



Disability and Reasonable Accommodations Policy

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1.0 Purpose

The Irish College of GPs (the College) is committed to equality and inclusion so that barriers for people with a disability or a long-term condition are understood and addressed to enable them to perform effectively. The College recognises the importance of inclusive learning, teaching, research and assessment methods in meeting the needs of all learners and strives to incorporate necessary measures to enhance all aspects of a trainee or applicant's engagement with the National Specialist Training Programme in General Practice (Training Programme).

Whilst this policy is framed around the legal definition of disability, the College's inclusive philosophy means that it focuses on removing barriers by promoting a culture of fairness and success, and through making reasonable accommodations. It is not about establishing whether a condition qualifies as a disability or a long-term condition. It is intended to ensure that applicants and trainees with a disability or long-term condition have access to a holistic learning experience on the Training Programme in an inclusive and equitable manner.

This policy provides a framework for the provision of reasonable accommodations (also known as reasonable adjustments) for GP Training Programme applicants and trainees who have disclosed a disability or long-term condition to the College.

1.1 Legislation

The Disability Act, 2005 defines disability as “a substantial restriction in the capacity of the person to carry on a profession, business or occupation in the State or to participate in social or cultural life in the State by reason of an enduring physical, sensory, mental health or intellectual impairment.”

“Substantial restriction” is a restriction which—

- (a) is permanent or likely to be permanent, results in a significant difficulty in communication, learning or mobility or in significantly disordered cognitive processes, and
- (b) gives rise to the need for services to be provided continually to the person whether or not a child or, if the person is a child, to the need for services to be provided early in life to ameliorate the disability.”

The Equal Status Act, 2000 defines “disability” as follows:

- “(a) the total or partial absence of a person's bodily or mental functions, including the absence of a part of a person's body,
- (b) the presence in the body of organisms causing, or likely to cause, chronic disease or illness,
- (c) the malfunction, malformation or disfigurement of a part of a person's body,



- (d) a condition or malfunction which results in a person learning differently from a person without the condition or malfunction, or
- (e) a condition, disease or illness which affects a person's thought processes, perception of reality, emotions or judgement or which results in disturbed behaviour”

A reasonable accommodation (or reasonable adjustment) is any intervention or action to ameliorate a substantial disadvantage due to a disability. In the operation of this policy, the College is guided by the Equal Status Act, 2000 which prohibits discrimination in the provision of goods and services including educational services as follows:

“... discrimination includes a refusal or failure by the provider of a service to do all that is reasonable to accommodate the needs of a person with a disability by providing special treatment or facilities, if without such special treatment or facilities it would be impossible or unduly difficult for the person to avail himself or herself of the service.”

2.0 Scope

This policy and its corresponding procedures apply to GP Training Programme applicants and trainees with a disability or long-term condition who have disclosed their condition to the College. The condition may have existed at the time of application to the Training Programme or may have manifested itself whilst in training.

Environmental and organisational issues such as lack of appropriate clinical management or other lack of reasonable accommodations needed for the fulfilment of the trainee’s employment contract with the HSE are outside the scope of this policy. Trainees should refer to their relevant HSE Human Resources or Occupational Health department for support.

The College will make every reasonable effort to work with the trainee’s employer to arrive at a solution that meets everyone’s needs. However, there may be instances where the College or the employer is unable to provide reasonable accommodations. For example, this policy does not cover those who are unable to fulfil contractual requirements with the HSE due to their disability or long-term condition, though Scheme Directing Team may refer such trainees to the Occupational Health NCHD Hub to explore potential support options.

This policy does not apply to MICGP examinations. The reader is referred to the MICGP exam regulations for more information.

3.0 Policy statement

3.1 General principles

The College is committed to ensuring that applicants and trainees with a disability or long-term condition are not discriminated against in their interactions with the College. It also seeks to promote equality of opportunity for applicants and trainees.

The College will provide reasonable accommodations to an applicant or trainee with a disability or long-term condition to the extent the Training Programme can accommodate their needs whilst ensuring all programme requirements and criteria for the Certificate of Satisfactory Completion of Specialist Training (CSCST) are met, as defined in the Training Agreement, as well as any other requirements set by the Training Programme. An accommodation is considered reasonable if it appropriately balances the interests of all parties involved.

Applicants and trainees are encouraged to disclose any disability or long-term condition to allow for an assessment of their individual needs and, where applicable, collaboration with the employer to provide reasonable accommodations. This fosters a supportive environment that facilitates their participation in the Training Programme, insofar as is possible. Without a disclosure, reasonable accommodations cannot be implemented.

In accordance with their employment contracts, the Irish Medical Council's Guide to Professional Conduct and Ethics for Registered Practitioners and the Training Agreement, trainees are required to disclose any condition or disability that could impair their ability to practise medicine, impact a specific area of clinical practice, affect full engagement with training, or compromise their ability to meet the requirements for CSCST and independent general practice. Failure to disclose such a condition may result in disciplinary action.

While the College is committed to offering appropriate supports and adjustments, it is the responsibility of the trainee to meet the professional and educational requirements as outlined in the Trainee Agreement. Reasonable accommodations are intended to support trainees in achieving these standards, but do not remove or alter the core competencies and expectations of the Training Programme.

Reasonable accommodations must be made in line with the inherent requirements for safe and competent general practice and must not compromise the integrity of the training programme. The expected level of clinical competence is the same for all trainees and cannot change as part of a reasonable accommodation arrangement.

3.2 Reasonable Accommodations

Reasonable accommodations are measures implemented by the College, in some cases in collaboration with the employer, to ensure that all applicants and trainees have equal opportunity to participate in all aspects of recruitment and perform effectively and to the required standard in training towards attainment of CSCST.

There are no clear definitive rules on what is reasonable, and it depends on a range of factors, including:

- The effectiveness of the accommodation in preventing the disadvantage;
- The extent to which implementation is practical;
- The cost and availability of the resources, including external services and finance;
- Whether any adjustments have already been made;
- Any impacts of changes on other applicants, trainees, College staff, trainers, the training programme and the resources available to the training programme.

3.2.1 Ability to provide reasonable accommodations

Specific conditions and duties under which a trainee or a general practitioner is expected to perform in independent practice are set out in the Medical Council's Guide to Professional Conduct and Ethics. There may be instances where accommodations for an applicant or a trainee with a disability or long-term condition may not be possible, sufficient or practical, such as:

- Where the provision of accommodations or measures would place a disproportionate burden, cause major difficulties or unreasonable costs to a person or to the College;
- Where the provision of accommodations or measures is out of the College's control or ability to provide (e.g. the employer determined they are unable to provide reasonable accommodations);
- Where, even with the provision of all appropriate accommodations, the trainee is unable to fulfil the inherent requirements of the training programme;
- Where an applicant or a trainee with a disability or long-term condition has an infectious disease or other condition that requires isolation in order to protect their health and welfare or the health and welfare of others, and where the College (or the employer as the case may be) is unable to provide reasonable accommodations that will enable the applicant or trainee to receive relevant services and facilities so that they may continue with their training;
- Where, even with the provision of all appropriate accommodations, it is not possible to meet occupational health and safety requirements;
- Where extensions of time to complete the training programme would adversely affect the integrity of the certification process;
- Where restructuring of duties (e.g. on-call or out of hours duties) comprises duty hours for other trainees or has an adverse effect on other trainees.

Before claiming that the College cannot provide reasonable accommodations, the Selection Team or Scheme Directing Team as the case may be, in collaboration with the relevant Regional Programme Director, GP Training Directorate and/or the Trainee Health & Wellbeing Manager where needed must:

- Thoroughly consider how an accommodation might be made;
- Discuss this directly with the applicant or trainee involved;

- Consult relevant sources for advice;
- Present a rational and coherent justification for the decision.

3.3 Notifying the College

An applicant who believes they may need reasonable accommodations should contact the GP Training Selection Team (Selection Team) at the earliest reasonable opportunity.

A Trainee who believes they may need reasonable accommodations should contact the Scheme Directing Team and/ or Trainee Health & Wellbeing Manager at the earliest reasonable opportunity and complete or revise their Annual Trainee Declaration. If applicable, the trainee should also contact their employer's Human Resources or Occupational Health department for an assessment with respect to their work environment. The Trainee Health & Wellbeing Manager is available to support the trainee navigate the occupational health assessment process with the employer.

An applicant or trainee must provide adequate notice of the need for accommodation and the necessary documentary evidence to support this request.

It is the responsibility of the applicant or trainee to provide supporting evidence by appropriately qualified health professionals as to the condition which gives rise to the request. Any expenses related to seeking relevant assessments and documentation will be paid by the trainee.

3.4 Needs assessment

Needs assessments for reasonable accommodations will be carried out on an individual basis. While two applicants or trainees may present with similar needs, the context in which those needs arise may differ; therefore, the same accommodations may not be appropriate in all cases. Accommodations granted do not create a precedent but may be considered as part of a broader understanding when reviewing other applications.

The assessment will consider:

- The nature and impact of the applicant's or trainee's disability or long-term condition;
- The requirements of the Training Programme;
- Individual differences in how conditions present and are experienced.

All assessments must be supported by relevant medical documentation from a qualified specialist that confirms the presence of a disability or long-term condition.

Where appropriate, the College may request that the applicant or trainee undergoes specialist assessment for diagnostic support or guidance. This may include but is not limited to occupational health assessment through the employer.



3.4.1 Standard reasonable accommodations

Standard accommodations are typically minor, low-impact adjustments that can be implemented without significant changes to programme structure or assessment integrity. These adjustments are intended to ensure equal participation and access, enabling individuals to engage fully on the same basis as other applicants or trainees.

These accommodations can typically be agreed upon by the relevant team (e.g. Selection Team, SDT) in consultation with the applicant or trainee and the Trainee Health & Wellbeing Manager.

3.4.2 Non-standard reasonable accommodations

Non-standard accommodations are more complex, may impact the delivery of the training programme or assessment processes, and typically require higher-level consultation and review. These may involve structural or procedural changes.

Non-standard accommodations typically require a formal needs assessment and approval from the Regional Programme Director and may involve input from the National GP Training Unit or other relevant stakeholders.

The reader is referred to the corresponding procedures for more information.

3.5 Notification of College decision

Upon reaching a decision on an applicant's request for reasonable accommodations, the Selection team will inform the applicant in writing and include next steps.

Upon reaching a decision on a trainee's request for reasonable accommodations, the Scheme Directing Team will inform the trainee in writing and include next steps.

3.6 Employer interface

In assessing and implementing reasonable accommodations, the Scheme Directing Team (SDT) may collaborate with the employer. However, trainees may also need to engage directly with their employer to explore available reasonable accommodation options and determine the most effective means of implementation. To support coordinated efforts, trainees who are working with their employer's Occupational Health department to obtain accommodations are expected to inform their SDT, ensuring effective collaboration and alignment of support.

Matters related to employment equality rights, health, safety and welfare at work (including risk assessments), organisation of working time fall within the purview of the employer. The trainee should refer to



their contractual rights and obligations per their NCHD contract and engage with their respective HR representatives and/or occupational health and safety department for advice.

3.6.1 Continuity and handover

Progression through the training path for the trainee with a disability or long-term condition requires sequential handover from post to post. The Scheme Directing Team should inform the Trainee Health & Wellbeing Manager, and work with the employer to ensure that adequate notification has been forwarded to the next post.

3.7 Competency and progression

A trainee availing themselves of reasonable accommodations will not act as an impediment to progression and certification.

Trainees with a disability or a long-term condition who receive reasonable accommodations or choose not to avail themselves of reasonable accommodations must be fully competent and capable to fully engage with training and ultimately undertake the duties attached to the role of general practitioner.

The training scheme's Competency Progression Committee will assess all trainees' performance against the same standards. The CPC may not use a trainee's condition as a mitigating factor for a lack of satisfactory progression for their stage of training. Furthermore, a trainee with a late diagnosis or one who fails to disclose an existing disability or long-term condition for which reasonable accommodations may have been available is strongly advised to seek medical assessment and explore options for reasonable accommodations. Late diagnosis or disclosure will not see their competency progression re-assessed, and current and past CPC recommendations will remain.

The CPC reviews trainees' performance holistically and may also review information related to the accommodations provided with a view to assessing the effectiveness of such accommodations and/or to suggest alternative accommodations.

Only in exceptional circumstances and for the purposes of recommending alternatives for reasonable accommodations, the CPC or Regional Competency and Progression Advisory Committee (RCPAC) may request access to the trainee's health-related information in accordance with section 4.0.

Failure to demonstrate capability to undertake training, including failure to meet the stated outcomes in the plan for reasonable accommodations, may result in the trainee's referral to the Progression Review Committee (PRC) for consideration of their suitability to undertake GP training. The reader is referred to the Competency and Progression Committee process and rules of procedure and Progression Review Policy for more details.

3.8 Reasonable accommodations during the Selection Process

Special consideration of the needs of an applicant with a disability or long-term condition may be required to enable equal opportunity during intake process, including the Situational Judgement Test (SJT), Clinical Problem Solving Test (CPST) and interview. However, accommodations will not be made if the psychometric soundness, fairness and security of the tests or overall intake process are threatened.

Requests for reasonable accommodations because English may be a candidate's second language will not be considered, even where a candidate believes that this impairs their ability to participate. Proficiency in English is a mandatory requirement for medical registration in Ireland.

Requests for reasonable accommodations to SJT/CPST because a candidate experiences anxiety or phobias will not be approved unless supported by a specific and professionally recognised diagnosis found in the Diagnostic and Statistical Manual of Mental Disorders (DSM). Test/examination anxiety is not a recognised diagnosis according to the DSM-5.2.

3.9 Recordkeeping

A full written record of all reasonable accommodations requests is recorded using a standardised form and stored in a restricted SharePoint site for the relevant Training Scheme, or the Selection team, in accordance with the College's data management policies. The reader is referred to section 4.0 for more detail.

4.0 Data Protection and confidentiality

All aspects outlined in this policy must be carefully documented by those implementing it. Strict confidentiality of any case where an applicant or trainee may need or is receiving reasonable accommodations will be maintained. Information will be disclosed only on a need-to-know basis and within the rights to privacy afforded by the General Data Protection Regulation (GDPR).

Requests for reasonable accommodations are voluntary and therefore only the most necessary personal data must be processed by the College. Nevertheless, withholding relevant personal information, including health information, may impede the College's ability to provide effective reasonable accommodations.

Personal data collected through the GP Trainee may be processed on the basis of:

- Article 6(1)(b): personal data may be necessary to be processed to fulfil a contractual obligation
- Article 6(1)(c): personal data may be necessary to be processed to comply with a legal obligation imposed by laws for example, the Disability Act and Equal Status Act, the GDPR or the Medical Practitioners Act
- Article 6(1)(e): personal data may be necessary to be processed for public interest



In addition to the above, special category data such as Health Data or related information may be processed in accordance with:

- Article 9(2)(a): special category data may be processed on the basis of the explicit consent of the GP Trainee
- Article 9(2)(g): special category data may be processed for reasons of substantial public interests based on Union or Member State law

As reliance is placed on explicit consent, Article 7 of the GDPR states elements that must be satisfied for consent obtained to be appropriate:

- Consent sought must be demonstrated through an affirmative action that the individual undertakes such as checking an unchecked box. Once consent is obtained the College must record the date when the consent was provided by the individual.
- Consent must be sought in clear and plain language that must be easily accessible and specific as to the data and the activity that it relates to.
- The individual must be informed about the right to withdraw consent at any time during the processing activity. It is essential that the withdrawal of consent is as easy as possible for the individual. The withdrawal of consent can only stop prospective processing of data and not the processing that has already been carried out prior to the exercise of the right.

4.1 Explicit consent

Under this policy and corresponding procedures, explicit consent will be sought for processing health-related information obtained from the applicant or the trainee the following purposes:

- Assessing applicant and trainee needs and providing reasonable accommodations;
- Sharing and discussing health-related information with the trainee's employer to coordinate the assessment of trainee needs and implement reasonable accommodations at current and future training sites;
- The CPC process;
- The CPC or RCPAC assessment of other possible options for reasonable accommodations or adequacy of referral to the PRC.

While there is no data sharing envisioned beyond that necessary to provide effective reasonable accommodations and assessing training progress, patient safety is at the centre of the policy and procedures and disclosure of health-related information may be made to the authorities should there be a legitimate or vital interest to protect patient safety or the safety of others.

Health-related information must not be recorded on GPEP without the trainee's explicit consent. References to a trainee's medical condition which requires reasonable accommodations may be made in general terms in



CPC or RCPAC meeting minutes and reports when they are material to the trainee's assessment. Any specific references must be avoided unless it has a substantial material bearing on the trainee's assessment and prior explicit consent was obtained from the trainee. Only in exceptional circumstances should the CPC or RCPAC be provided with a trainee's health information.

The reader is referred to the Competency and Progression Review Committee Process and Rules of Procedure and Procedure at the Progression Review Policy for more information.

Health-related information will be kept by the College for the purposes of supporting the GP Trainee under this policy and procedures. Health-related data will be securely destroyed in accordance with the College's Records Retention Policy upon conclusion of the support process, including review by the Progression Review Committee.

Trainees should be provided with a Privacy Notice that can be found on the College's website. This notice must be easily accessible and can be attached as a hyperlink.

Any concerns regarding data protection matters may be raised with the College's Data Protection Officer (DPO) at dataprotection@icgp.ie. The DPO must also be informed at the earliest regarding any Data Subject Access Request or Data Breaches / Incidents that may be received or occur respectively by email.

5.0 Reviews

Where a request is rejected or considered by the trainee or applicant to be unsatisfactory, they will have one further opportunity to re-submit the request for review to their Scheme Directing Team or Selection Team as appropriate within five (5) working days or as soon as is practicable depending on the complexity of the request.

6.0 Roles and responsibilities

Scheme Director	Responsible for overseeing the implementation of reasonable accommodations within the training scheme, facilitating communication between the trainee, trainer, and support services, and ensuring that accommodations are effectively integrated into the training programme.
Trainee Health & Wellbeing Manager	• Available to provide support to trainees experiencing difficulties related to disability or long-term condition. • Available to Scheme directing teams to discuss reasonable accommodations. • May signpost trainees to relevant support services.
Competency Progression Committee (CPC)	CPC will assess trainee performance against the requirements appropriate to their stage in training. Nevertheless, the CPC will also consider whether or not the reasonable accommodations provided are effective and sufficient, ensuring that decisions are fair and in line with the principles of equity and inclusion for all trainees.
Regional Competency Progression Advisory Committee (RCPAC)	CPC may request advice from RCPAC on suitable options for reasonable accommodations or whether or not the reasonable accommodations provided are effective and sufficient, ensuring that decisions are fair and in line with the principles of equity and inclusion for all trainees.
Trainee	• Responsible for disclosing any disability or long-term condition that may impact their training, engaging in the assessment, identification of options for reasonable accommodations and implementation of appropriate reasonable accommodations. • Requesting accommodations. • Providing all complete and accurate relevant documentation to support their application for accommodation. • Identifying the nature of the condition which gives rise to the request. • Providing relevant documentation to enable the College to perform its responsibilities and commitments under this policy. • Fulfilling their responsibilities in conjunction with the agreed reasonable accommodations.

	• Maintaining regular contact with the relevant College staff on the effectiveness of the reasonable accommodations received.
National GP Training Unit	As needed, review and make decisions on requests for reasonable accommodations from applicants to the GP Training Programme.
National GP Training Directorate	As needed, reviews and makes decision on requests for reasonable accommodations from trainees.
Employer	Must ensure employment law is upheld and employer duties discharged. Provides occupational health services. Is responsible for facilitating adaptations as indicated by occupational health.

7.0 Definitions

Standard Reasonable Accommodations	Typically minor, low-impact adjustments that can be implemented without significant changes to programme structure or assessment integrity. These adjustments are intended to ensure equal participation and access, enabling individuals to engage fully on the same basis as other applicants or trainees.
Non-standard Reasonable Accommodations	More complex adjustments may impact the delivery of the training programme or assessment processes and typically require higher-level consultation and review. These may involve structural or procedural changes.

8.0 Related and supporting documentation

- Reasonable Accommodations Procedures
- Trainee Support Policy
- Progression review Policy
- Irish Medical Council Guide to Professional Conduct and Ethics for Registered Practitioners
- Training Agreement

9.0 Contact

Quality Assurance and Enhancement

qae.training@icgp.ie