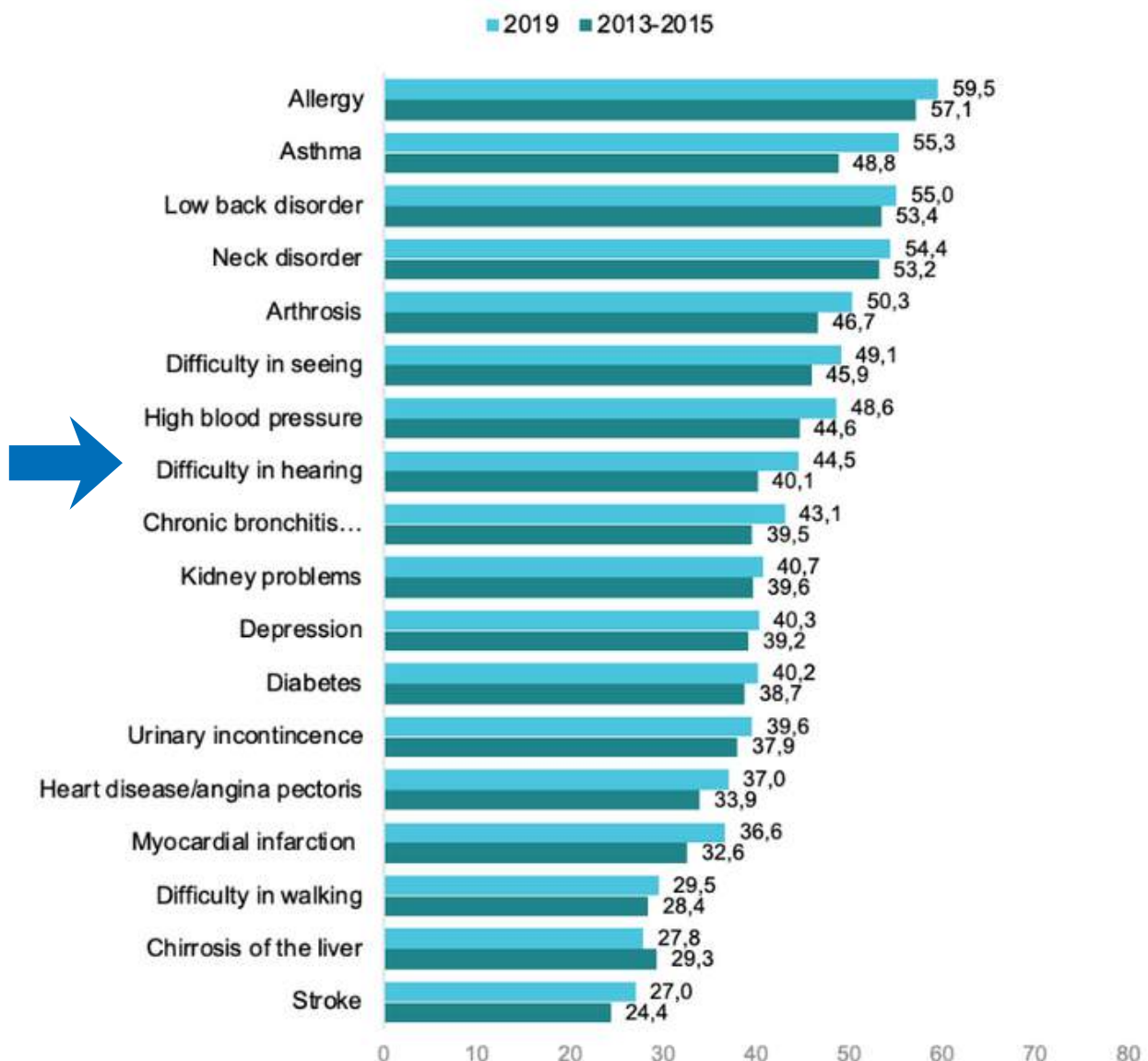
Hard of hearing individuals have mild to severe hearing loss but often use spoken language to communicate and rely on assistive devices like hearing aids or cochlear implants. The hard of hearing community can also benefit from visual cues, like lipreading and speech-to-text tools, to facilitate communication. Deafened people, conversely, have lost their hearing after having acquired spoken language, and rely on a combination of spoken language, assistive devices, and visual cues to communicate.

With **59 million people** in Europe experiencing hearing loss, many still face significant barriers to employment. The recent European data shows that hard of hearing people remain at a disadvantage in the European labour market. Across the EU, **persons with disabilities have an employment rate of 51%, compared to 75% for those without disabilities, leaving an employment gap of almost 24%** (Eurostat, 2022).

Disability employment gap (pp), EU



Reading further, statistics from the European Commission also show that people with hearing loss have one of the lowest employment rates among persons with disabilities, with around **40–44% in employment** in both 2013–2015 and 2019, confirming that hearing loss continues to be a significant barrier to equal access to work in the EU.



While Eurostat data show that persons with disabilities, including those with hearing loss, have consistently lower employment rates across Europe, additional evidence specific to hearing loss confirms the same pattern of disadvantage. We have also come across another data from the International Federation of Hard of Hearing Young People (IFHOHYP), indicating that people with hearing loss are more likely to be underemployed, concentrated in lower-status jobs, or to leave employment early due to fatigue and inaccessible environments. Findings from the EFHOH report Experiences of late deafened people in Europe (2018) reveal that only 45% of respondents kept their job after losing hearing, **67% struggled to find new employment, and 60% reported anxiety or depression**, most without access to counselling or support.

This report is part of the **Citizens, Equality, Rights and Values Programme** (CERV) action, **funded by the European Union**, and aims to examine how reasonable accommodation is provided, or denied, to hard of hearing people across Europe. Reasonable accommodation is central to equal employment: it refers to the modifications and adjustments needed to ensure persons with disabilities can work on an equal basis with others, unless such measures impose a disproportionate burden.

For hard of hearing people, this often means captioning and speech-to-text tools, induction loops and assistive listening devices, accessible recruitment processes, and flexible working arrangements. Without these adjustments, equal access to employment remains low.

The survey on which this report is based reveals a persistent gap between legal commitments and practical implementation. While many countries have legal frameworks recognising disability rights, in practice, access to reasonable accommodation is often conditional, fragmented, and dependent on an individual's ability to self-advocate. Recognition requirements, uneven cost-sharing mechanisms, and weak enforcement systems mean that rights exist “on paper” but are frequently undermined in practice.



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1. EXECUTIVE SUMMARY

Purpose and scope

The purpose of this report is to provide a comparative overview of how reasonable accommodation is recognised, funded, and delivered for hard of hearing people across Europe. By examining national approaches, identifying recurring barriers, and highlighting good practices, the report seeks to test the effectiveness of existing legal frameworks, most notably the EU Employment Equality Directive and the UN Convention on the Rights of Persons with Disabilities (CRPD), and to provide evidence-based recommendations for stronger and more consistent implementation.

What is reasonable accommodation and why does it matter?

The concept of reasonable accommodation is central to both international and European disability rights law. The UN Convention on the Rights of Persons with Disabilities (CRPD), in Article 2, defines reasonable accommodation as

“necessary and appropriate modifications and adjustments... to ensure persons with disabilities the enjoyment or exercise on an equal basis with others of all human rights and fundamental freedoms.”

Article 27 specifically requires States Parties to recognise the right of persons with disabilities to work and to prohibit discrimination based on disability, including the denial of reasonable accommodation.

At the European level, the Employment Equality Directive (2000/78/EC) obliges employers to provide reasonable accommodation for workers with disabilities. In 2024, the European Commission published non-binding Guidelines on Reasonable Accommodation at Work, intended to clarify employer obligations and promote good practices across Member States.

These instruments establish a robust normative framework, but their effectiveness depends on national implementation, employer awareness, and accessible enforcement mechanisms.

For hard of hearing people, reasonable accommodation is usually about **communication access and hearing loss-friendly environments**. This includes captioning, speech-to-text services, hearing loops, visual alarms, accessible interview procedures, flexible working time to address fatigue, and practical measures such as ensuring good lighting for lipreading. Other adaptations are equally essential: communicating by email or chat instead of phone calls, using video calls where lipreading is possible, and providing written notes or summaries instead of oral instructions.

To make online and hybrid meetings inclusive, organisers must plan accessibility from the start: provide materials in advance, announce available captioning or interpreting services, use chat to summarise actions and key points, remind speakers to keep their video on and microphones muted when not speaking, and schedule regular breaks to reduce cognitive overload. Sending transcripts or chat summaries afterwards benefits everyone, not only deaf and hard of hearing participants.

International standards such as the [ITU Guidelines for Supporting Remote Participation in Meetings for All](#) define these measures as essential and stress that accessibility features, including real-time captioning, clear audio streaming, accessible registration, and the ability to interact via text or video, are integral to equal participation.



Ultimately, reasonable accommodation is not about technology alone but about communication culture. When employers and meeting organisers plan accessibility proactively, whether in physical or virtual spaces, they remove barriers before they appear.

These accommodations are not optional add-ons, they are legal entitlements and essential to equal participation. Without them, hard of hearing workers remain excluded from employment opportunities, under constant pressure to adapt without support.

Methodology

The report is based on a structured survey conducted from the end of July to mid-September 2025 among member organisations of hard of hearing people and other national organisations representing hard of hearing communities. In total, **22 responses were collected from 18 European countries**. In some countries, multiple organisations provided perspectives, which allowed for a richer picture of national practices. For the comparative analysis, results were grouped by country while retaining differences in perception or implementation when they revealed important contrasts.

The responding countries were: Austria, Czech Republic, Denmark, Estonia, Finland (2 organisations), France, Germany, Hungary, Iceland, Malta, Netherlands (3 organisations), Norway, Poland, Portugal, Slovenia, Spain, Sweden (2 organisations), and the United Kingdom.



The survey consisted of **12 questions** combining closed, multiple-choice, and open-ended formats.

Questions addressed the inclusion of hard of hearing people in employment and social protection, the requirements for accessing reasonable accommodation, accessibility in recruitment and in the workplace, funding models, barriers to employment, complaint and enforcement mechanisms, awareness of EU Guidelines, and examples of good practices.

The calculations presented in this report, therefore, reflect **country-level coverage** while recognising that local realities and sectoral experiences vary.

Why this survey is relevant

Despite the EU's legal commitments and the CRPD's binding obligations, the **employment gap between persons with and without disabilities remains high**. For hard of hearing people, the challenges are compounded by the “invisibility” of hearing loss: because it is not always recognised as a disability, many workers are denied accommodations or are forced to navigate complex certification systems to prove eligibility.

In 2022, the European Commission launched the Disability Employment Package, a flagship initiative within the European Disability Rights Strategy 2021-2030, to support Member States in improving labour-market outcomes for persons with disabilities, including through concrete actions on **reasonable accommodation at work**.

By bringing together the experiences of hard of hearing organisations across 18 countries, this survey provides comparative perspectives on how, or if, reasonable accommodation is provided for hard of hearing people across Europe. It highlights not only the systemic barriers that persist but also the good practices that demonstrate what effective, inclusive employment can look like when laws are properly implemented.



2. FINDINGS AND COMPARATIVE ANALYSIS

Access to employment and inclusion

Across all surveyed countries, hard of hearing people are formally included in national employment and social protection frameworks. Every respondent confirmed that some legal or policy basis exists, either through general disability legislation or equality acts, but almost all stressed that inclusion remains largely ineffective in practice. However, **70% describe this inclusion as ineffective or conditional**, mainly due to weak enforcement, bureaucratic procedures, and lack of employer awareness.

Only **around 30% of countries**, primarily in Northern and Western Europe, **report effective mechanisms**, where inclusion is promoted through strong equality laws and supported by welfare systems. Yet even in these countries, practice is inconsistent. Respondents from Sweden and Finland both noted that while inclusion is guaranteed by law, the systems are fragmented and often slow to deliver.

“The system is patched and not clear even to the professionals working with it.” - Participant from Sweden

In **Central and Southern Europe**, the pattern is different. Legal inclusion is achieved primarily through **general disability laws**, but specific measures for people with hearing loss are rarely implemented.

“Inclusion of hard of hearing people, including deafened people, is lacking effectiveness in France. Much is to be done.”
– Participant from France

A similar concern was raised in **Slovenia** and **Hungary**, where formal quotas and employment programs exist but remain underused:

“Employers receive employment assistance with ‘reasonable adjustments’ but unfortunately they still do not make enough use of state assistance.” –
Participant from Slovenia

“Government responsibility covers these, but they are still rudimentary and mild; full and wide coverage would be needed.” –
Participant from Hungary

These testimonies illustrate that legal recognition does not automatically translate into real inclusion. Laws that place hard of hearing people under the broad disability category can render them *invisible* within systems designed mainly for physical or visible disabilities.

By contrast, respondents from the **UK** and **Portugal** emphasised that inclusion policies exist and can work well when combined with targeted schemes.

The UK’s Access to Work programme and Portugal’s *Employment Support Programme for Persons with Disabilities* were both cited as examples of accessible, rights-based mechanisms, although delays, bureaucracy, and uneven awareness continue to limit their impact.

Such findings show a persistent *implementation gap* across Europe that lies less in legislation than in implementation capacity, employer awareness, and availability of funding. In countries where state agencies actively support employers, such as **Finland**, **Norway**, and the **UK**, participation is higher. Where responsibility falls mainly on individuals or employers, as in many Central and Eastern European countries, inclusion remains conditional and inconsistent.

Requirements for recognising reasonable accommodation

The survey reveals two main models governing access to reasonable accommodation:

1. A **disability proof-based model**, where eligibility depends on official certification of disability;
2. A **rights-based model**, where accommodation is linked to an employee's needs and employer awareness rather than formal recognition.

The **disability proof-based model** can add to further barriers to access reasonable accommodation for hard of hearing employees, as the assessment models are based on medical tests and often do not fully account for social barriers that hard of hearing people face.

The tests are often based on pure audiometry conducted in soundproof booths, which do not reflect daily distractions, the distance of speakers or noisy environments workers deal with on a day-to-day basis. As a result, many people with hearing loss might not meet the official disability threshold, even though they face communication difficulties at work.

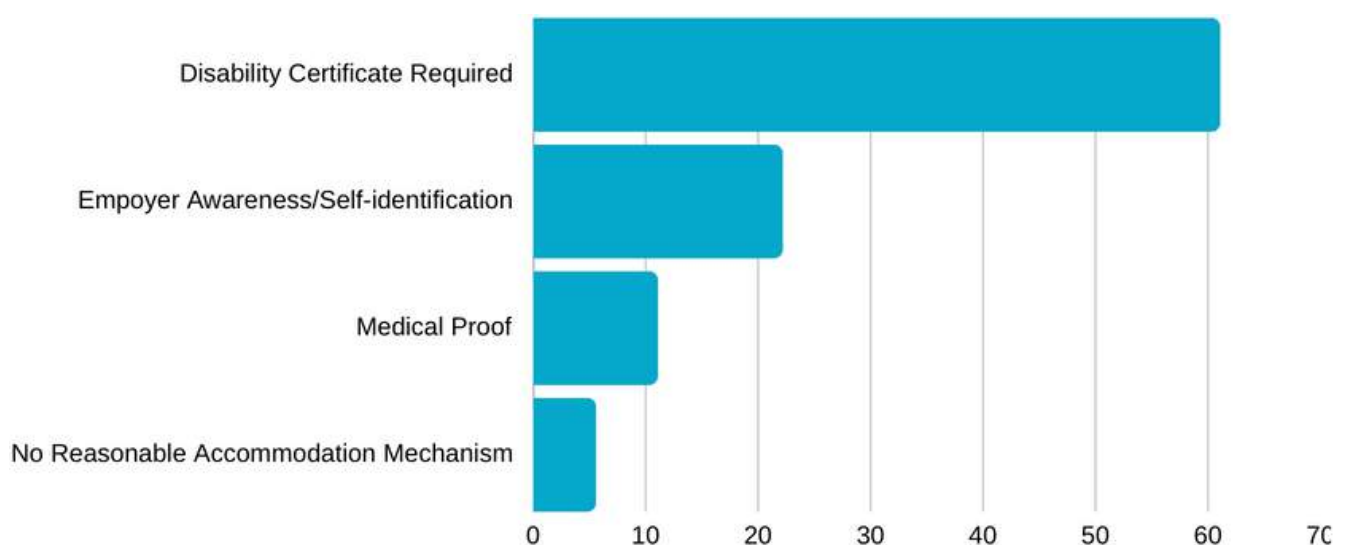
A **rights-based approach** offers a fairer alternative by focusing on the barriers people face in their work environment rather than measuring eligibility and recognises that accessibility is a shared responsibility, not an individual burden.

Despite increasing awareness of inclusive approaches, the **disability proof-based model remains dominant**. Across the 18 countries surveyed, **61.1% require an official disability certificate** to grant accommodations.



A smaller share, **11.1%**, demands *medical proof* such as a doctor's note or audiological assessment. Only **22.2%** of countries use a more flexible, rights-based approach, where employer awareness or self-identification triggers the right to accommodation, and just **5.6%** have no functioning mechanism at all.

***Access to Reasonable Accommodation
for Hard of Hearing people in Europe (%)***



This divide shows that, in most of Europe, the right to reasonable accommodation is still **conditional** rather than automatic or rights-based. As respondents repeatedly stressed, access depends not on the existence of need but on *proving* hearing loss within a bureaucratic or proof-based framework.

“Employees can only receive assistance if their disability is officially recognized.” – Participant from Austria

These formal systems, while designed to ensure accountability, create barriers that discourage disclosure (bureaucracy) and exclude many individuals with hearing loss who do not meet strict medical thresholds. The process can be lengthy, stigmatizing, and dependent on medical assessments that may not reflect concrete hard of hearing people's needs at work.

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By contrast, a smaller group of countries applies a **rights-based or mixed model** that focuses on accessibility needs rather than certified disability. Finland and Estonia are notable examples.

“Employers have to actively make reasonable accommodations unprompted when they are aware that their employee has a disability. That is required by law.” – Participant from Finland

“Disability is not required to receive a service. For example, to receive a written translation, a medical certificate is sufficient.” – Participant from Estonia

Sweden combines both elements: employees may apply directly to state agencies with medical proof, but the obligation to accommodate lies primarily with the employer once needs are identified.

Certification-based systems tie the right to accommodation to diagnosis rather than to the removal of barriers. This approach delays access, limits flexibility, and reinforces the medical model of disability. Conversely, the few countries adopting rights-based approaches, mainly in Northern Europe, demonstrate a more inclusive framework but still face administrative fragmentation and limited awareness among employers.

Recruitment stage

The recruitment phase emerged as the **weakest point** in the employment process for hard of hearing people across Europe.

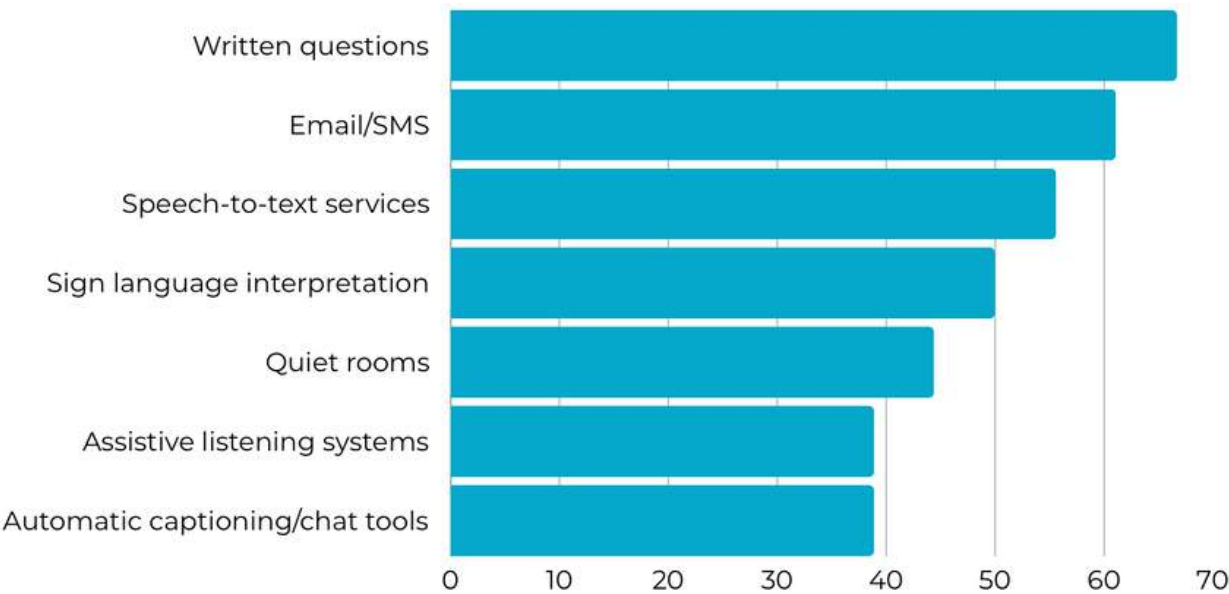
While many respondents confirmed that reasonable accommodations *can* be arranged at the application or interview stage, almost all clarified that this is **not automatic** and depends on individual initiative and employer willingness.

For example, in **France** and the **Czech Republic**, no specific accommodations are guaranteed unless the applicant explicitly requests them in advance, and even then, support is not systematic.

“Nothing is automatically provided from the offer. Everything must be arranged in advance by the applicant, and it depends on whether the employer is willing to participate.” – Participant from Czech Republic

Across the 18-country dataset, the following accommodations were most frequently mentioned as *available or potentially available* during recruitment: written questions (66.7%), email or SMS communication (61.1%), and speech-to-text (live captioning) (55.6%), sign language interpretation (50%), quiet rooms (44.4%), assistive listening systems (38.9%), or video platforms with captioning or chat tools (38.9%).

What reasonable accommodations are provided for the recruitment/interview process? (%)



However, these numbers reflect *potential* availability rather than consistent practice. The vast majority of respondents emphasised that **accommodations depend on the candidate's own request and initiative**. In some countries, public systems can support employers with interview accessibility, but awareness is low. In **Spain**, interpreters or captioning are rarely provided, while in **Estonia**, assistance can sometimes be arranged through the *Unemployment Insurance Fund*, but only if planned in advance.

Despite widespread shortcomings, some **good practices** were highlighted:

- **United Kingdom:** The *Access to Work* scheme can cover communication support for job interviews, such as real-time captioning or a BSL interpreter.
- **Portugal:** The national employment service allows applicants to request written questions and email contact as an accessibility measure.
- **Denmark:** Employers can be reimbursed for interpreter costs even for short recruitment processes.
- **Finland:** Solo interviews instead of group interviews are used as a reasonable accommodation.

These examples demonstrate that inclusive recruitment is possible when systems are flexible and awareness is high. Yet, they remain exceptions rather than the norm.

“It depends on the employer whether accommodations are provided or not. Employers are not willing to make expenses for this.” – Participant from Estonia

Overall, **recruitment accessibility remains the least regulated part** of employment. Whereas workplace accommodations are sometimes standardised through social insurance or employment funds, recruitment adjustments often fall into a grey zone, outside formal entitlement and heavily reliant on personal negotiation.

The lack of automatic or systemic recruitment accommodations creates an invisible barrier that filters out qualified candidates before they even enter the labour market. Inclusive hiring, therefore, requires not only legal recognition of the right to reasonable accommodation but also proactive measures, such as standard accessibility options in job portals, interview captioning, and state funding for communication support.



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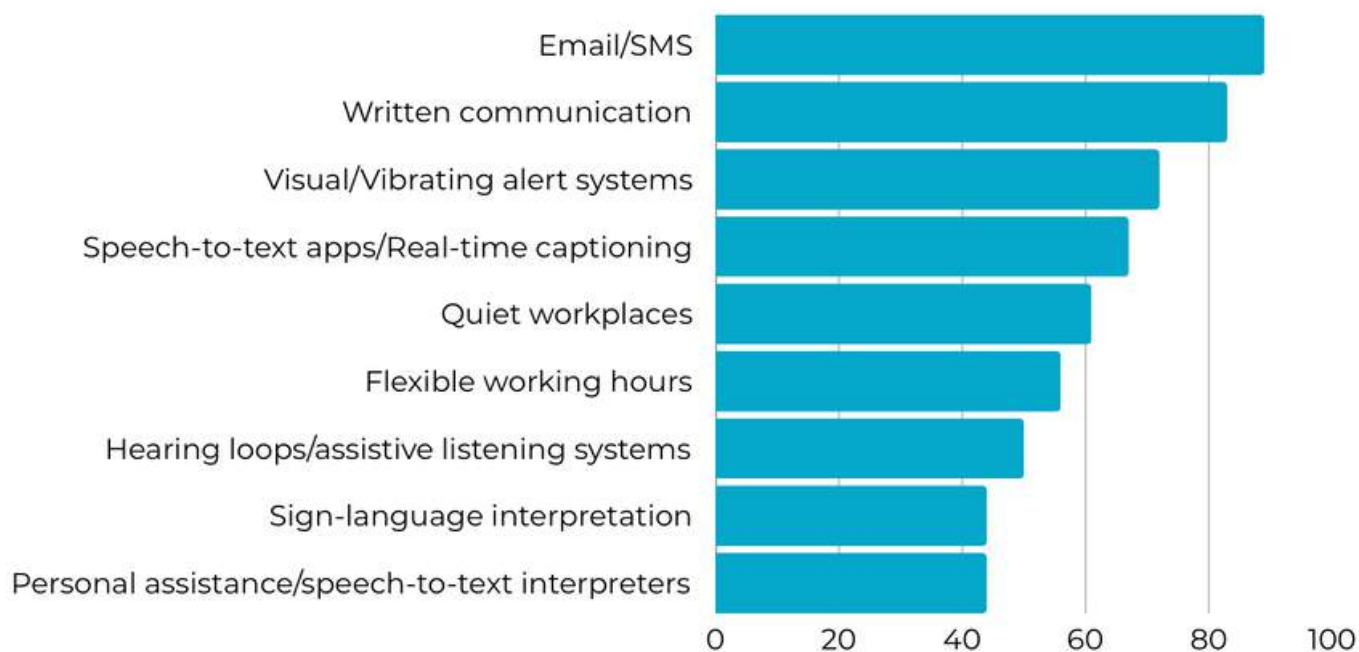
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Workplace accommodations

Across all countries surveyed, the majority of hard of hearing employees rely on a combination of communication, environmental, and technological adjustments to perform effectively at work. Yet the scope and consistency of these accommodations vary widely depending on public funding, employer awareness, and whether hearing loss is officially recognised as a disability.

What forms of reasonable accommodations or adjustments are typically available in the workplace for people with hearing loss? (%)



The most common accommodations are **written and digital communication tools**, respectively reported in **83% and 89% of the countries**. Almost every respondent confirmed that email, chat tools, or written meeting minutes and summaries are standard alternatives to phone calls and verbal instructions.



Environmental and organisational measures such as quiet workspaces, good acoustics, and flexible working hours were mentioned by about **60%** of respondents. These are essential to reduce communication fatigue and stress, but their use depends on the workplace culture.

Access to **assistive listening technologies**, real-time captioning, speech-to-text services, personal microphones, and hearing loop systems, remains uneven. Around **67%** of countries provide access to captioning or speech-to-text apps, but usually on request and often dependent on public funding. **Hearing loops and FM systems** are available in about **50%** of the countries, primarily in larger institutions or public-sector buildings. In Germany and Austria, these are funded through integration offices, while in southern and eastern Europe they rely on employer initiative.

Sign-language or speech-to-text interpretation is available in **44%** of cases, generally limited to workers with **official disability recognition**. This reflects a wider pattern: where hearing loss is formally acknowledged as a disability, state support follows; where it is not, access to accommodations becomes discretionary or refused.



Awareness training for colleagues and supervisors, reported in **50%** of countries, is the measure most directly linked to inclusion culture. However, it is rarely mandatory and largely driven by NGOs or disability organisations rather than employer policy

In practice, workplace accessibility remains fragmented. While most European countries guarantee reasonable accommodation in law, its realisation still depends on employer initiative, individual negotiation, and eligibility tied to disability status. Even basic measures such as visual alert systems, present in about **70%** of responses, are inconsistently applied.

“Access to formal support and funding typically requires certified disability status, although some employers may adopt inclusive practices independently.” - Participant from Portugal

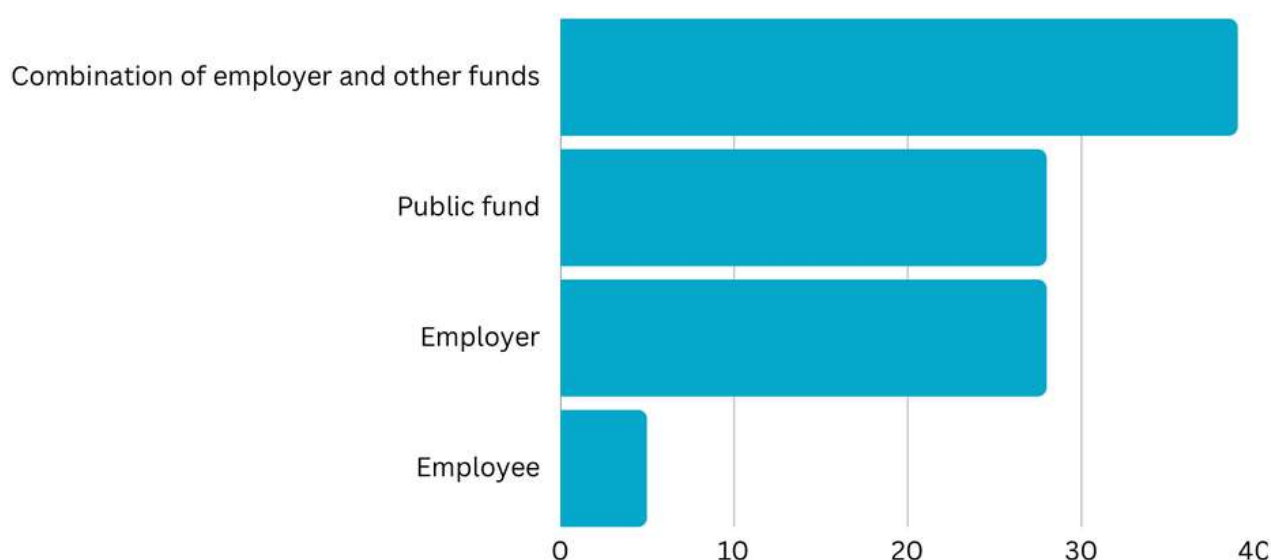
Even when laws guarantee the right to accommodation, implementation depends on enforcement, employer awareness, and cost-sharing schemes. Tools and rights exist, but only those officially “recognised” can use them, leaving many hard of hearing workers in a grey area between inclusion and exclusion and expected to self-advocate and often negotiate solutions themselves.

Cost coverage

The way costs for reasonable accommodation are shared or financed is one of the strongest indicators of how effectively inclusion works in practice. While every country recognises the principle that adjustments should be made, the extent to which employers, the state, or individuals must pay varies widely.

Across the 18 countries analysed, four clear patterns emerged. About **39%** of the countries operate with a **shared-cost model**, in which expenses are divided between employers and public funds or social insurance agencies. Roughly **28%** rely primarily on **publicly funded schemes**, where the state or welfare system pays most of the costs. Another **28%** place the main responsibility on the **employer**, and around **5%** of respondents reported cases where the **employee** must pay out of pocket for at least part of the support they need.

Who typically covers the cost of these accommodations in employment? (%)



The way costs for reasonable accommodation are shared or financed is one of the strongest indicators of how effectively inclusion works in practice. While every country recognises the principle that adjustments should be made, the extent to which employers, the state, or individuals must pay varies widely.

This approach was described as the most balanced and effective because it removes the financial disincentive for employers while keeping their legal duty to act. For example, in **Spain**, workplace adaptations are covered jointly by the *Public Employment Service of Catalonia* and the employer, with social organisations sometimes stepping in temporarily. Publicly financed systems are concentrated in Nordic and Western Europe and are strongly linked to higher implementation rates.

The UK's Access to Work programme was cited as a model of good practice: ***“Depending on what support is required, different levels of assistance are provided by Access to Work. One-hundred percent of communication support or support-worker costs are paid by AtW up to £57,000 per employee.”***

Norway follows a similar structure: *“A combination of employer and the Norwegian Labour and Welfare Administration,”* where the public agency covers most of the expense. **Denmark** and **Finland** also provide substantial state reimbursements for technical aids or interpreters, even for short-term or part-time contracts.

By contrast, in countries where **employers must bear the full cost**, implementation is more sporadic. Respondents from the **Czech Republic**, **Austria**, and **France** explained that while reasonable accommodation is mentioned in legislation, there are no dedicated funding mechanisms and companies act voluntarily. This creates unequal access between large and small enterprises and leaves many hard of hearing workers dependent on individual goodwill.

Barriers to employment

All respondents identified persistent barriers preventing hard of hearing and deafened people from entering or staying in work. The obstacles fall into three main categories, **attitudinal, structural, and communicational**, and appear across every country surveyed, though their severity varies.



Discrimination, stigma, and unawareness of hearing loss were the most recurrent barriers. In more than **90%** of responses, discrimination and stigma were described as constant challenges. Employers' misconceptions about hearing loss remain widespread, particularly in small and medium enterprises.

This pattern is somewhat less pronounced in Nordic countries, where awareness training and equality laws are stronger, but prejudice still exists in hiring.

What are the most common barriers people with hearing loss face in keeping or finding a job? (%)



Roughly two-thirds of the countries noted that **laws are poorly enforced or procedures are too complex**, especially for small employers. Several Central and Eastern European organisations emphasized that national legislation recognises disability rights, yet implementation is “ineffective or conditional.”

In **France** and **Austria**, respondents called inclusion “lacking effectiveness.” In **Slovenia** and the **Czech Republic**, employment quotas exist but are misused or companies prefer paying penalties to hiring staff with disabilities. Limited funding and fragmented responsibilities between ministries add to the problem.

Communication accessibility is still the weakest area. More than **80%** of the sample mentioned problems with meetings, phone use, and acoustics. Even when hearing aids or loops are available, background noise, poor lighting, and fast-paced discussions prevent equal participation. **Finland**, **Sweden**, and **Denmark** reported fatigue as a leading cause of reduced working hours.

“The most common barrier to keep a job is fatigue. Many people with hearing loss choose to work part-time if possible.” – Participant from Finland

The overall pattern shows a **North-West vs. Central/Eastern divide**. Nordic and Western Europe, supported by public funding and stronger anti-discrimination agencies, face mainly attitudinal and awareness-based barriers. Central and Eastern Europe combine these with structural shortcomings, such as weak enforcement, limited technology, and few accessible training opportunities. Across Europe, attitudinal bias and low awareness remain constant, but their impact is compounded by uneven infrastructure.

Complaint and enforcement mechanisms

Most countries have formal channels to address discrimination or denial of reasonable accommodation, but **complex procedures and low trust** mean these mechanisms are rarely used. All respondents confirmed the existence of **legal recourse**, typically through equality bodies, labour courts, or ombudspersons.

- In **Finland**, workers can appeal to the **Non-Discrimination Ombudsman** or the **Occupational Safety and Health Administration**.
- In **Hungary**, complaints can be filed with the **Commissioner for Fundamental Rights** or through **labour courts**.
- **France** and **Germany** rely on labour tribunals, often supported by disability ombudsman services.
- **Estonia** allows complaints to the **Chancellor of Justice**, which includes a disability rights advisory board.
- The **UK** uses **Employment Tribunals** under the Equality Act 2010, though many employees *“just quit and look for a new employer”* rather than pursuing lengthy cases.

Across these systems, enforcement gaps remain profound. **France, Slovenia** and **Austria** claimed that legal cases may last several years and specialised legal expertise is scarce.

The main deterrents to filing complaints are:

- fear of retaliation or job loss,
- the complexity and cost of legal procedures,
- lack of awareness about available remedies.



In countries with strong institutional mediation, such as Finland and Estonia, the presence of **ombudsman-led dialogue** makes enforcement somewhat more approachable. However, in most cases, the system remains **reactive rather than preventive**.

Good practices and positive examples

Despite significant gaps in implementation, several countries and organisations demonstrate how effective workplace accommodation can be achieved when **responsibility, funding, and awareness** are aligned.

In the **UK**, the *Access to Work* programme remains one of the strongest models in Europe. It can fully fund (100%) communication support such as real-time captioners and sign language interpreters, as well as personal assistance. Other forms of workplace support, for example, specialist equipment or adaptations, are also funded but may be partially cost-shared with the employer, up to an annual maximum of £57,000 per person.

Norway guarantees free interpretation services for employees with hearing loss, fully covered by the government. This ensures equal participation in meetings and training, regardless of employer size or resources.



Finland offers a dual model in which employers are reimbursed up to €4,000 for accessibility adaptations, while the Social Insurance Institution directly funds sign-language and speech-to-text interpretation. Finland emphasised that “employers have to make reasonable accommodations unprompted when they are aware that their employee has a disability.”

Denmark allows reimbursement for technical support, interpreters, and short-term accommodations through a state-funded community service, making flexibility one of its main strengths.

Spain's Audivers 360 project stands out as an innovative non-governmental initiative that combines employment training with awareness-raising. Using immersive simulations, it helps hard of hearing job-seekers practice interviews and workplace communication while simultaneously training employers on accessibility and inclusion.

These examples illustrate that **effective practice depends less on technology itself than on institutional responsibility and funding continuity**. When the financial burden is lifted from the individual and clear systems exist for requesting support, accessibility becomes an essential part of working environments rather than exceptional.

Awareness of the EU Commission's Guidelines on Reasonable Accommodation at Work

When asked about awareness and perceived usefulness of the **EU Commission's 2023 Guidelines on Reasonable Accommodation at Work**, responses revealed limited visibility and mixed opinions.

- **12 out of 18 countries (67%)** were aware of the Guidelines.
- **6 countries (33%)** had no awareness or had not reviewed the document.

Awareness was highest among national hard of hearing organizations in **Western and Northern Europe** (UK, Finland, Denmark, Norway, Portugal, Spain) and lowest in smaller **Central and Eastern European** associations, where dissemination from the EU level remains weak.

This lack of visibility matters: when organisations working directly with hard of hearing people are unaware of the Guidelines, they cannot use them to monitor governments or advise employers. Likewise, when public authorities lack familiarity, **state systems risk remaining inaccessible or non-compliant by default**, perpetuating a cycle in which inclusion depends on individual effort rather than institutional duty.



Among those familiar with the document:

- **About half (nine countries)** found the Guidelines useful for “*enhancing existing inclusive practices.*”
- **A smaller group (three to four countries)** considered them “*too general*” or “*not adding to existing policies unless legally binding.*”

“The Guidelines are a very long read (114 pages) and less suitable for smaller companies to act upon... They contain useful tips and best practices, but the user experience could be improved.” – Participant from the Netherlands

Almost all countries emphasised that without enforcement, guidance remains largely symbolic. Others expressed the need for the Guidelines to evolve into a binding instrument or serve as a strong reference for national advocacy, with targeted dissemination to employers and enterprises.

3. REPORT RECOMMENDATIONS

Strengthen the national and policy framework

- Embed the principles of the **EU Guidelines on Reasonable Accommodation at Work** within national equality and employment legislation to ensure that they are binding, enforceable, and systematically applied in both the public and private sectors.
- Define **reasonable accommodation** in national law in a way that explicitly includes **communication accessibility** for deaf and hard of hearing persons, covering captioning, assistive listening systems, and accessible communication tools.
- Promote a **social, proactive and rights-based model of disability**, replacing the disability-proof approach, to guarantee access to reasonable accommodation based on need and awareness.

Ensure effective enforcement and accountability

- Establish or strengthen **national monitoring mechanisms** under the equality body or labour inspectorate to assess the implementation of reasonable accommodation in public and private workplaces.
- Introduce regular **reporting on accessible and inclusive measures** in employment, including indicators on funding, good practices, and employment retention of hard of hearing workers.
- Guarantee that complaint and redress procedures are accessible, timely, and free of retaliation risk for workers reporting discrimination or denial of accommodation.

- Consult and involve national organisations of hard of hearing people in the implementation and monitoring of EU accessibility and employment laws, ensuring that lived experience directly informs national legislation, guidance, and enforcement strategies.

Guarantee sustainable public funding

- Create dedicated **funding schemes** to support employers, especially SMEs, in covering the cost of reasonable accommodation, including communication support and assistive technologies.
- Use EU funds such as **European Social Fund Plus (ESF+), the European Regional Development Fund (ERDF), and the Recovery and Resilience Facility (RRF)** strategically to improve accessibility in workplaces.
- Ensure that **funding programmes** are transparent, easy to access, and open to individual workers as well as employers.

Build capacity, awareness, and participation

- Provide **training programmes** for employers and HR professionals on communication accessibility and inclusive recruitment practices for hard of hearing workers.
- Develop **national toolkits and sectoral guidance** in cooperation with organisations of hard of hearing people.
- Engage **organisations of hard of hearing people** in the design, implementation, and evaluation of employment policies.
- Launch **public awareness campaigns** to challenge stereotypes about hearing loss and highlight accessibility as a driver of productivity and equality.

Lead by example – From Member States to EU Institutions

- **EU institutions and agencies have a leading role to play as model employers** of accessibility by integrating full hearing accessibility in their work environment, recruitment, meetings, and digital communications.
- Require all EU institutions recruitment and employment practices to be inclusive for hard of hearing employees, including captioning provision.
- Encourage **Member States to follow this model** by integrating hearing accessibility into public administration, employment services, and publicly funded workplaces. **Governments should ensure that accessibility is mainstreamed** into national employment programmes, procurement policies, and civil service recruitment.
- As part of the European Semester or Disability Platform reporting, Member States should be required to **report on how accessibility is implemented** in their public institutions and how they are ensuring compliance with the Employment Equality Directive.
- Recognise accessibility as a **cross-cutting principle of good governance**, aligning with the UN CRPD and the EU's commitment to a barrier-free Union.

4. CONCLUSION

The evidence gathered across 18 European countries reveals a consistent paradox: hard of hearing people are formally included in employment and disability frameworks, yet excluded in practice. In many Member States, laws exist to guarantee equality and reasonable accommodation, but in most cases, their application depends on individual negotiation, administrative recognition, or employer discretion.

Countries that combine public funding with institutional responsibility demonstrate that inclusion is possible when accessibility is treated as a right, not a favour. Elsewhere, the lack of coordination, unclear cost responsibilities, and inconsistent recognition of hearing loss as a disability continue to undermine these rights.

Across Europe, barriers to employment and access to reasonable accommodation for hard of hearing people are mostly institutional and cultural. Workplace accessibility is still too often understood as a matter of providing devices or individual adjustments, rather than ensuring that the workplace environment and institutional practices are inclusive by design.

This narrow focus reflects a disability-proof based model, which treats hearing loss as a personal limitation instead of recognising that barriers arise from how workplaces communicate and organise work. The findings call for a decisive shift toward a social and rights-based model that moves responsibility away from the individual and toward the system, ensuring that accessibility is built into employment policies, recruitment, and everyday communication, not left to personal negotiation.

The findings also show that awareness of the EU Guidelines on Reasonable Accommodation remains limited among both employers and civil society organizations. Where known, they are valued as a useful reference, but without binding force, the majority noted that they cannot drive real change. Turning these Guidelines into a measurable and enforceable framework would mark a crucial step towards equality.

Ultimately, true inclusion will be achieved not when accommodations are requested and granted, but when they are anticipated and guaranteed in every workplace across the EU. A rights-based approach, supported by funding, monitoring, and awareness, would ensure that access to reasonable accommodation becomes a standard of equality and participation.

5. PRACTICAL TIPS FOR INCLUSIVE EMPLOYMENT OF HARD OF HEARING PEOPLE

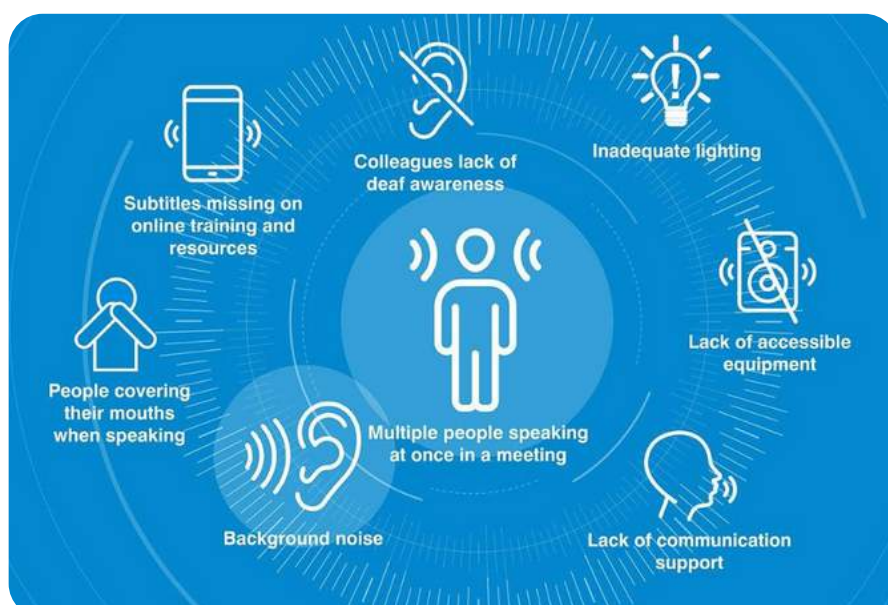
The evidence in this report shows that most barriers faced by hard of hearing people at work are not technological, they are procedural, cultural, and managerial. The following tips translate the findings into concrete actions for employers, public authorities, and social partners.

1

Mainstream communication accessibility at every stage of employment

Accessibility must be treated as standard practice, not an individual favour.

- Always offer written interview questions, email/SMS contact, captions in online meetings, and quiet rooms for interviews.
- Provide subtitles for online training and resources and make all e-learning materials accessible.
- Make sure all staff meetings, trainings, and performance reviews are accessible.



- Use microphones consistently, limit multiple people speaking at once, and avoid situations where colleagues cover their mouths when speaking.
- Ensure adequate lighting for lipreading and install visual alerts for safety.

2

Plan for fatigue, not just audibility

Hearing loss is not only “not hearing well.” It is cognitive load. Concentrating in noisy environments or trying to follow group discussions without support leads to fatigue.

- Allow flexible working hours, telework options, pacing of meetings, and breaks in long online or in-person sessions to reduce listening fatigue.
- Do not rely on rapid, multi-speaker, unstructured verbal communication as the default working style.

3

Write it down

Documented, accessible communication is a form of reasonable accommodation and benefits everyone.

- Send agendas and materials in advance.
- Summarise decisions and action points in writing (email or chat).
- After meetings, circulate captions / transcripts / chat logs whenever possible.
- For task allocation, avoid oral instructions only, written confirmation should be standard.

4

Remove unnecessary “proof” barriers

Do not make access to communication support depend on disability certification.

- Accept self-identification (“I am hard of hearing and I need captions / written follow-up / quieter space”) as enough to trigger accommodation.
- Do not require workers to prove a certain percentage of hearing loss or to obtain a formal disability status to get basic adjustments.

5

Design meetings for inclusion, including remote/hybrid formats

Hybrid and online work can reduce barriers if accessibility is built in.

- Use captioning for all online platforms; missing subtitles on digital training or webinars remains one of the most reported obstacles.
- Require cameras to be on when speaking (supports lipreading).
- Ask everyone to speak one at a time and identify themselves before speaking.
- Use chat to repeat key actions and deadlines during calls.
- Schedule breaks in meetings longer than 60–90 minutes to reduce listening fatigue.
- Share slides and instructions visually, not only verbally.

Consult organisations of hard of hearing people (at national or local level) when developing employment policies, internal guidelines, or training for managers.

- They can review recruitment procedures, workplace layouts (lighting, acoustics, alarms), and communication practices.
- They can provide hearing loss awareness sessions to colleagues, addressing one of the most common barriers reported: lack of awareness among co-workers.
- Awareness training helps prevent daily micro-barriers such as colleagues speaking too fast, turning away, or forgetting to unmute microphones in online meetings.



6. APPENDIX 1: SURVEY QUESTIONS

Survey questions
1- Are hard of hearing people (including deafened people) included in the employment policies and social protection in your country?
2- What are the requirements for a person with hearing loss to receive reasonable accommodation at work?

Survey questions

3- What reasonable accommodations are provided for the recruitment/interview process?

4- What forms of reasonable accommodations or adjustments are typically available in the workplace for people with hearing loss?

5- Are these accommodations only given to people who are officially recognized as having a disability?

6- Who typically covers the cost of these accommodations in employment?

7- What are the most common barriers people with hearing loss face in keeping or finding a job?

8- If a hard of hearing person is denied reasonable accommodation at work, how can they file a complaint or seek support?

9- Can you share examples of good practices regarding reasonable accommodations for hard of hearing people in your country?

10- Are you aware of the EU Commission's Reasonable Accommodation at Work: Guidelines and Good Practices?

11- In your opinion, the Guidance is useful for: Enhancing existing inclusive practices / Does not add to already existing policies and guidance / Other

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