Employment Accessibility Policy (ICM)

Effective: May 1, 2022

As an organization committed to Diversity, Equity, and Inclusion, International College of Manitoba (ICM) strives to provide a safe and welcoming working environment for all employees. Adhering to **The Accessibility for Manitobans Act** (**AMA**) and other relevant legislation, this policy specifies measures and practices that ICM undertakes to provide reasonable accommodations for applicants and employees at various stages of employment.

ICM's policies, practices, and measures reflect principles of dignity, independence, integration, and equal opportunity for people with disabilities. We are committed to assisting individuals with disabilities by identifying, removing, and preventing barriers to accessibility and meeting accessibility requirements under the AMA.

The *Employment Accessibility Policy* and the *Employment Accessibility Procedure* documents are available in alternate formats upon request.

SCOPE

This policy applies to all employees, including full-time, part-time, casual, sessional, apprentices, and seasonal employees.

DEFINITIONS

The following are terms used in this Policy:

a) Accessible Formats – communicating information in a way that works for a person disabled by a barrier, and includes, but is not limited to, large print, recorded audio, electronic formats, and braille.

b) Barriers – anything that interacts with a disability in a way that affects a person's full and effective participation in everyday life, including, but not limited to, attitudinal, information/communication, architectural/environmental, technological, or systemic barriers.

c) Communication Support – a support used to help communicate with a person disabled by a barrier, and includes, but is not limited to, sign language, captioning, and augmentative and alternative communication supports.

d) Employee(s) – all full-time, part-time, casual, sessional, apprentices, and seasonal staff.

e) Individualized Accommodation Plan (IAP) – a document outlining the accessibility requirements of an employee which allows them to successfully perform their job, including the removal of barriers and inclusion of

workplace accommodations.

f) Manager(s) – all staff who as part of their job duties may participate in any of the following activities: recruitment, selection, or training of employees; supervising, managing, or coordinating the work of employees; promoting, redeploying, or terminating employees; or developing and implementing policies and practices.

g) Performance Management Process – any process used by ICM to manage the work of individual employees or to plan, monitor, and review an employee's work objectives and overall contribution to ICM.

h) Reasonable Accommodation – a modification or adjustment to a job or the workplace that enables an applicant or employee to perform their employment responsibilities or access the benefits available to them, by virtue of their employment.

i) Return to Work – a plan to assist in a timely and safe return to the work environment. This involves the discussion and documentation of potential accommodations for a successful transition from a leave of absence to a graduated return to work and/or to full-time work.

POLICY CONTENT

Throughout the employment lifecycle, prospective and hired employees will be informed of ICM's accommodation/removal of barriers practices and managers will be knowledgeable in how to respond to these accommodation/removal of barriers requests.

Recruitment & Selection

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

During the hiring process, ICM informs selected applicants of our measures, policies, and practices for accommodating employees with disabilities.

When offering employment, ICM provides new employees and managers with detailed information on the
Employment Accessibility Policy and *Employment Accessibility Procedures*.

Training

ICM provides training on how to accommodate employees with a disability to employees with the following responsibilities:

a) recruiting, selecting, or training employees
b) supervising, managing, or coordinating the work of employees
c) promoting, redeploying, or terminating employees
d) developing and implementing employment policies and practices

ICM's policies are available to the public upon request and are provided in a format accessible for the user.

Further information on the training provided by ICM, including the content of training, can be found in ICM's
Employment Accessibility Procedures.

Performance Management

During performance management, ICM takes into account:

a) that an employee may be temporarily or permanently disabled by one or more barriers in the workplace;
b) an employee's IAP, if any; and
c) that the accommodations provided for an employee may not fully address a workplace barrier.

Informing Employees & Communication

ICM keeps employees informed about its accommodation measures, policies, and practices for employees with disabilities. ICM also provides updates to employees when this information changes.

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

Return to Work Policy

ICM's Return to Work plan reflects its commitment to providing a safe and healthy working environment for employees who are, or have been, absent from work due to a disability and require reasonable accommodation to return to work.

Our Return to Work plan facilitates reasonable accommodations for employees who have been absent due to a
disability or health condition. We will make efforts to modify employees' duties and work schedules based on
their functional abilities. ICM's aim is to increase duties safely to help employees reach their full potential.

Further information regarding ICM's Return to Work policy can be found in ICM's
Employment Accessibility Procedures.

Individualized Accommodation Plans (IAPs)

ICM provides reasonable accommodations by developing and documenting IAPs for employees with disabilities who request them.

Further information regarding ICM's IAPs can be found in ICM's *Employment Accessibility Procedures*.

Workplace Emergencies

ICM notifies employees of steps to be taken during emergencies. We further provide employees with disabilities the opportunity to prepare individualized emergency response information plans when necessary to assist them in the event of an emergency.

ICM reviews the workplace emergency response information provided to an employee each time:

a) the employee is moved to a different workspace;
b) the employee's workspace is modified; and/or
c) ICM reviews its general emergency response plans and makes changes that could 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, ICM obtains consent from the employee seeking accommodations to authorize the sharing of their Individualized Accommodation Plan with ICM Fire Wardens, who will assist during emergencies.

Non-Compliance

If an employee refuses or fails to follow the requirements of the *Employment Accessibility Policy* and *Employment Accessibility Procedures*, they may be subject to disciplinary action, up to and including termination of employment.

REVIEW

Policy review shall be conducted every two (2) years. The next scheduled review date for this Policy is **May 1, 2024**.

Employment Accessibility Procedure (ICM)

Effective: May 1, 2024

INTRODUCTION AND GENERAL GUIDELINES

As an organization committed to Diversity, Equity, and Inclusion, International College of Manitoba (ICM) strives to provide a safe and welcoming working environment for all employees. Adhering to **The Accessibility for Manitobans Act** (**AMA**) and other relevant legislation, these procedures ensure that throughout the
employment lifecycle, prospective and hired employees are informed of ICM's accommodation/removal of barriers practices. ICM Managers will be knowledgeable in how to respond to these accommodation/removal of barriers requests.

The *Employment Accessibility Policy* and the *Employment Accessibility Procedure* documents are available in alternate formats upon request.

DEFINITIONS

The following are terms used in this Procedure:

a) Accessible Formats – communicating information in a way that works for a person disabled by a barrier, and includes, but is not limited to, large print, recorded audio, electronic formats, and braille.

b) Barriers – anything that interacts with a disability in a way that affects a person's full and effective participation in everyday life, including, but not limited to, attitudinal, information/communication, architectural/environmental, technological, or systemic barriers.

c) Communication Support – a support used to help communicate with a person disabled by a barrier, and includes, but is not limited to, sign language, captioning, and augmentative and alternative communication supports.

d) Employee(s) – all full-time, part-time, casual, sessional, apprentices, and seasonal staff.

e) Individualized Accommodation Plan (IAP) – a document outlining the accessibility requirements of an employee which allows them to successfully perform their job, including the removal of barriers and inclusion of workplace accommodations.

f) Manager(s) – all staff who as part of their job duties may participate in any of the following activities: recruitment, selection, or training of employees; supervising, managing, or coordinating the work of employees; promoting, redeploying, or terminating employees; or developing and implementing policies and practices.

g) Performance Management Process – any process used by ICM to manage the work of individual
   employees or to plan, monitor, and review an employee's work objectives and overall contribution to
   ICM.
h) Reasonable Accommodation – a modification or adjustment to a job or the workplace that enables an applicant or employee to perform their employment responsibilities or access the benefits available to them, by virtue of their employment.
i) Return to Work – a plan to assist in a timely and safe return to the work environment. This involves the discussion and documentation of potential accommodations for a successful transition from a leave of absence to a graduated return to work and/or to full-time work.

RECRUITMENT & SELECTION

Recruitment

ICM includes 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 arranging for interviews, ICM informs applicants that reasonable accommodations are available during the assessment and selection process.

When an applicant makes a request for an accommodation during the selection process, ICM:

a) consults with the applicant to determine the appropriate accommodation; and
b) provides the appropriate accommodation during the assessment or selection process.

Employment Offer

ICM includes information about workplace accommodations in its letter of offer to new employees.

Active Employment

Orientation & Onboarding

ICM includes information about workplace accommodations in our new employee orientation materials.

ICM shares its *Fire Safety Plan* and collects the *Emergency Information Worksheet* from all new employees,
facilitating employees' communication of accommodation needs in the event of an emergency.

Training

ICM's training includes:

a) how to make employment opportunities accessible to people with disabilities;
b) 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;
c) an overview of The Accessibility for Manitobans Act, The Human Rights Code (Manitoba), and the Accessible Employment Standard; and
d) ICM's accessible employment policies, practices, and measures, including updates or changes.

Training is provided to new employees and management, as required by the training section of the *Employment Accessibility Policy*, as soon as reasonably possible, and no later than one month after hiring. Refresher training is provided annually and includes informing employees about updates to policies, practices, and measures.

ICM keeps written records of accessibility training completion and training policies, including a summary of the content of training material and when it is offered.

Performance Management

Performance Development Plans are reviewed on a semi-annual basis for full-time permanent staff. ICM meets with new staff six months into employment and at least once annually to discuss progress, new goals, and any challenges. Existing or newly required workplace accommodations are discussed, including Individualized Accommodation Plans (IAPs) and any assistance required during emergencies.

ICM speaks with employees when they do not follow company policy or meet expectations, and offers a spoken and written warning of consequences, including disciplinary action. A Performance Improvement Plan may be developed as a result of these warnings, which includes discussion on any workplace accommodations that may be required to address observed behaviour.

ICM discusses existing workplace accommodations and proposes 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, ICM considers whether there is a connection between concerns about job performance and workplace barriers.

Career Development & Internal Advancement

ICM recruits and selects candidates based on objective criteria, such as current training, job experience, skills, and number of years on the job.

If a candidate has an IAP, ICM ensures it is adequate to address any barriers

presented by the new opportunity, or ICM modifies the plan accordingly.

ICM's training opportunities and methods for career development are accessible to all employees. If a barrier is
identified, ICM attempts to remove or reduce it.

Keeping Employees Informed

ICM provides information to employees about our policies for employees with disabilities and any updates in a number of ways specific to ICM, including, but not limited to:

a) posted on the ICM public website, the ICM Teams staff channel, BambooHR, and the Virtual Instructor Lounge;
b) memos, or through staff emails;
c) posted in the staff room or in high traffic areas;
d) included in posters, brochures, pamphlets, or advertisements;
e) through discussions with management (in person, by phone, or through email); and/or
f) during staff meetings.

Return to Work

ICM's Return to Work plan facilitates reasonable accommodations for employees who have been absent due to a disability or health condition, facilitating a safe and timely return to the work environment.

While the employee is on leave and throughout the return to work process, the employee's supervisor will serve as Return to Work Coordinator to oversee the employee's transition back to the workplace, who will ensure ongoing communication during the leave.

When planning for an employee's return to work, the employee's supervisor and Human Resources Department will confirm the worker's current abilities by seeking documentation from a health care practitioner who supports the need for the accommodation, emphasizing the employee's work-related abilities.

When related to a workplace injury, Human Resources will confirm work abilities with the Worker's Compensation Board of Manitoba (WCB), which will receive the injured worker's medical reports from healthcare providers, including diagnosis and prior injuries or illnesses.

ICM will determine if the employee can perform their existing job. If the employee cannot perform their existing job, ICM will determine if they can perform their job in a modified form.

If the employee cannot perform their job in a modified form, ICM will determine if they can perform an alternate job in its existing form. If the employee cannot perform an alternate job in its existing form, ICM will determine if they can perform an alternate job in a modified form.

The employee, the employee's supervisor, and the Human Resources Department will determine how the Employee can best return to work, using the *Return to Work Plan Offer & Outline* document to outline the mutually agreed upon Return to Work Plan.

Employees will also be asked to complete an updated Navitas *Employee Emergency Information Worksheet* to self-identify whether any additional assistance is required during a workplace emergency.

Individualized Accommodation Plans (IAPs)

ICM supports employees by providing reasonable accommodations in the workplace. An employee may make a verbal or written request to their manager, supervisor, or other human resources representative for an IAP.

Upon receipt of a request for an IAP, ICM:

a) will assess the employee's request(s) and possible accommodations on an individual basis;
b) may request that the employee provide documentation from a health care practitioner who supports the need for the accommodation; and/or
c) 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.

An employee may request a person who is knowledgeable in the area of workplace accommodations to assist in the development of their IAP.

Employees who request an IAP will participate and cooperate in the accommodation process by:

a) providing related information and taking part in assessments, if required by the manager;
b) complying with the approved IAP; and
c) offering ongoing feedback related to modifications, including whether the accommodation is no longer required.

An IAP will document:

a) any accessible formats and communication support to be used in providing information to the employee;
b) any workplace emergency response information, if required;
c) details of how and when accommodations will be provided; and
d) when the plan will be reviewed.

On request of an employee, ICM will provide a copy of the IAP to the employee in an accessible format. Supervisors will review the IAP on the three-month anniversary date and in combination with regular semi-annual employee reviews. Supervisors will also review an employee's IAP, and

update if required, when:

a) the employee's workspace is modified or relocated;
b) the employee's responsibilities have changed;
c) other workplace changes have occurred that affect the accommodation; and/or
d) the employee has made a request to review and update the IAP.

ICM maintains the privacy and confidentiality of employees' personal information, including health records. ICM only collects, uses, and discloses information as required for the purposes of the Accessible Employment Standard Regulation, unless otherwise agreed to by the employee. We also follow the requirements of other privacy legislation, including *The Personal Information Protection and Electronic Documents Act* (PIPEDA) and *The Personal Health Information Act (Manitoba)*.

ICM may deny an employee's request for an IAP in the following circumstances, among others:

a) the employee is able to carry out most of their job without an accommodation;
b) the independent regulated health professional(s) does not support the employee's self-assessed requirement of a workplace accommodation; or
c) the accommodation request would cause undue hardship to ICM.

In the event a request for an IAP is denied, ICM will provide the employee with written reasons for why their request was denied.

Employees dissatisfied with the outcome of their request for accommodations or the adherence to an agrees- upon IAP are to contact the Navitas North America Human Resources Director.

Communication of Information

To meet an employee's communication needs, if requested by an employee with a temporary or permanent disability, ICM:

a) Consults with the employee to identify the accessible formats, or communication supports needed when providing information to the employee.
b) Ensures that identified accessible formats or communication supports are continually used when providing information to the employee.

Workplace Emergency Response Information

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

ICM regularly discusses general accessibility and identifies barriers during Workplace Safety and Health meetings.

In a situation where any employee cannot safely exit the premises during an evacuation, with permission of the employee, ICM identifies someone to remain with this person in the designated safe area.

The appointed Fire Wardens ensure communication with these employees during the emergency by cellphone or other agreed-upon means. The Fire Wardens notify the fire department of the number and location of employees who remain in the building.

Non-Compliance

If an employee refuses or fails to follow the requirements of the *Employment Accessibility Policy* and *Employment Accessibility Procedures*, they may be subject to disciplinary action, up to and including termination of employment.

REVIEW

Policy review shall be conducted every two (2) years. The next scheduled review date for this Policy is **May 1, 2024**.