

# HEARING LOSS INCLUSIVE EMPLOYMENT TOOLKIT

Practical Guidance for Employers –  
Removing Communication Barriers at Work



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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,

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## EXECUTIVE SUMMARY

EFHOH has developed this toolkit with the aim of showing how to navigate hearing loss-related challenges in employment with confidence.

Design in co-production with persons with hearing loss and based on their lived experience, we hope to close the employment gap and enable both employers and employees to develop workable strategies towards better inclusion at workplace.

It aims to strengthen understanding and implementation of reasonable accommodation in the workplace, supporting employers, policymakers, and Hard of Hearing workers in creating environments where communication barriers are removed and equality at work becomes the norm rather than the exception.

The strategies and good practices in this document touch on both no-cost and low-cost accommodations as well as organizational culture.

There are also examples of accommodations requiring professional communication support, such as captioners (speech to text interpreters) and assistive listening systems. Employers should check current support programs with their respective national bodies responsible for supporting persons with disabilities in employment.

We hope employers across Europe will embrace this toolkit as a starting point for building workplaces where every employee can communicate, contribute, and thrive.

## INTRODUCTION

**Hearing loss is one of the most prevalent, yet least visible disabilities in the workplace.**

### KEY STATISTICS

STATISTIC	VALUE	SOURCE
Europeans living with hearing loss	<b>59 million</b>	EFHOH, EHIMA, AEA - Getting the Number RIGH

### EMPLOYMENT RATE COMPERSION

STATISTIC	VALUE	SOURCE
Hard of Hearing	<b>40-44%</b>	Eurostat
General Population	<b>75%</b>	Eurostat

Even when employed, people with hearing loss may face challenges such as:

- lower wages
- higher levels of stress and listening fatigue
- retirement earlier than hearing peers.

Many of these challenges are not caused by a person’s ability but by communication barriers at work. Simple changes, such as clearer communication and captions in meetings, can make a big difference.

Providing accessible communication and reasonable accommodation is not only good practice. It is a legal obligation under the **UN Convention on the Rights of Persons with Disabilities (CRPD, Article 27)** and the **EU Employment Equality Directive (2000/78/EC)**.

## Why Hearing Inclusion Matters

Many hard of hearing employees face challenges at work. Communication barriers in the workplace can reduce confidence and increase avoidable stress. Not because of their ability, but because communication is not always accessible. Common barriers include:

**background noise**

**fast-paced discussions**

**unclear communication practices**

**lack of captions or written follow-up**

Although hearing aids and cochlear implants support communication, they do not eliminate challenges.

Because hearing loss is often invisible, exclusion frequently happens unintentionally — through inaccessible meetings, unclear communication, or environments that rely heavily on sound.

Building an accessible workplace can benefit everyone to participate, contribute, and thrive.

Hearing inclusion is not a niche issue - it is a mainstream workforce reality.

More than **1 in 5** adults is experiencing some degree of hearing loss in Europe.

Creation inclusive communication practices can:

- strengthen collaboration
- reduce misunderstandings
- Increase productivity

It also helps organisations to attract and retain skilled employees, particularly as Europe’s workforce ages and the prevalence of hearing loss increases.

Beyond the practical benefits, hearing inclusion is a legal and ethical obligation: employers must ensure equal access, provide reasonable accommodations, and remove barriers that limit participation.

Ultimately, hearing loss-inclusive practice is about dignity, equity, and organisational excellence. When communication works for everyone, workplaces become more innovative, more resilient, and more human.



Potential employers cannot look beyond your hearing devices, you are labelled as deaf and cannot hear a thing. The potential employer does not look at your talents or what you can do.

– anonymous respondent

Interviews are high pressure situations at the best of times but having to cope lip reading new people... is incredibly difficult. It made me feel awful and I used to leave the interview and cry on the way home.

– anonymous respondent



## Key Insights from Hard of Hearing Employees

Insights from the EFHOH–AEA study on Hearing Loss and Employment Survey (2025–2026):

**Communication is crucial in our working life**

**95%**

of respondents work in roles requiring constant or frequent communication, yet accessible communication environments remain the exception, not the norm.

**When Reasonable Adjustment are Provided**

**82%**

of those who received accommodations said they were effective. The gap is in awareness and proactive provision, not in the value of adjustments.

**Awareness of Support is limited**

**53%**

of respondents were not informed about possible workplace accommodations, and only 9% said they received this information from their audiologist.

**Discrimination based on hearing loss is Underreported**

**31%**

reported exclusion or discrimination at work, often without resolution or with further exclusion. Some did not report because they did not know how or where to do so.

Addressing these challenges requires not only effective hearing care interventions but also greater awareness among employers and professionals and inclusive workplace cultures that enable employees to request and receive accommodations without barriers.

## Understanding Hearing Loss

The term “**Hard of Hearing**” includes people with different levels of hearing loss — from mild to profound.

Hard of Hearing people use spoken language in their daily lives. Some may also use visual support, such as captions or lipreading, to help them understand communication.











Unlike Deaf people who use sign language as their first language, many hard of hearing people rely on a combination of hearing, speech, and visual information (e.g. captioning).

They also utilize hearing technology, including hearing aids, cochlear implants, and assistive technology such as hearing loops.

### Challenging Misconceptions Around Hearing Loss

Many people assume that the provision of hearing aids or cochlear implants “fixes” the person’s hearing. Hearing aids and cochlear implants enable people to hear however, hearing is not the same as understanding in an often challenging environment.

This is why Hard of Hearing people often require assistive technologies and reasonable accommodations.

<b>MISCONCEPTIONS</b> 	<b>FACTS</b> 
<p>If someone wears a hearing aid or cochlear implant they can hear normally. </p>	<p>Hearing aids and cochlear implants greatly enhance hearing, but do not “cure” hearing loss. </p>
<p>If someone speaks clearly, their hearing must be fine. </p>	<p>Many people with significant hearing loss communicate well using speech developed before or during hearing loss. Remember, clear speech does not equal good hearing. </p>
<p>Reasonable accommodation is expensive. </p>	<p>Most adjustments, automated captions, written communication, quieter spaces, and advance agendas, cost little or nothing to implement. </p>
<p>Hearing loss only affects older workers. </p>	<p>Hearing loss can occur at any age. Around 1.1 billion young people worldwide are at risk due to unsafe listening practices </p>

Source: (WHO World Report on Hearing)

## **EFHOH Hearing Inclusion Framework: Four Pillars for an Accessible Workplace**

### **1. Awareness & Culture**

Organisations build inclusion by recognising that hearing loss is common, often invisible, and shaped by communication environments. A culture of openness, respect, and proactive support reduces stigma and empowers employees to ask for what they need.

### **2. Accessible Communication**

Clear, multimodal communication is the foundation of participation. This includes visual support, captioning, accessible meeting practices, and tools that ensure information is delivered in more than one sensory channel.

### 3. Inclusive Technology & Tools

Assistive listening systems, captioning solutions, hearing-friendly meeting platforms, and personal devices enable equal access to information. Technology must be available, maintained, and easy to use across in-person, hybrid, and remote settings.

### 4. Supportive Work Environments

Physical and digital environments should minimise barriers — from acoustics and lighting to hybrid meeting setups and workstation design. Small adjustments create significant improvements in comfort, comprehension, and participation.

## Act Before Diagnosis

The most common reason employers delay accessibility is the belief that formal medical certification is required before any action is needed.

In some cases, employers may only recognise or provide support when medical certification has been issued within the same national system. The evidence shows this approach fails most hard of hearing employees.



- Formal audiometric test in a soundproof booth
- Measured hearing loss must exceed a clinical threshold for disability certification
- Official disability registration or certification obtained
- Employer then considers reasonable accommodation



- Focus on the communication barriers in the specific workplace
- Ask the employee: what is making participation difficult?
- Identify and remove the barrier — regardless of formal disability status
- Treat accessibility as a shared responsibility, not an individual burden

The Social Model approach supports more employees and does not cost more. It is also consistent with the European Commission's 2024 guidance, which recommends that accommodations should be based on individual needs, not formal certification.

## Practical Tips for Employers

### Appoint an accessibility focal point.

Assign a named contact within HR to coordinate accessibility across teams and act as the first point of contact for employees requesting support.

### Do not wait for medical certification.

Do not delay accessible communication practices while waiting for a medical certificate. Ask employees what barriers they face and act accordingly.

### Recognise the cost of inaction.

Lost productivity, higher absence, and talent loss often cost organisations more than simple adjustments.

### Remember that accessibility benefits everyone.

Accessible communication improves productivity, collaboration, and retention across the workforce.

## Workplace Adjustments and Reasonable Accommodation

Reasonable accommodation means providing the necessary and appropriate adjustments that enable persons with disabilities to work on an equal basis with others.

### What Employers Need to Know

The EFHOH–AEA study found that **82% of respondents who received accommodations reported they were effective**, yet **53% had not been informed about available support**, highlighting that the key barrier is awareness and proactive provision.

Important to remember: accommodations are **not** privileges, they are legal rights and essential to equal participation, and experiences from hard of hearing employees show how important these adjustments are in practice to reach full potential.

For hard of hearing people, reasonable accommodation typically involves ensuring communication access and creating hearing loss-friendly environments. The most common accommodations include:

### Assistive listening systems

Induction loops, FM, or IR systems in meeting rooms, training areas, conference halls, and reception desks.



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### Personal Assistive listening devices



### Written communication

Use email, chat, shared documents for key decisions, instructions and follow-up instead of phone-only communication.



### Optimized environments

Quiet environments, good room acoustics and good lighting to support lipreading.



### Flexible working arrangements

Including remote work options and quiet focus time.



### Communication awareness training

Educating colleagues and managers **on best practices for inclusive communication.**



### Real-time captioning

Human or automatic captions for meetings and training sessions using platforms like Teams, Zoom, or Google Meet.

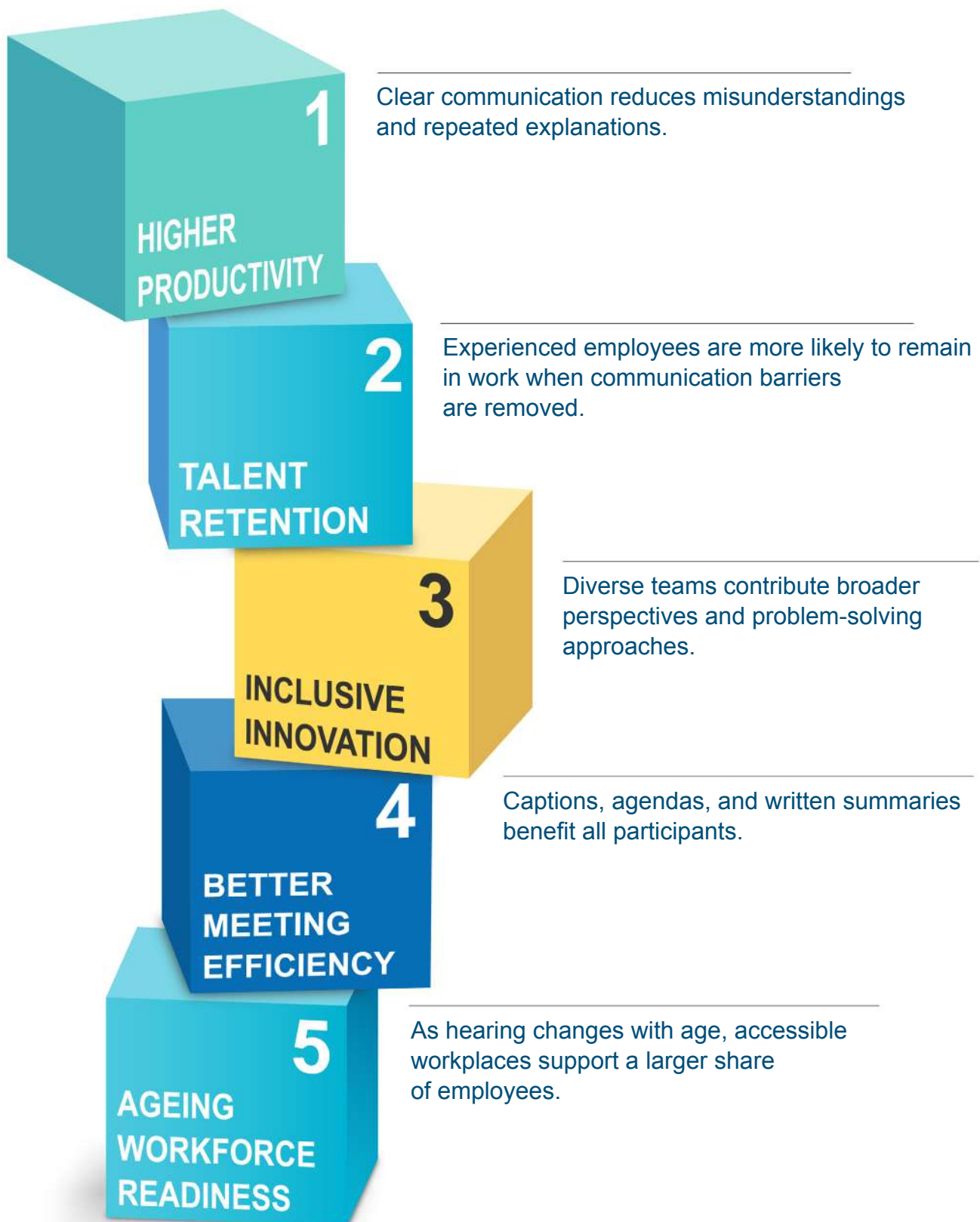


### Job coaching or HR support

Personalized guidance where appropriate.



## ACCESSIBLE WORKPLACES BENEFIT EVERYONE!



Accessible workplaces are therefore not only a matter of compliance, but also a **practical investment in organisational performance.**

## Quick Start Guide for Employers

Not sure where to begin? These five actions will make an immediate difference.



### 1. Quick Start Guide for Employers

At recruitment and onboarding, ask all employees about their communication needs. Make it straightforward to request adjustments. Provide, where requested, real-time captioning (specialist service).



### 2. Enable Captions by default

Activate automatic captions in Microsoft Teams, Zoom, or Google Meet for every meeting.



### 3. Share Agendas in Advance

Send meeting agendas and key documents to participants at least 24 hours before meetings.



### 4. Use Written Communication

Follow up verbal instructions, decisions, and action points in writing — by email, chat, or shared documents.



### 5. Reduce Background Noise

Choose quiet meeting spaces and competing audio sources during video calls and in open office areas.

## The Hearing Inclusive Workplace Model — 8 Core Areas

These ten areas together create a workplace where communication is accessible, adjustments are in place, and every employee can contribute fully.



## Roles & Responsibilities

Hearing inclusion only works when accountability is clear. The table below sets out each element of the employer's duty. Every organisation should be able to name a person against each row.

HR & PEOPLE TEAM	LINE MANAGER	IT & FACILITIES
<ul style="list-style-type: none"> <li>• Integrate accessibility into recruitment, onboarding, and HR policies.</li> <li>• Coordinate accommodation processes and documentation.</li> <li>• Maintain budget for accessibility tools and services.</li> <li>• Provide training on hearing inclusion and accessible communication.</li> <li>• Ensure confidential reporting mechanisms for accessibility barriers.</li> </ul>	<ul style="list-style-type: none"> <li>• Apply accessible communication practices within teams.</li> <li>• Support employees requesting adjustments.</li> <li>• Monitor listening fatigue and workload impact.</li> <li>• Ensure team meetings and training are accessible.</li> <li>• Support return-to-work planning after hearing loss.</li> </ul>	<ul style="list-style-type: none"> <li>• Ensure communication platforms support captions and accessibility features.</li> <li>• Install and maintain assistive listening systems.</li> <li>• Maintain visual alarms and emergency alerts.</li> <li>• Procure accessible digital tools and workplace equipment.</li> <li>• Manage booking systems for accessibility services.</li> </ul>



## Inclusive Recruitment

The recruitment process is often the first barrier for hard of hearing applicants. Asking candidates about their needs at the start of the process, rather than waiting to be asked, demonstrates proactive inclusion.

### Accessible Job Postings

- Avoid requirements such as “must be comfortable with phone calls” unless strictly necessary for the role.
- Clearly state that reasonable accommodations are available during the recruitment process.
- Provide multiple contact options (email, online forms, texting).

### Accessible Interviews

- Offer captioning or speech-to-text support for interviews by default.
- Share interview format, participants, and questions in advance.
- Ensure interview rooms have good lighting and minimal background noise.
- If using video conferencing, ensure the platform supports live captioning and that all participants are visible on screen.
- Allow extra time for responses and use visual aids to reinforce spoken information.

### Proactive Approach

- Do not require candidates to disclose hearing loss to access adjustments.
- Make the availability of accommodations visible and easy to request.
- Invite feedback on the accessibility of the interview process to improve future practice.



#### Good Practice

Accessible recruitment is a marker of your workplace culture. When every applicant can communicate and participate equally, you strengthen inclusion, trust, and talent diversity from the very start.

# 02



## Accessible onboarding



### What Employers Need to Know

The first days and weeks in a new role are critical for any employee. For hard of hearing workers, onboarding that assumes everyone hears equally can create immediate barriers — missed information in induction sessions, unfamiliar team communication norms, and technology that is not yet set up for their needs. Proactive onboarding builds confidence, belonging, and effectiveness from the start.

### Adjustments Ready on Day One

Confirm the employee's communication preferences before they start. Ensure captioning tools are enabled, equipment tested, and relevant colleagues briefed in advance.

### Discuss Support Openly

Schedule a dedicated onboarding meeting with HR or a manager to cover available adjustments, team communication norms, and how to request additional support without stigma.

### Accessible Materials

Provide all induction materials in accessible formats: captioned videos, written instructions, and digital documents rather than audio-only content.

### Buddy System & Follow-Up Check-Ins

Assign a buddy who understands hearing accessibility. Check in after the first month to confirm adjustments are working effectively and address any new needs.

# 03



## Everyday Communication at Work



### What Employers Need to Know

Communication is central to most professional roles. Data from the EFHOH-AEA study indicate that spoken interaction is the most common form of workplace communication, while difficulties are most frequently reported in situations involving background noise, multiple speakers, or fast-paced discussions. Accessible everyday communication reduces barriers, improves performance, and supports well-being for all employees.

### Accessible Meetings (In-Person, Remote, and Hybrid)

Essential for people with hearing loss, useful for many.

The guide below shows simple and achievable adjustments that help to create more inclusive team or training meetings.

## 01

### BEFORE THE MEETING

- Book captioning or speech-to-text services well in advance
- Send agenda, slides, and key documents at least 24 hours ahead
- Assign a meeting moderator to manage turn-taking and monitor chat
- Choose rooms with good acoustics, lighting, and minimal background noise

- Speak one at a time - avoid overlapping speech at all times
- Keep mouths visible; face the camera or the speaker during discussion
- Enable automatic captions (Teams / Zoom / Google Meet) as standard
- Allow extra response time and take short breaks

### DURING THE MEETING

## 02

## 03

### AFTER THE MEETING

- Share written transcript or summary within 24 hours of the meeting
- Confirm all decisions and action points in writing - email or shared documents
- Offer follow-up questions by email for any missed or unclear points
- Invite feedback on accessibility to improve future meeting practice



## Managing Listening Fatigue – EMPLOYER ACTIONS



### What Employers Need to Know

For people with hearing loss, listening is not passive.

Concentrating on speech, filling in missed words, lipreading, managing hearing aids, and tracking multiple speakers requires significant additional cognitive effort beyond what hearing colleagues experience.

Over a full working day, this creates a form of fatigue distinct from general tiredness:

- reduced concentration
- lower performance
- increased stress.

### FIVE EMPLOYER ACTIONS THAT MAKE A MEASURABLE DIFFERENCE

#### 1 Enable Captions for online meetings as Standard\*

Activate captioning by default in all online meetings and training sessions. Captions reduce listening effort and improve participation for everyone.

#### 2 Structure Meeting Time

Avoid scheduling long consecutive meetings or last-minute verbal briefings. Rotate meeting-heavy days and build in at least 15-minute recovery gaps between sessions.

#### 3 Offer Camera-Off Recovery Breaks

Extended video calls require sustained lipreading and visual attention. Allow camera-off periods during longer meetings or training sessions to reduce fatigue.

#### 4 Provide Quiet Workspaces

Reduce background noise where possible and ensure access to quiet spaces for focused work, particularly on communication-heavy days.

#### 5 Offer Wellbeing and Peer Support

Listening fatigue can affect confidence and wellbeing. Ensure employees have access to counseling, peer networks, and regular check-ins that address communication needs.

*\* Check with the employee if the automated captions meet their expectations. Offer professional service where possible.*



## Digital Accessibility

As workplaces are becoming increasingly digital, accessible meetings are not enough. The intranet, shared documents, e-learning, and daily digital tools must also be accessible to ensure all employees can participate fully.

### Accessible Platforms & Tools

- Use platforms with built-in accessibility features like Teams, Zoom, Google Meet.
- Avoid audio-only communication for important information.
- Ensure internal systems and platforms support captions, transcripts and clear visual information, with readable fonts, appropriate size, good contrast, and accessible color schemes.
- Ensure available captions are accurate, synchronised, readable and easy to follow.
- Test new software for accessibility before deployment and involve users with hearing loss in testing.

### Accessible Documents & Content

- Use structured documents with headings, lists, and logical reading order.
- Apply high-contrast colour schemes and avoid conveying meaning through colour alone.
- Provide captions or transcripts for audio and video content.

### Accessible E-Learning & Training

- Caption training videos and ensure captions are accurate.
- Provide transcripts for audio or video content used in training.
- Ensure e-learning platforms support keyboard navigation and assistive technologies.
- Share training materials in advance where possible.

*Procurement standard: include digital accessibility requirements in all software procurement and renewal processes. Require vendors to demonstrate WCAG 2.1 AA compliance.*



## Safety At Work and Emergency Communication

### Why This Matters

Workplace safety must include everyone.

For hard of hearing employees, alarms and emergency instructions that rely only on sound can be dangerous. Adding visual and tactile alerts ensures everyone can respond quickly.

Making emergency communication accessible is a safety requirement and part of equal access to the workplace.

### Accessible Alarm & Alert Systems

According to EN 17210, buildings with audible alarms should also provide visual alarm systems following the **multiple-senses principle**.

- Install visible flashing beacons or light strobes across work areas, corridors, and restrooms.
- Provide vibrating or flashing alarm devices connected to fire alarm systems where appropriate.
- Use visual displays or text alerts for emergency messages and public announcements.
- Test alarm systems regularly to ensure they are visible and functioning in all areas.

### Accessible Emergency Procedures

Emergency procedures must be accessible to all employees and clearly communicated.

- Provide evacuation procedures in written and visual formats.
- Include captioned briefings or written handouts in safety training.
- Use text-based communication channels when coordinating emergencies.
- Designate trained safety focal points for accessible communication.
- Conduct inclusive safety drills that ensure employees using hearing technologies or captioning tools can participate fully.



## Keeping Accessibility Alive – Tools, Budget & Booking

The most common failure mode in workplace accessibility is not the initial setup — it is the breakdown six months later. Hearing loops go untested. Captioning contracts lapse. Nobody knows how to book a captioning service. Adjustments should not be a one-off action. They require ongoing review. This simple page sets out what prevents that.

### REGULAR TESTING & MAINTENANCE

#### Equipment Checks

Test hearing loops, FM systems, and assistive listening devices at least quarterly and before major meetings or events.

#### Software & Platform Updates

After significant updates to video conferencing platforms, verify that captioning features remain enabled and functional. Include caption testing in standard IT deployment checks.

#### Accommodation Plan Review

Review individual accommodation plans regularly and whenever roles, teams, or technologies change to ensure adjustments remain effective.

### BUDGET & RESOURCING

#### Accessibility Budget

Maintain a budget line for assistive technology, captioning and speech-to-text services, hearing loop installation or maintenance.

#### Awareness of Public Funding

In many EU countries, employers may access public funding or subsidies for workplace accessibility. HR teams should be aware of available schemes and include them in accommodation planning.

#### Procurement Standards

Include hearing accessibility requirements (such as captioning capability, hearing loops, and acoustic standards) in procurement contracts for buildings, equipment, and software.

## BOOKING PROCESS FOR ACCESS SERVICES

### Clear Booking Process

Establish a simple and documented process for booking captioning services (CART), hearing loop setup, or other access services.

### Advance Notice

Captioning providers typically require 48–72 hours' notice. Build this requirement into meeting and event planning procedures.

### Accessibility Contact

Assign an accessibility focal point responsible for service provider lists, booking procedures, and support for organisers. Provide a confidential feedback or complaint mechanism for reporting accessibility barriers.

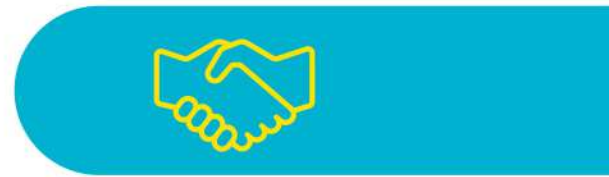
## Practical Tool: Self-Assessment Checklist

Ready to take action?

A separate Hearing Loss Inclusive Workplace Checklist is available to help you assess your current practices and identify areas for improvement.

Scan the QR code below to access the checklist and get started.





## Returning to Work After Hearing Loss

Many people develop hearing loss during their working life. Returning to work or starting a new job after diagnosis, hearing device fitting, or cochlear implantation can be a challenging transition — physically, emotionally, and professionally.

EFHOH research shows that only 45% of late-deafened people kept their jobs after losing their hearing, and 60% reported anxiety or depression.

A supportive return-to-work process is essential to enable employees to regain confidence and continue contributing.

### 1 EARLY COMMUNICATION & PLANNING

#### **Inform Employee of Rights**

Explain available accommodations, how they can be requested, and who the accessibility contact person is. Provide this information proactively.

#### **Open Confidential Dialogue**

Arrange a private meeting between the employee, manager, and HR to discuss communication challenges and needs before any return date is set.

#### **Return-to-Work Planning**

Agree on short- and long-term adjustments before the employee resumes duties. Involve occupational health where available.

### 2 FLEXIBLE WORKING RETURN ARRANGEMENTS

#### **Gradual Return Schedule**

Allow phased return if medical or rehabilitation appointments are ongoing. Reduce meeting load and adjust workload expectations during the adaptation phase.

#### **Remote & Flexible Options**

Flexible hours or remote work can support adjustment to the new use of hearing technologies .

### 3 WELLBEING SUPPORT & FOLLOW-UP

#### Recognise the Emotional Impact on Wellbeing

Acquired hearing loss can affect confidence and wellbeing. Offer access to counselling or peer support where possible.

#### Scheduled Follow-Up Reviews

Review adjustments after approximately 2 weeks, 6 weeks, and 3 months to confirm they remain effective.

#### Team Awareness

With the employee's consent, inform the immediate team about accessible communication practices to reduce the need for constant self-advocacy.

### Building an Accessible Workplace Culture

- 1



**Integrate Hearing Awareness into Training**

Include hearing accessibility in staff induction, HR processes, and management training so that managers understand listening fatigue, communication needs,
- 2



**Provide Practical Awareness Sessions**

Run short team sessions explaining how hearing loss affects everyday work communication and how colleagues can support accessible interaction.
- 3



**Regular Well-Being Check-Ins**

Managers should discuss workload, communication barriers, and listening effort during regular one-to-one meetings. The goal is to catch the accumulation of small barriers before they become significant ones.
- 4



**Supporting Safe Disclosure**

Employees should feel safe disclosing hearing loss and requesting accommodations without fear of negative impact on career progression.
- 5



**Consult Hard of Hearing Organisations- Align with Lived Experience**

Work with hard of hearing employee groups or organisations such as EFHOH member organisations to ensure workplace policies reflect lived experience.

# 09



## Employer Case Examples – Hearing Inclusion in Practice

The following examples illustrate how hearing inclusion works in practice across different workplace contexts and show how small adjustments can remove communication barriers and improve workplace participation. Use this model to identify where you are and what will move you to the next stage.

	Case 01 - Regional Government Office	Case 02 - Technology Company	Case 03 — Manufacturing Company
CHALLENGE	A hard of hearing employee was missing key information during all-staff meetings — affecting participation, confidence, and follow-through on team actions.	A candidate with hearing loss struggled with a phone-based screening interview — effectively excluding a qualified candidate before they could demonstrate their skills.	An experienced production supervisor developed sudden hearing loss following illness. Traditional safety systems and communication methods were no longer accessible to them.
ACTION TAKEN	Automatic captions enabled in video meetings. A meeting moderator introduced to manage turn-taking. Written summaries shared within 24 hours as standard practice.	Phone screening replaced with captioned video interviews and a written alternative. All interview communication moved to email with clear accessibility information included.	Workplace assessment conducted. Assistive listening system installed. Vibrating safety alerts provided. Phased 6-week return-to-work plan introduced with team awareness training.

**OUTCOME**

The employee reported improved participation and confidence. Colleagues also found written summaries improved clarity and follow-through for the entire team.

The candidate was successfully hired. The inclusive recruitment approach was adopted as standard practice for all future applicants.

The employee returned successfully to full duties. The team awareness session improved inclusive communication practices across the wider workforce.

## Practical Tool: Self-Assessment Checklist

Ready to take action?

A separate Hearing Loss Inclusive Workplace Checklist is available to help you assess your current practices and identify areas for improvement.

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# Hearing Inclusive Workplace Maturity Model

Where does your workplace stand on hearing accessibility? What is the next step?

Hearing inclusion is not a one-time adjustment, but a continuous process of improving communication, removing barriers, and embedding accessibility into everyday practice.

This model helps you identify your current level of maturity and understand how to move forward, from initial awareness to a fully inclusive workplace where accessibility is built into systems, culture, and decision-making.

Use the maturity model below as a practical tool to reflect, prioritise actions, and track progress over time. Focus on priority areas, identify the steps needed to progress, and review progress regularly to ensure that accessibility is applied consistently in practice.

## STAGE 1 AWARENESS

Hearing loss is recognised, but no systematic action has been taken. Adjustments are made informally, if at all. Awareness of legal duties is limited.

- Ad hoc adjustments only
- No formal policy in place
- Limited manager awareness of hearing loss

## STAGE 2 DEVELOPING

The organisation has begun to address hearing inclusion. Some policies are in place. Adjustments are available but not consistently applied. Training is beginning.

- Some policies drafted
- Basic adjustments available on request
- Manager training starting

## STAGE 3 INCLUSIVE

Hearing inclusion is embedded across recruitment, communication, and the work environment. Adjustments are provided proactively. A clear accommodation process exists.

- Proactive accommodation
- Trained managers and HR
- Clear documented request process

*Most organisations will be at different stages across different areas. Use the Checklist at the end of this toolkit to identify your priorities.*

## Final Word

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Workplace accessibility is often treated as something to address later, or only when requested. This approach leaves too many barriers in place and places the burden on individuals to adapt.

This means making accessibility part of everyday decisions: how meetings are run, how information is shared, how teams communicate, and how workplaces are designed. It also means ensuring that responsibility is clear, processes are in place, and progress is monitored over time.

Accessible communication, flexibility, and clear processes not only support hard of hearing employees. They improve efficiency, increase productivity, and strengthen collaboration and trust across the entire working team.

A truly inclusive workplace is one where accessibility is built in, barriers are removed, and everyone can thrive.

Please use the separate checklist to support you in the journey towards creating a more inclusive workplace for hard of hearing employees.

## ANNEX I: Legal Frameworks

Across the EU and internationally, multiple frameworks establish the right of persons with disabilities, including hard of hearing people, to work on an equal basis with others. Employers have both a **legal and ethical duty** to ensure accessibility, prevent discrimination, and provide reasonable accommodation in the workplace.

Key frameworks defining these obligations are:

- **The UN Convention on the Rights of Persons with Disabilities (CRPD)**, ratified by the EU and all Member States, explicitly protects the right to work and employment under **Article 27**.
- **Article 9 (CRPD) – Accessibility**: requires States to ensure access to information, communication, and physical environments in all aspects of work life.
- **Article 27 (CRPD) – Work and Employment**: States must prohibit discrimination on the basis of disability and ensure that reasonable accommodation is provided in the workplace.
- **The EU Employment Equality Directive (2000/78/EC)** establishes a **general framework for equal treatment in employment and occupation**, prohibiting direct and indirect discrimination on the grounds of disability.
- **The European Commission’s Guidelines on Reasonable Accommodation at Work (2024)** provide practical, non-binding guidance to help employers and Member States implement the Employment Equality Directive more effectively.
- **The European Pillar of Social Rights (Principles 4 and 5)** reinforces that everyone has the right to **equal treatment and opportunities** regardless of disability and to **fair and safe working conditions** that respect health, safety, and dignity at work.
- **The European Accessibility Act (Directive 2019/882)** complements employment rights by requiring accessibility in key products and services, including digital communication tools, computers, and online services, essential for equal participation in modern workplace.
- **The ITU Guidelines for Supporting Remote Participation in Meetings for All (2021)** set international standards for accessible communication and participation in online and hybrid meetings with practical measures such as providing real-time captioning, ensuring clear audio quality, using visible speakers, and offering multiple channels for interaction (text, video, or speech).
- **The European Standard EN 17210:2021 – Accessibility and Usability of the Built Environment** defines the functional requirements and recommendations for accessible environments, including provisions on acoustics, assistive listening systems, and visual alarms essential for hard of hearing people.
- **The International Labour Organization (ILO) Convention No. 159 on Vocational Rehabilitation and Employment (1983)** requires Member States to develop national policies on **vocational rehabilitation, training, and employment** of persons with disabilities, ensuring their integration into open labour markets.

## ANNEX II: Accessible Office Environment – Design & Standards

An accessible work environment goes beyond policy. **The European standard EN 17210:2021 — Accessibility and Usability of the Built Environment** sets functional requirements and recommendations for accessible and usable environments, based on Universal Design principles. It serves as the key European reference for accessibility in all publicly funded or procured buildings. For hard of hearing people, it includes specific guidance on assistive listening systems, acoustics, lighting, and visual alerts.

### Assistive Listening Systems

Install induction loops (hearing loops), FM, or IR systems in meeting rooms, conference halls, training areas, and reception desks. Induction loops deliver sound directly to hearing aids via telecoil (T-coil) and should follow IEC 60118-4 installation standard.

**Standard: IEC 60118-4 | Display international hearing loop symbol wherever systems are available.**

### Acoustic Design

Spaces should achieve a high Speech Transmission Index (STI) and minimise reverberation to support speech clarity. Apply sound-absorbing materials (ceiling panels, carpeting, soft furnishings) in meeting rooms and common areas. Poor acoustics amplify background noise and make hearing aids significantly less effective.

**Target: STI  $\geq$  0.60 for meeting rooms | Limit reverberation to  $\leq$  0.6s**

### Lighting for Visual Communication

Bright, balanced, and even lighting is essential for lipreading and visual communication. In meeting rooms and reception areas, light should be directed toward speakers' faces. Avoid strong backlighting (windows behind speakers) and ensure all areas have consistent lighting without harsh shadows.

**Avoid backlighting | Minimum 300 lux at face height in meeting areas**

### Visual Alarms & Procurement

Install visible flashing beacons throughout all work areas, corridors, and restrooms following the EN 17210 multiple-sense principle. Include hearing accessibility requirements (loops, acoustics, lighting standards, visual alarms) in all facility procurement, renovation, and new-build specifications.

**EN 17210 multiple-sense principle | Embed in all procurement specifications**

Existing buildings should be assessed against EN 17210 requirements during any refurbishment or fit-out. For new builds, accessibility must be built into the design brief from the outset — retrofitting is significantly more costly.

Together, these frameworks define employment as both a human right and a condition for social inclusion. They require not only non-discrimination, but proactive measures to ensure that the work environment, communication systems, and technology are accessible to hard of hearing people, enabling them to contribute on an equal basis with others.



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