

THE TOWN OF THE PAS
POLICY AND PROCEDURE MANUAL

SECTION:	PART VII – ACCESSIBILITY FOR MANITOBANS ACT	
SUBJECT:	Accessible Employment Policy	POLICY CODE: AMA – 801 Policy & Procedure
ORIGINATED:	RESOLUTION NO.	

The Town of The Pas is committed to complying with the Accessibility Standard for Employment under The Accessibility for Manitobans Act. Our policies, practices and measures reflect principles of dignity, independence, integration and equal opportunity for people with disabilities.

We aim to remove barriers in our workplace. If a barrier cannot be removed, we seek to provide reasonable accommodations to affected employees.

The following policy statements, organizational practices and measures are intended to meet the requirements of Manitoba’s Accessibility Standard for Employment.

PRE-EMPLOYMENT ACCESSIBILITY REQUIREMENTS

1. Remove Barriers to Recruitment & Selection

During recruitment, the Town of The Pas informs potential applicants that reasonable accommodations are available during the selection process, and we respond to requests for accommodations.

- We include a statement on all job postings that reasonable accommodations are available to applicants with disabilities, and we seek their advice on how best to accommodate their needs.
- When making interview arrangements in writing or verbally, we inform applicants that reasonable accommodations are available during the assessment and selection process.
- When an applicant has made a request for an accommodation during the selection process we:
 - Consult with the applicant to determine the appropriate accommodation.
 - Put the appropriate accommodation in place during the assessment or selection process.

2. Mention Workplace Accommodations When Offering Employment

When hiring, the Town of The Pas informs selected applicants of our measures, policies and practices for accommodating employees with disabilities.

- We include information about workplace accommodations in our letter of offer to new employees.
- We include information about workplace accommodations in our new employee orientation materials.

EMPLOYMENT ACCESSIBILITY REQUIREMENTS

3. Inform Employees About Accommodation Policies & Practices

The Town of The Pas keeps employees informed about our accommodation measures, policies and practices for employees with disabilities. We also provide updates to employees when this information changes in the following ways:

- posted on bulletin boards within Town operated facilities
- posted in lunch rooms and high traffic areas
- with paystubs
- through discussions with the union, in person, by phone or e-mail
- during staff meetings

4. Communicate In a Way That Meets Employee's Needs

The Town of The Pas aims to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone.

If requested by an employee with a temporary or permanent disability we:

- Consult with the employee to identify the accessible formats, or communication supports needed when providing information to the employee.
- Ensure that identified accessible formats or communication supports are continually used when providing information to the employee.
- We provide information to employees in multiple ways to meet everyone's needs.

5. Provide Individualized Accommodation Plans

The Town of The Pas's policy is to provide reasonable accommodations by developing and documenting individualized accommodation plans for employee with disabilities who request them.

The individualized accommodation plan includes:

- accessible formats and communication supports, if requested
- workplace emergency response information, if requested
- details of how and when any other accommodation will be provided
- when the plan will be reviewed

Our employees will participate and cooperate in the accommodation process by:

- providing related information and taking part in the assessments, if required by the employer
- complying with the individualized accommodation plan
- offering ongoing feedback related to modifications, including whether the accommodation is no longer required

Supervisors will review the accommodation plan every three months and in combination with annual employee reviews.

Supervisors will also review an employee's individualized accommodation plan, and update if require when:

- the employee's workspace is modified or relocated
- the employee's responsibilities have changed
- other workplace changes have occurred that affect the accommodation

Procedure for Individualized Accommodation Plans:

a. Request for an individualized accommodation plan

We support employees by providing reasonable accommodations in the workplace. Employees may make a verbal, or written request to their manager, supervisor or human resource officer for an individualized accommodation plan.

b. Assessment of employee and accommodation required

- We will assess the employee and possible accommodations on an individual basis.
- We may request that the employee provide documentation from a health practitioner who supports the need for the accommodation.
- We may request, and cover costs for, an evaluation by an independent regulated health professional or other practitioner in the area of workplace accommodations for employees with disabilities.

c. Assistance for the employee in developing the accommodation plan

An employee may request assistance with developing the plan, including:

- Assistance from a representative of the union or another person who is knowledgeable about workplace accommodations for employees with disabilities.

d. Accessible Formats

We meet the communication needs of our employees by providing them with a copy of their plan or an explanation for denying the request to introduce a plan, in a format and with any communication support to meet the needs of the employee.

e. Reasons for denying a request

We may deny an employee's request for an individualized accommodation plan in the following circumstances:

- The employee is able to carry out most of the job without an accommodation
- The independent regulated health professional does not support the employee's self-assessed requirement for a workplace accommodation
- Our research and evidence shows that the accommodation request would cause undue hardship (e.g. by creating safety risks to other employees or a significant measurable financial burden).

f. Maintaining Privacy

We maintain employee privacy regarding accommodation plans and personal health information by following the practices below:

- We follow proper protocol when storing confidential employee information.
- We protect our employees' personal information and personal health information at all times by taking the following steps:
 - use confidential forms
 - files are locked in filing cabinets
 - access to files are limited to human resources and managers
 - employees may review their own file with a manager present

6. Manage Performance

The Town of The Pas ensures our Employee Performance Appraisals (Policy P-918) takes into account:

- that an employee may be temporarily or permanently disabled by one or more barriers in the workplace
- an employee's individualized accommodation plan
- that the accommodations provided for an employee may not fully address a workplace barrier
- Performance Appraisals for newly-hired employees will be done thirty (30) days prior to the completion of their probationary period
- Performance Appraisals are to be performed on an annual basis where existing or newly required workplace accommodations are discussed, including individualized accommodation plans and any assistance required during emergencies
- we speak with employees when they do not follow company policy or meet expectations in accordance with the Collective Agreement and Policy P-902A Staff Performance / Conduct Policy
- we discuss existing workplace accommodations and propose modifications or new workplace accommodations if we believe this could help improve the performance of an employee with a disability
- prior to imposing disciplinary measures, we consider whether there is a connection between concerns about job performance and workplace barriers

7. Provide for Career Development, Training, Internal Advancement & Reassignment

When providing career development, training or opportunities for internal advancement or reassignment, the Town ensures the process for recruiting and selecting candidates takes into account:

- that an employee may be temporarily or permanently disabled by one or more barriers in the workplace
- an employee's individualized accommodation plan

- that the workplace accommodation provided for an employee with a disability may not fully address the workplace barrier
- we recruit and select candidates based on the provisions outlined within the Collective Bargaining Agreement, such as current training, job experience, skills and number of years on the job
- if a candidate has an individualized accommodation plan, we ensure it is adequate to address any barriers presented by the new opportunity, or we modify the plan accordingly
- our training opportunities for career development are accessible to all employees. If a barrier is identified, we attempt to remove or reduce it.

8. Return to Work Process

The Town of The Pas's return to work procedure reflects our commitment to providing a safe and healthy working environment for employees who are, or have been, absent from work due to a disability or health condition, and require reasonable accommodation's to return to work.

The Town of The Pas's return to work procedure can be found in our Loss Prevention & Control Program Section 12.0. This procedure ensures reasonable accommodations for employees who are at work or absent due to a disability or health condition. We will make efforts to modify employees' duties and work schedule based on their functional abilities. Our aim is to increase duties safely to help employees reach their full potential.

- We keep in touch with absent employees and the Workers Compensation Board of Manitoba (when involved) throughout the employees
- We offer meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities
- We are flexible and tailor the return to work plan to the employee's needs.
- We ensure supervisors and co-workers support employees who have been absent due to a disability and participate in the return to work process.
- We educate staff on why returning to work is good for business and outline the expectations for supporting an employee in a modified role.
- We recognize that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions and we accommodate affected employees – see Policy P – 947 Town of The Pas Employees COVID-19 Response.

9. Provide Workplace Emergency Response Information

The Town of The Pas notifies all employees of the steps to be taken during emergencies, to ensure the safety of employees who are temporarily or permanently disabled. We ensure workplace emergency response information is specific to each employee's needs and the physical nature of the employee's workspace.

Once we learn an employee requires assistance during a workplace emergency, we offer the employee individual workplace emergency response information as soon as possible.

We annually send a memo to all employees to inquire whether they need assistance during an emergency and to remind them of the office or building's emergency plan.

We review the workplace emergency response information provided to an employee each time:

- the employee is moved to a different workspace
- the employee's workspace is modified
- we review our general emergency response plans and make changes that would affect the employee's response to an emergency in the workplace

If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, we obtain consent from the employee on who will assist, and we inform that person how to assist.

10. Maintain Privacy

The Town of The Pas protects the privacy and confidentiality of employee's personal information and personal health information. We only collect, use and disclose information as required for the purposes of the Accessibility Standard for Employment, unless otherwise agreed to by the employee.

We also follow the requirements of other privacy legislation, including The Freedom of Information and Privacy Act and The Personal Health Information Act.

- We follow proper protocol when storing confidential employee information.
- We protect our employee's personal information and personal health information at all times by taking the following steps:
 - use confidential forms
 - file storage is locked in the Assistant Chief Administrative Officer's Office
 - limited access to Managers only

11. Provide Training

The Town of The Pas provides training on how to accommodate employees with a disability to staff with the following responsibilities:

- recruiting, selecting or training employees
- supervising, managing or coordinating the work of employees
- promoting, redeploying or terminating employees
- developing and implementing employment policies and practices

Training content includes:

- how to make employment opportunities accessible to people with disabilities
- how to interact and communicate with applicants or employees who face barriers, use assistive devices, or are assisted by a support person or service animal
- an overview of The Accessibility for Manitobans Act and the Accessible Employment Standard
- our accessible employment policies, practices and measures, including updates and changes
- we train new employees and management during the orientation process of hire which is the first day of work
- we provide refresher training regularly, including informing staff about updates to policies and practices.
- Human Resources and Managers maintain records of who has taken training and when

12. Keep a Written Record of Accessibility & Training Policies

The Town of The Pas keeps a written record of our accessibility and training policies. Our written documents include a summary of the content of our training material and a list of dates when training is offered.

We let the public know that our policies are available upon request and we provide these in a format that is accessible for the user.

- We will let the public know that our accessibility and training policies are available in the following ways:
 - posted on our website and social media
 - posted at our service counter
 - through employees
- We provide our policies within a reasonable timeframe, and in a format that meets the needs of individuals with a disability, at no additional cost.