

	<b>MUNICIPALITY OF RHINELAND</b>	<b>POLICY NO. 2022-053</b>
	<b>ADOPTED BY:</b>	<b>Last Updated: April 2022</b>
	<b>DATE: April 6 2022</b>	<b>Page: 1 of 8</b>
	<b>TITLE: Accessibility Employment Policy</b>	<b>Department: All</b>

**PURPOSE:** The purpose of this policy is to ensure our policies, practices and measures reflect principles of dignity, independence, integration and equal opportunity for people with disabilities.

**POLICY STATEMENT:** The Municipality of Rhineland is committed to complying with the Accessibility Standard for Employment under the accessibility for Manitobans Act. The Municipality of Rhineland aims to remove barriers in our workplace. If a barrier cannot be removed, The Municipality of Rhineland will seek to provide reasonable accommodations to affected employees. This policy applies to all management, human resources, council and employees of the Municipality.

**GUIDING POLICIES:**

**Pre-employment Accessibility Requirements**

**1: Remove barriers to recruitment and selection.**

During recruitment, The Municipality of Rhineland will inform potential applicants that reasonable accommodations are available during the selection process's, and will respond to requests for accommodations to the best of their ability.

**Practices and Measures:**

- Where able, include a statement on job postings that reasonable accommodations are available to applicants with disabilities
- When an applicant has made a request for an accommodation during the selection process, The Municipality of Rhineland will:
  - Consult with the applicant to determine the appropriate accommodation.
  - Put the appropriate accommodation in place during the assessment process.

## **2: Workplace accommodations when offering employment.**

The Municipality of Rhineland will inform selected applicants of our measures, policies and practices for accommodating employees with disabilities.

### **Practices and Measures:**

- The Municipality of Rhineland will include information about workplace accommodations in the letter of offer to new employees if applicable.
- The Municipality of Rhineland will include the Accessibility Employment Policy and review workplace accommodations in new employee orientation materials.

## **3: Inform employees about accommodation policies and practices.**

The Municipality of Rhineland will keep employees informed about our accommodation measures, policies and practices for employees with disabilities. The Municipality of Rhineland will also provide updates to affected employees when this policy changes.

### **Practices and Measures:**

- The Municipality of Rhineland may provide information to employees about our policies for employees with disabilities and any updates in multiple formats such as:
  - Orientation packages
  - Discussions with management (in person, phone, video conference or through email)

## **4: Communicate in a way that meets employees' needs.**

The Municipality of Rhineland aims to meet the communication needs 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, The Municipality of Rhineland:

- Will 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.

**Practices and Measures:**

- To meet an employee’s communication needs, employees will be asked what accessible format or communication support is most appropriate for them.
- The Municipality of Rhineland will provide information to employees in multiple ways to meet everyone’s needs.

**5: Provide individualized accommodation plans.**

Our policy is to provide reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities upon request.

**Practices and Measures:**

The individualized accommodation plan could include if requested;

- accessible formats and communication support
- workplace emergency response information
- details of how and when any other accommodations 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 assessments, if requested by the employer/employee
- complying with the individualized accommodation plan
- offering ongoing feedback related to modifications

Supervisors will also review an employee’s individualized accommodation plan after 3 months and in combination of regular annual review or upon request.

**A. Accessible formats**

The Municipality of Rhineland will 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 meets the needs of the employee.

## **B. Reasons for denying a request**

The Municipality of Rhineland may deny an employee's request for an individualized accommodation plan in the following circumstances:

- a. The employee is able to carry out most of the job without an accommodation.
- b. The independent regulated health professional(s) does not support the employee's self-assessed requirement for a workplace accommodation.
- c. Our 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).

## **C. Maintaining Privacy**

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

## **6. Manage performance.**

The Municipality of Rhineland will ensure 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 and Measures:**

- The Municipality of Rhineland will meet with new staff after three months and annually or upon request to discuss progress, new goals and any challenges.
- The Municipality of Rhineland will speak with employees when they do not follow company policy or meet expectations, and may offer a spoken and/or written warning of consequences, including disciplinary action.
- The Municipality of Rhineland will discuss existing workplace accommodations and propose modifications or new workplace

accommodations if The Municipality of Rhineland believes this could help improve the performance of an employee with a disability.

- Prior to imposing disciplinary measures, The Municipality of Rhineland should consider whether there is a connection between concerns about job performance and workplace barriers.

### **7. Provide career development, training, internal advancement and reassignment.**

When providing career development, training or opportunities for internal advancement or reassignment, Rhineland will 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 and measures aim to ensure that workplace accommodations do not negatively affect access to career development.

#### **Practices and Measures:**

- The Municipality of Rhineland will 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, review to ensure that it is adequate to address any barriers presented by the new opportunity, or modify the plan accordingly.
- Our training program and methods for career development are accessible to all employees. If a barrier is identified, we will attempt to remove or reduce it.

### **8. Return to work processes.**

Our commitment is to provide 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.

To ensure reasonable accommodations for employees who are at work or absent due to a disability or health condition, 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.

**Practices and Measures:**

- The Municipality of Rhineland will keep in touch with absent employees and the [Workers Compensation Board of Manitoba \(WCB\)](#) (where involved) throughout the employees' recovery to help maintain a connection.
- The Municipality of Rhineland offers meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities.
- The Municipality of Rhineland will ensure supervisors and co-workers support employees who have been absent due to a disability, and participate in the return-to-work process.
- The Municipality of Rhineland will educate staff on why returning to work is good for business and outline the expectations for supporting an employee in a modified role.
- The Municipality of Rhineland will follow WCB's return to work process.
- The Municipality of Rhineland will recognize that pandemics, pose serious health threats to people with pre-existing conditions, and attempt to accommodate affected employees.

**9. Provide workplace emergency response information.**

The Municipality of Rhineland will notify all employees of steps to be taken during emergencies, to ensure the safety of employees who are temporarily or permanently disabled. The Municipality of Rhineland ensures [workplace emergency response information](#) is specific to each employee's needs.

Once The Municipality learns an employee requires assistance during a workplace emergency, they will offer the employee individual workplace emergency response information.

The Municipality of Rhineland will review the workplace emergency response information provided to an employee each time:

- the employee's workspace is modified/moved
- The Municipality of Rhineland may review our general emergency response plans at any time or upon request.

If an employee who receives workplace emergency response information requires the assistance of another person during an emergency, The Municipality of

Rhineland will obtain consent from the employee who will assist, and review with that person how to assist.

**Practices and Measures:**

- Each new employee must file a emergency plan with their supervisor for whether they need assistance during an emergency and to remind them of the office or building's emergency plan.
- Regular discuss general accessibility and identify barriers during Workplace Safety and Health meetings.
- In a situation where an employee cannot descend the stairs to exit the building during an evacuation, with permission from the employee, The Municipality will identify someone to remain with this person in the (designated safe area).
- Add any other practices and measures that are specific to your organization.

**10. Maintain privacy.**

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

The Municipality of Rhineland also follows the requirements of other privacy legislation, including [The Freedom of Information and Protection of Privacy Act](#) (Manitoba) and [The Personal Health Information Act](#) (Manitoba).

**11: Provide training**

The Municipality of Rhineland will provide 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

Training content may include:

- 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
- our organization's accessibility policy, code of conduct policy, employment policies, etc.

**Practices and Measures:**

- Train new employees and management as soon as reasonably possible, and no later than one month after hiring.
- Inform staff about updates to policies, practices and measures. Training can be requested, as needed, following updates.
- Human Resources will maintain records of who has taken training.

**12: Keep record of accessibility and training policies.**

The Municipality of Rhineland will keep a record of our accessibility policies. Our documents include a summary of the content of our training material.

The Municipality of Rhineland will provide to the public policies are available upon request and provide in a format that is accessible for the user.

**Practices and Measures:**

- Provide accessibility and training policies upon request:
  - Post on The Municipality of Rhineland website
  - Through management (in person, by phone, video or email communications)
- The Municipality of Rhineland will provide our policies within a reasonable timeframe, and in a format that meets the needs of individuals with a disability, at no additional cost.