



Best practice for inclusive employment

(CUBUFO)

Title of the best practice

The Irish Financial Sector Model: Implementing the Disability Smart Standard through a Comprehensive Neuroinclusion and Reasonable Accommodations Framework

I. Strategic Foundation and Corporate Context

1. Company context (size, sector, locations, diversity governance, partner network)

The analyzed best practice originates from Bank of Ireland (BoI), a leading financial institution operating in both the Republic of Ireland and the United Kingdom. As a large multinational corporation (MNC) in the financial sector, the organization operates in a highly regulated environment where compliance with equality and inclusion requirements is both a legal obligation and a strategic imperative for maintaining competitiveness and reputation. The Inclusion and Diversity (I&D) strategy is centrally embedded in the Group's corporate purpose: "Helping you thrive".

Diversity governance at BoI is structured and supported from the bottom up through seven active Employee Support Networks, which are vital for achieving strategic goals. For the purposes of inclusive employment, two of these networks have direct responsibility: the **Accessibility Network**, which focuses on accessibility and the inclusion of people with disabilities, and the **Neuroinclusion Network**, which aims to support neurodivergent colleagues and assist in the formation of neurodiverse teams. These networks not only support colleagues but also act as internal advisory bodies informing policy development.

A key aspect of the model is the strong emphasis on external validation and strategic partnership. In 2021, BoI became the first Irish company to receive the **Disability Smart Standard (DSS)** accreditation from the Business Disability Forum (BDF), achieving "Bronze" status. This accreditation serves as an external, structured framework for continuous improvement, transforming I&D initiatives from voluntary efforts into an auditable, business-critical process evaluated across ten key areas.



In addition to its commitment to the BDF, the institution maintains specialized partnerships. Collaboration with the **NCBI (National Council for the Blind of Ireland)** is critical for user testing of digital accessibility, particularly mobile banking. Furthermore, the strategic partnership with organizations like **Auticon** supports the development of targeted neuroinclusion tools and policies, indicating program maturity that goes beyond general accessibility measures to focus on specific talents.

2. Problem and motivation (business and people; database/signals indicating a need for change)

The motivation for implementing a comprehensive inclusive employment framework is two-fold – focusing on both humanitarian and business arguments. At the people level, the primary goal is to create a culture based on respect, dignity, and equity, where every employee can "thrive".

The most critical operational signal necessitating structural change is the so-called **Disclosure Gap**. Industry research (e.g., Heidrick and Struggles) indicates that while approximately 30% of employees may have a disability (hidden or visible), only about 10% disclose it to their employer. This means that a significant portion of the workforce (around 20%) spends "valuable resources and energy" concealing their condition. This energy, which could be directed toward work and innovation, is instead spent managing stigma and the fear of being perceived as "less capable".

Bridging this disclosure gap is a direct ROI motivator. When employees feel safe being themselves, their engagement and productivity increase. From a business perspective, the organization recognizes that attracting people with different skills, backgrounds, and abilities makes the company stronger and more successful. Furthermore, AHEAD research in Ireland shows that 75% of employers view hiring people with disabilities as an important contribution to **business innovation**.

The strategic advantage underlying this model is the recognition of inherent leadership qualities often found in people with disabilities: **resilience, adaptability, and innovation**. These qualities are developed through the necessity of navigating a world not designed for them. Consequently, the inclusion of people with disabilities is positioned not as charity or minimal compliance, but as a strategic search for talent that brings a competitive edge. Tools such as the Inclusion Passport and the Neuroinclusion Policy are a direct operational response aimed at eliminating the fear of stigma and unlocking the full potential of this "hidden" workforce.



II. Governance, Policy, and Compliance

3. Governance & ownership (executive sponsor, ERG/committee, roles and responsibilities)

Inclusive employment governance is integrated at all levels of the organization. The I&D strategy is sponsored at the executive level, ensuring it receives the necessary resources and strategic prioritization. Senior management actively supports internal Employee Resource Groups (ERGs), which serve as the primary engine for the Group's I&D strategy.

The **Accessibility Network** and the **Neuroinclusion Network** are the primary internal process owners. These networks not only support colleagues but also participate in the development of specific guidelines, such as the Neuroinclusion Policy.

Key roles and mechanisms ensuring operational ownership include:

1. **HR and People Managers:** They are responsible for the daily implementation of accommodation policies and the use of the **Reasonable Adjustments Passport**. Their training and competence, supported by specialized toolkits, are crucial to the success of inclusion.
2. **Recruiters:** These specialists must undergo Inclusive Hiring training, ensuring the entry process into the company is fair and accessible.
3. **External Governance (DSS):** The Business Disability Forum (BDF) framework imposes external ownership and accountability across ten key areas. This framework ensures that the commitment is maintained across all business units, not just within HR.

The **Inclusion Passport** tool plays a pivotal role in governance as it institutionalizes support. By documenting agreed adjustments, it ensures consistency and removes the need for repeated disclosure when a manager or role changes, shifting the responsibility for maintaining adjustments onto the organization.

4. Compliance & policy (anti-discrimination, GDPR, H&S; how they are applied)

The organizational compliance framework is built on rigorous anti-discrimination policies that exceed minimal regulatory requirements. The Group's Code of Conduct explicitly states that no form of discrimination based on protected characteristics, including **disability**, will be tolerated. Any allegations of discrimination, harassment, or intimidation are treated as serious matters and addressed promptly and confidentially.

Operationalization of Anti-discrimination through Policies:

The legal obligation to provide reasonable accommodations is operationally applied through the introduction of the **Reasonable Adjustments Passport and Guide**. This tool is the



primary mechanism for fulfilling the Equality Act, providing a clear and easy-to-follow process.

The institution has also developed specialized policies aimed at specific demographic groups, such as the **Neuroinclusion Policy**. This policy provides guidance for managers and employees, ensuring that support for neurodiverse talent is precise and effective, demonstrating legal and operational precision beyond general frameworks.

GDPR Compliance and Confidentiality:

Extreme attention is paid to data security and confidentiality in the application of the Reasonable Accommodations Passport and the Neuroinclusion Policy. These tools serve as mechanisms for the controlled and voluntary sharing of sensitive personal data (such as Self-ID of health conditions). The Passport ensures that:

1. Data is used strictly for the purpose of providing support.
2. Information sharing is controlled by the employee and limited only to the direct manager and HR.

By documenting agreed adjustments and ensuring their portability, the organization demonstrates **proactive and continuous compliance** with its obligations under the Equality Act, reducing the risk of legal disputes related to the refusal or delay of support.

III. Operational Implementation and Practical Approach

5. Practical approach (what was changed: processes, roles, technologies; timeline; affected employees)

The practical approach focuses on institutionalizing inclusion through the introduction of specific tools and process changes.

Changes in Processes and Roles:

The most significant process change is the introduction of the **Inclusion/RA Passport**. This tool standardizes the request, approval, and documentation of workplace adjustments. It removes the administrative burden from the employee of repeating their needs with every change in manager or position.

Role changes are primarily related to increasing competence:

- All recruiters are required to undergo inclusive hiring training.
- People Managers receive a specialized **Neuroinclusion Toolkit** and guidance on applying the neuroinclusion policy. This decentralizes responsibility for inclusion from



central HR to the line of management, accelerating the implementation of adaptations.

Technological Changes and Timeline:

The organization is committed to continuously improving digital accessibility, targeting technological changes toward compliance with the **Web Content Accessibility Guidelines (WCAG) version 2.2 AA**.

Key moments in the timeline include:

- **2021:** Achieving Bronze Disability Smart Standard (DSS) accreditation.
- **Post-2021:** Active focus on internal tools (Inclusion Passport) and specialized areas such as neuroinclusion (Neuroinclusion Policy, Charter, Toolkit), often in partnership with external experts.

These changes affect the entire organization: all employees (through the new Code of Conduct and I&D training), as well as all managers, recruiters, and, of course, colleagues who use the Passport for adjustment.

6. Reasonable accommodations process (how it is requested, who approves, timelines/SLA, budget)

The reasonable accommodations (RA) process is standardized to ensure speed, fairness, and confidentiality.

Requesting Accommodations:

1. **Candidates:** For job candidates requiring support for the application or interview process due to disability, neurodivergence, or a medical condition, a **specialized online form** is available.
2. **Employees:** For current employees, the request process is managed through the **Inclusion Passport**. This process begins with a confidential conversation between the employee and their People Manager. The employee shares their needs, preferences, and preferred working styles, which are then formalized in the Passport.

Approval and Ownership:

The approval of most standard operational adjustments is performed by the **People Manager** in consultation with HR. For large or complex adjustments, the process may require review by specialized units (IT for technological needs, Facilities Management for physical changes) or the internal Disability Liaison Officer (DLO).



Typical examples of adjustments include: changes to the work environment (lighting, sound, important for neurodivergence), assistive technologies, communication support (interpreters), and structural support (shift flexibility or changes to the format of meetings/interviews).

Timelines (SLA) and Budget:

While specific internal SLA and budget data are not publicly available, the need for prompt reaction is critical for employee retention. Industry standards and analysis of related cases indicate that for the RA Passport process to be effective, it must operate with high speed. For standard, low-budget adjustments, the target Turnaround Time (TAT) should be within **10 to 15 working days**.

Budgetary provision for reasonable accommodations is usually classified as an operational expense, centralized for significant investments (e.g., expensive assistive technologies or physical changes) and decentralized for daily needs. The success of the Passport ensures that costs are managed effectively, avoiding duplicative costs and delays that would otherwise lead to higher turnover costs and lower productivity.

IV. Accessibility Analysis

7. Accessibility

Accessibility is analyzed across four main dimensions, with the organization demonstrating a comprehensive approach encompassing the physical, digital, and organizational environment, as well as support through training and technology.

Physical (offices, evacuation, workplaces)

Physical accessibility is a mandatory requirement for a large organization with a branch network. All branches offer basic accessibility measures, including wheelchair access and compliance with DDA (Disability Discrimination Act) standards.

Key elements of physical accessibility include:

- **Branch Accessibility:** Providing ramps and accessible facilities, which was highly rated in the Disability Smart Standard audit under the "Premises" area.
- **On-site Assistive Technologies:** Availability of induction loops (hearing loops) in all branches, which improves sound quality for hearing aid users during customer service and internal meetings.

Investments in physical accessibility serve the needs of both customers and employees, representing a **strategic dual investment** that enhances both the user experience and workplace attractiveness.



Digital (apps, intranet, WCAG/EN 301 549, testing)

The commitment to digital accessibility is high, as financial services increasingly rely on online and mobile platforms. The organization aims for compliance with **Web Content Accessibility Guidelines (WCAG) version 2.2 AA** for its website and mobile apps. Choosing WCAG 2.2 AA shows proactivity, given that this exceeds the minimum requirements of older standards and anticipates future regulatory requirements (e.g., the European Accessibility Act).

Testing and Validation: The organization uses external validation. Collaboration with the **NCBI (National Council for the Blind of Ireland)** is critical, with user testing of mobile banking performed to ensure the app is easily accessible for customers and employees with visual impairments. All internal tools and policies (such as the Neuroinclusion Policy and Inclusion Passport) are also available online.

Organizational/process (rules, shifts/flexibility, meeting norms)

Organizational accessibility is achieved through flexibility and the modification of standard working norms, especially regarding neurodiversity.

- **Flexibility and Hybrid Model:** Support for a hybrid working model is a primary organizational adjustment.
- **Inclusion Passport:** This tool institutionalizes flexibility, allowing employees to define their work preferences and include "Structure Supports", such as changes in working hours or meeting formats.
- **Meeting Norms:** The introduction of the **Neuroinclusion Policy** prompts managers to adopt more inclusive meeting norms, including providing materials in advance and reducing sensory overload in the work environment.

L&D (accessible training, alternative formats)

The Learning and Development (L&D) process is tailored to the needs of employees with disabilities.

- **Alternative Formats:** The organization offers the possibility to request communications (letters, statements, training materials) in alternative formats, including **Braille, Large Print, Audio, and colored paper**.
- **I&D Training and Recruitment:** I&D training is conducted throughout the Group. Mandatory inclusive hiring training for all recruiters is critical.
- **Focus on Managers:** The primary investment is in the **Neuroinclusion Toolkit**, aimed at managers. This shows an understanding that the success of inclusion critically depends on the skills of direct supervisors to apply policies in practice.

Assistive tech (hardware/software, support)



The provision of assistive technologies (AT) is integrated into the reasonable accommodations process.

- **Types of Support:** "Equipment & Technology Supports" are offered, covering a wide range of hardware and software solutions, including screen readers and specialized equipment.
- **AT Support:** Delivery and support are managed by IT and HR, using the RA Passport process.
- **Communication AT:** Text Relay (Relay UK) is supported for customer service for customers who are deaf, hard of hearing, or have speech impairments.

V. Talent Lifecycle Integration

8. Recruitment, onboarding & career progression (pipeline, inclusive job ads, interview formats, onboarding, mentors; internships/apprenticeships if applicable)

The integration of inclusion into the talent lifecycle is a strategic priority aimed at creating a **level playing field** for all candidates and employees.

Recruitment and Pipeline:

The goal is to create an inclusive recruitment environment that actively seeks and celebrates "different ways of thinking". This begins with job advertisements, where the option to request accommodations is provided via a dedicated online form. This proactivity ensures the process is accessible from the very beginning.

- **Culture and Competence:** All recruiters have completed **Inclusive Hiring training**.
- **Specialized Commitment:** A **Neuroinclusive Hiring Charter** has been introduced, specifying the commitment to fair hiring practices for neurodiverse candidates, aiming to remove barriers in the selection process.

Interview Formats and Support:

The organization offers reasonable accommodations at every stage of the selection process. These include:

- **Structural Accommodations:** Changes to the interview format, extra time, or providing questions in advance to assist with preparation.
- **Candidate Preparation:** A **Candidate Support Hub** is available, providing guides and information on the interview process, further reducing uncertainty and increasing candidate confidence.



Onboarding and Career Development:

- **Inclusion Passport:** The adjustment passport is introduced during onboarding or in the early stages of work. It is **transferable** and follows the colleague when they change roles or managers. This feature eliminates the so-called "moving penalty," where an employee must prove their needs repeatedly, which is critical for long-term retention.
- **Mentoring and Support:** Colleagues are encouraged to join networks such as the Accessibility Network and the Neuroinclusion Network, which provide internal support, guidance, and informal mentoring opportunities.

Targeted efforts in neuroinclusion, supported by leadership (such as statements from the CPO), transform inclusive hiring from mere compliance into a **corporate standard**, increasing the likelihood of permanent integration of diverse talents.

VI. Results, Impact, and Financial Viability

9. Results (specific examples from teams/offices)

The impact of this best practice can be evaluated through achieved external accreditations and specific operational improvements:

1. **External Recognition and Validation:** The organization achieved a historic success, becoming the first Irish company to receive the **Disability Smart Standard (DSS)** accreditation from the BDF, with "Bronze" status and an average score of 75% across ten business areas in 2021. This result is a strong indicator of institutional commitment.
2. **Improved Digital Accessibility:** Successful collaboration with the NCBI led to external testing and ensuring the accessibility of mobile banking for customers with visual impairments. This ensures that critical services are accessible and demonstrates commitment to WCAG 2.2 AA standards.
3. **Efficiency of RA Procedures:** The BDF external audit praised the **Reasonable Adjustments Guide and Passport** for being "clear and easy to follow". This is a direct result of institutionalizing support and ensures the process is operationally effective.
4. **Leadership in Neuroinclusion:** The development and active sharing of the **Neuroinclusion Toolkit** positions the organization as a leader in this specialized field, contributing to broader social change and building internal capacity.

10. Outcome indicators (0, 6, 12, 24 months)

Effective management of inclusive employment requires structured outcome measurement beyond traditional HR metrics. Although public annual reports do not contain specific



internal data on the hiring or retention of employees with disabilities, **projected KPIs** can be defined based on the tools introduced.

Monitoring & Documentation

The collection of sensitive disability data (Self-ID) is performed by HR Operations and the People Data Analytics Team, ensuring strict GDPR compliance. Data is stored confidentially in the HRIS, and information from the Inclusion Passport is managed according to the privacy policy.

| Indicator (KPI) | 0 Months (Baseline) | 12 Months (Projected Result) | 24 Months (Strategic Goal) | Significance/Relationship |
|--|-------------------------------------|----------------------------------|---|--|
| Self-Identification Rate (SIR) | 10% (Industry benchmark) | 15% (Post-Passport introduction) | 20% (Targeting 2x average) | Indicator of trust and workplace safety. Increasing SIR directly addresses the Disclosure Gap. |
| Accommodation Turnaround (TAT) | Unstandardized/High TAT | 40% reduction (via Passport) | < 10 working days for standard RA | Key factor for retention and productivity. Improvement reduces manager and employee frustration. |
| Retention (Disabled Colleagues) | Unknown (likely below average) | Equalization with average Rate | 90%+ of Group average Retention Rate | Directly measures RA Passport effectiveness in reducing turnover due to insufficient support. |
| Engagement Score | Average/Low for hidden disabilities | 10% increase for Passport users | Significantly higher than company average | Indicates increased engagement and sense of belonging. |

| Indicator (KPI) | 0 Months (Baseline) | 12 Months (Projected Result) | 24 Months (Strategic Goal) | Significance/Relationship |
|--|----------------------------|---|--|--|
| Hiring Rate (Specific Programmes) | Low (general process only) | Increase via Charter/ Training | Sustainable % of neurodiverse talent in key tech roles | Measures success of Neuroinclusive Hiring Charter. |
| Offer Acceptance Rate (OAR) | Industry average | 5-10% increase for candidates requesting RA | Consistently higher OAR in target groups | Indicator of positive candidate experience, supported by trained recruiters. |

11. Cost efficiency (adaptation expense, avoided turnover/sick leave costs, ROI)

The financial efficiency of inclusive employment is determined not only by the cost of adaptation (CPA) but primarily by **Avoided Costs** and the long-term return effect.

Industry experience shows that most reasonable accommodations are low-budget or free. The primary investment is in processes (RA Passport), L&D (Neuroinclusion Toolkit), and external audits (DSS).

Avoided Costs and ROI:

- 1. Reduced Turnover (Attrition):** The most significant ROI is generated from employee retention. When an employee leaves due to a lack of suitable adjustments (an issue observed in similar sectors), replacement costs – which include recruitment, onboarding, training, and loss of productivity – can exceed an annual salary. The **Inclusion Passport** directly reduces this risk by ensuring consistent support throughout an employee's career.
- 2. Increased Productivity and Innovation:** By removing the **Disclosure Gap**, the organization releases a significant amount of energy previously spent concealing a disability. This energy is redirected toward work, leading to increased productivity and innovation.
- 3. Regulatory Risk:** Proactively using an accredited framework (DSS) and standardized processes (RA Passport) represents a strong defense against claims of discrimination and non-compliance with the Equality Act. Avoiding a single regulatory dispute can offset the annual costs of the entire I&D program.



Despite the lack of specific public ROI data, the organizational model focusing on institutionalizing support and increasing Self-ID is designed to achieve high ROI by capitalizing on hidden talent and minimizing turnover costs.

VII. Strategic Sustainability and Transferability

12. Success factors (leadership, training, partnerships, tooling, clear SLAs)

The model's success is due to a combination of strategic commitment, operational standardization, and external expertise:

1. **Leadership Commitment:** I&D is embedded in the core corporate purpose ("Helping you thrive"), ensuring initiatives are not isolated projects but strategic imperatives supported by senior management.
2. **Tooling and Standardization:** The **Reasonable Adjustments Passport** is the most critical operational factor. It eliminates the repetitive administrative burden associated with adjustment and ensures consistency, which is a direct response to employee retention concerns.
3. **Strategic Partnerships:** Collaboration with organizations like the BDF (for audit and framework), NCBI (for digital testing), and Auticon (for specialization in neuroinclusion) provides access to leading expertise and external credibility.
4. **Training and Competence:** Investments in mandatory inclusive hiring training and the specialized Toolkit for managers increase cultural and operational competence at all levels.
5. **Clear Frameworks:** The use of the Disability Smart Standard imposes clear, measurable standards across ten business areas, ensuring systemic coverage of all inclusion aspects.

13. Challenges & solutions (attitudes, logistics, budget, procedures, data security)

The implementation of a comprehensive inclusion strategy meets several significant obstacles, which the organization addresses through structural solutions:

| Challenge | Problem Description | Applied Solution |
|--------------------------------------|--|---|
| Cultural Attitudes and Stigma | Fear of disclosing disability (Disclosure Gap) due to being perceived as "less capable". | Introduction of the RA Passport, turning disclosure into a professional, supported process. Active communication about the value of neurodiversity. |



| Challenge | Problem Description | Applied Solution |
|--------------------------------|--|--|
| Procedural Inefficiency | Slow implementation of adjustments or the need to repeat the request upon changing manager/role. | Inclusion Passport – ensures agreed adjustments are portable and not re-evaluated during management changes. |
| Lack of Expertise | Insufficient competence among managers, particularly regarding neurodiversity. | Development of a specialized Neuroinclusion Toolkit and targeted training, decentralizing expertise. |
| Data Security (GDPR) | Managing highly sensitive health information disclosed during an adjustment request. | Clearly defined policies and Passport process ensuring data is stored confidentially and shared in a controlled manner by the employee, solely for support purposes. |

14. Sustainability (how it is maintained: budget, training, annual reviews, accessibility audits)

Program sustainability is guaranteed through embedded mechanisms for continuous review and improvement, rather than relying on one-off projects.

- **Cyclical Audit (BDF DSS):** The most important sustainability mechanism is the cyclical evaluation according to the **Disability Smart Standard**. This framework requires periodic audits across ten business areas, ensuring the company does not stagnate after reaching an initial level (Bronze) but works toward achieving Silver or Gold.
- **Budgeting:** I&D initiatives and networks are funded centrally, while costs for standard reasonable accommodations are integrated as operational expenses (Opex), ensuring their constant availability.
- **Continuous Training:** Through annual reviews and updates of tools (like the Neuroinclusion Toolkit) and mandatory I&D training, cultural competence is maintained even with employee turnover.
- **Technology Updates:** Commitment to WCAG 2.2 AA requires continuous testing and updating of digital assets, ensuring accessibility evolves alongside technological progress.

15. Transferability (minimum conditions, steps, resources, risks)

The inclusion model focusing on DSS accreditation and the adjustment Passport is highly transferable, especially for large organizations operating in regulated sectors.



Minimum Conditions for Replication:

1. **Executive Commitment:** The initiative must be sponsored at the executive committee level and embedded in the company's core mission.
2. **External Framework:** Adoption of an externally recognized evaluation framework (DSS, NOD Blueprint, or equivalent) is necessary to provide a structured path for improvement.
3. **Support Standardization:** Implementation of a **Reasonable Adjustments Passport** to remove operational barriers and increase employee trust.

Key Steps for Replication:

1. **Current State Assessment:** Perform an internal audit (Month 0) to evaluate the Disclosure Gap and the current state of physical and digital accessibility.
2. **L&D Investment:** Invest in mandatory inclusive hiring training for recruiters and develop a specialized toolkit for managers.
3. **Pilot Passport Implementation:** Launch the RA Passport in key departments, supported by a trained HR team.
4. **Specialization:** After achieving general accessibility, target specialized areas like neuroinclusion through the development of targeted policies and partnerships with experts (e.g., following the Auticon example).

Risks during Transfer:

The main risk is related to **cultural resistance or insufficient engagement of direct managers**. If the adjustment Passport is not applied effectively by managers, it can lead to cynicism among employees and reduce the level of self-disclosure (Self-ID), invalidating the entire process. Another risk is the lack of a long-term budget to maintain digital accessibility according to high WCAG 2.2 AA standards.

16. Sources & contacts

The following sources were used to build this analysis, providing a framework for evaluating policies, reports, and commitments:

1. Bank of Ireland – Inclusion and Diversity Strategy Overview.
2. Bank of Ireland – Reasonable Accommodations Request Form (Candidate Support Hub).
3. Bank of Ireland – Neuroinclusion Policy and Hiring Charter.
4. Bank of Ireland – Accessibility Statement (WCAG 2.2 AA Commitment).
5. Bank of Ireland – Code of Conduct (Anti-discrimination).
6. Business Disability Forum (BDF) – Disability Smart Standard Accreditation (2021).
7. AHEAD Ireland – Employer Attitudes Survey (Data on motivation and innovation).
8. Lawsociety.ie, based on Heidrick and Struggles Report (Data on Disclosure Gap and leadership qualities).



9. Irish Wheelchair Association (IWA) (Context for other best practices in Ireland).

Conclusions

The analyzed model of inclusive employment in Ireland's financial sector demonstrates maturity achieved through the transition from minimal regulatory compliance to proactive institutionalization of support. Success is due to three main pillars:

1. **Institutionalization via External Audit:** The commitment to the **Disability Smart Standard (DSS)** transforms inclusion into a measurable and auditable business process, ensuring continuity and executive-level engagement.
2. **Operational Standardization:** The implementation of the **Inclusion Passport** directly addresses the greatest challenge – the **Disclosure Gap**. By removing administrative burdens and ensuring portability, the organization builds the cultural trust necessary to unlock the full potential of the workforce.
3. **Specialized Focus:** The development of targeted policies and toolkits for **neuroinclusion** shows a strategic understanding that investment in cognitive diversity leads to tangible business benefits, such as increased innovation and problem-solving capability.

The model is highly transferable, requiring any organization to start with an assessment of its Disclosure Gap, followed by investment in standardized adjustment tools and specialized training for managers to ensure support is applied effectively and quickly, thereby ensuring long-term ROI through talent retention and reduced operational costs.

SOURCES

1. Bank of Ireland (BoI) – Corporate sources and policies

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2. Accreditations and external partners

- URL: <https://businessdisabilityforum.org.uk/sites/www/files/2024-03/LLOYDS-WORKPLACE-ADJUSTMENTS-CASE-STUDY1.pdf>
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- URL: <https://nod.org/for-employers/disability-inclusion-blueprint/>

3. Irish institutions and experts

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