

# Accessible Employment

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Procedure #	-
Replaces	-
Revises	
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## 1. PRINCIPLES

The City of Dauphin is committed to complying with the Accessibility Standard for Employment under *The Accessibility for Manitobans Act*. The City of Dauphin’s policies and practices reflect the 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 and practices are intended to meet the requirements of Manitoba’s Accessibility Standard for Employment.

## 2. RECRUITMENT AND SELECTION

### Policy Statement:

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

### Practices:

- 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 processes.
- 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.



### 3. OFFERS OF EMPLOYMENT

#### **Policy Statement:**

When hiring, the City of Dauphin informs selected recipients of our policies and practices for accommodating employees with disabilities.

#### **Practices:**

- 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.

### 4. COMMUNICATIONS WITH EMPLOYEES

#### **Policy Statement:**

The City of Dauphin keeps employees informed about our accommodation policies and practices for employees with disabilities. We also provide updates to employees when this information changes. We aim to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone.

#### **Practices:**

- We provide information to employees about our policies for employees with disabilities and any updates in multiple ways, such as:
  - Email to staff
  - Policy binder/database
  - Posting in facility staffrooms
  - Including in posters, brochures, pamphlets, and advertisements
  - Including in staff meetings
- To meet an employee's communication needs, we ask the employee what accessible format or communication support is most appropriate for them.

### 5. INDIVIDUALIZED ACCOMMODATION PLANS

#### **Policy Statement:**

The City of Dauphin will provide reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities who request them.



### Practices:

- Employees may make a request for an individualized accommodation plan:
  - To their supervisor, either verbally or in writing.
  - With assistance from a CUPE representative if applicable, or another person who is knowledgeable about workplace accommodations for employees with disabilities.
- Supervisors will assess the need for an individualized accommodation plan:
  - On an individual basis.
  - They may request that the employee provide documentation from a health practitioner who supports the need for accommodation.
  - They 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.
  - They 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.
    - The employer's research and evidence show that the accommodation request would cause undue hardship (e.g. by creating safety risks to other employees or a significant measurable financial burden).
  - They will provide employees with a copy of their plan, or an explanation for denying the request, in a format and with any communication support to meet the needs of the employee.
- Individualized accommodation plans include:
  - Accessible formats and communication supports, if requested.
  - Workplace emergency response information, if required.
  - Details of how and when any other accommodations will be provided.
  - When the plan will be reviewed.
- Employees will participate and cooperate in an accommodation process by:
  - Providing related information and taking part in assessments, if requested 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:
  - On the six-month anniversary date and in combination with any other regular employee reviews.
  - If the employee's workspace is modified or relocated.
  - If the employee's responsibilities have changed.
  - If other workplace changes have occurred that affect the accommodation.
  - If the employee has made a request to review and update the accommodation plan .



- The City of Dauphin will maintain employee privacy regarding accommodation plans and personal health information by following the practices outlined in Section 10 below.

### 6. PERFORMANCE MANAGEMENT

#### Policy Statement:

The City of Dauphin ensures our performance management process 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.

#### Practices:

- We meet with new staff six months into employment and at least once annually to discuss progress, new goals, and any challenges. Existing or newly acquired workplace accommodations are discussed, including individualized accommodation plans and any assistance required during emergencies.
- We speak with employees when they do not follow City of Dauphin policies or meet expectations, and offer a spoken and written warning of consequences, including disciplinary action.
- 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. CAREER DEVELOPMENT, TRAINING, INTERNAL ADVANCEMENT, AND REASSIGNMENT

#### Policy Statement:

When providing career development, training, or opportunities for internal advancement or reassignment, we ensure 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.

Our practices aim to ensure that workplace accommodations do not negatively affect access to career development.



### Practices:

- We recruit and select candidates based on objective criteria, 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 program and methods for career development are accessible to all employees. If a barrier is identified, we attempt to remove or reduce it.

## 8. RETURN-TO-WORK PROCESSES

### Policy Statement:

The City of Dauphin's return to work policy 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 accommodations to return to work.

The City of Dauphin's return to work policy 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.

The City of Dauphin recognizes that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions, and we accommodate affected employees.

### Practices:

- We keep in touch with absent employees and the Workers Compensation Board of Manitoba (WCB) (where involved) throughout the employees' recovery to help them maintain a connection with their workplace and to show they are valued.
- 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 beneficial to our organization and outline the expectations for supporting an employee in a modified role.
- We follow WCB's return to work process.

## 9. WORKPLACE EMERGENCY RESPONSE INFORMATION

### Policy Statement:

The City of Dauphin ensures all employees are aware of steps to be taken during emergencies to secure 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.

**Practices:**

- We annually send a memo to all employees to inquire whether they need assistance during an emergency and to remind them of the building's emergency plan.
- If an employee identifies that they require assistance during a workplace emergency, we offer the employee individual emergency response information as soon as possible.
- 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.
- 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.
- We regularly discuss general accessibility and identify barriers during Workplace Safety and Health meetings.
- In a situation where an employee has difficulty exiting the building during an evacuation, with permission from the employee we identify someone to remain with this person and assist them to exit safely.
- The City Manager, or designate, who acts as fire marshal, ensures communication with the affected employee and notifies the fire department about the number and location of any employees who might remain in the building.

## 10. PRIVACY

**Policy Statement:**

The City of Dauphin protects the privacy and confidentiality of employees' 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 organizations, including *The Freedom of Information and Protection of Privacy Act* (FIPPA) and *The Personal Health Information Act* (PHIA).

**Practices:**

- We protect our employees' confidential personal information and personal health information at all times by taking the following steps:
  - Ensuring personal employee information is filed in a locked filing cabinet accessible to only a few authorized staff members.
  - Ensuring any staff privy to personal employee information are bound by the terms of a signed Statement of Confidentiality.



### 11. TRAINING

#### Policy Statement:

The City of Dauphin ensures supervisors and managers with the following responsibilities are provided with training on how to accommodate employees with a disability:

- 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

#### Practices:

- We train new employees and management as soon as reasonably possible, and no later than one month after hiring, and ensure training content includes, as applicable:
  - 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*, The Human Rights Code (Manitoba), and the Accessible Employment Standard.
  - The City of Dauphin's accessible employment policies and practices, including updates or changes.
- We provide refresher training regularly, including informing staff about updates to policies and practices. Training is offered every year and as needed, following updates.
- Supervisors will maintain records of who has taken training and when.

### 12. RECORD-KEEPING

#### Policy Statement:

The City of Dauphin keeps a written record of our accessibility and training policies. 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.

#### Practices:

- We keep a record of the City of Dauphin's accessibility and training policies, a list of dates when training is offered, a summary of the training content offered, and staff who received the training.
- We advise the public that our accessibility and training policies are available in the following ways:
  - Posting on our City of Dauphin website.
  - Posting in the City Hall entrance vestibule.
- 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.



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