

	<b>TOWN OF CARMAN</b>	<b>POLICY NO. 008</b>
	<b>ADOPTED BY: Resolution:005/24</b>	<b>Last Updated: Jan 2024</b>
	<b>DATE: January 2<sup>nd</sup> 2024</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:** Town of Carman & RM of Dufferin have developed the polices, organization practices and measures outlined in this document to meet the requirements of The Accessible Employment Standard Regulation. 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 will work collaboratively with the affected employee(s) to provide reasonable accommodation.

This policy applies to all departments in our organization.

**Pre-employment Accessibility Requirements**

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

During recruitment, The Town of Carman 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 Town of Carman 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 Town of Carman will inform selected applicants of our measures, policies and practices for accommodating employees with disabilities.

**Practices and Measures:**

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

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

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

**Practices and Measures:**

- The Town of Carman may provide information to employees about our policies for employees with disabilities and any updates in multiple formats such as:
  - Orientation packages
  - Posted on the internet, public website, memo's, or through staff emails
  - Posted in the staff room or in high traffic areas
  - During staff meetings
  - Discussions with management (in person, phone, video conference or through email)

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

The Town of Carman 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 Town of Carman:

- 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 Town of Carman 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 that is mutually satisfactory.

**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, including whether the accommodation is no longer required

CAO's or Supervisors will also review an employee's individualized accommodation plan after 3 months and in combination of regular annual review or upon request when;

- The employee's workplace is modified or relocated
- The employee's responsibilities have changed
- Other workplace changes have occurred that affect the accommodation
- The employee has made a request to review and update the accommodation plan

**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.

**Assistance for the employee in the developing the plan**

An employee may request assistance with developing the plan, including an individual or organization with knowledge of workplace accommodations for employees with disabilities.

**Accessible formats**

The Town of Carman 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 meet the needs of the employee.

### **Reasons for denying a request**

The Town of Carman 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).

### **Maintaining Privacy**

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

### **6. Manage performance.**

The Town of Carman 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 Town of Carman will meet with new staff after three months and annually or upon request to discuss progress, new goals and any challenges.
- The Town of Carman 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 Town of Carman will discuss existing workplace accommodations and propose modifications or new workplace accommodations if The Town of Carman believes this could help improve the performance of an employee with a disability.

- Prior to imposing disciplinary measures, The Town of Carman 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, Carman 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 Town of Carman 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.**

A return-to-work process is a proactive way to help employees with disabilities and health conditions to stay at work or return to work as soon as it is safe to do so. This typically involves modifying and graduating employee duties and hours at work, according to their functional abilities.

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

- We keep in touch with absent employees, the Workers Compensation Board of Manitoba (WCB) (where involved), and Long-Term Disability (where involved) throughout the employees' recovery to help them maintain a connection with their workplace.
- 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, recognizing and balancing the requirements of the workplace and the job requirements.
- 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, while ensuring privacy for the affected employee.
- We follow WCB's and the Long-Term Disability Plan's return to work processes.
- We recognize that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions, and we accommodate affected employees.

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

- 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 regularly discuss general accessibility and identify barriers during Workplace Safety and Health meetings.
- We provide workplace emergency response information to all new employees and invite them to inform their CAO's or supervisor of assistance required in an emergency. We also request emergency contact information and keep this information up to date.
- We ensure workplace emergency response information is specific to each employee's needs and the physical nature of the employee's workplace.
- We review the emergency response information provided to an employee requiring assistance any time the employee is moved to a different workplace, the workplace is modified and if a change is made to general emergency response plans.
- 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.

**Practices and Measures:**

- In a situation where an employee cannot descend the stairs to exit the building during an evacuation, with permission from the employee, we identify someone to remain with this person in the (designated safe area).
- The fire marshal for the floor on which the employee is located during the emergency ensures communication with these employees during the

emergency by cell phone. The person acting as fire marshal notifies the fire department about the number and location of employees who remain in the building.

#### **10. Maintain privacy.**

The Town will protect the privacy and confidentiality of employee's personal information and personal health information. The Town 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 Town of Carman 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 Town of Carman 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
- developing and implementing employment policies and practices
- We train new employees and management as soon as reasonably possible.
- 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*, *The Human Rights Code*, and *The Accessible Employment Standard* through the online training of Accessibility Standard for Customer Services.
  - Our organization's accessible employment policies, practices, and measures, including updates or changes.
  - We provide refresher training regularly, including informing staff about updates to policies, practices and measures. Training is offered as needed, following updates.
  - CAO's and supervisors maintain records of who has taken training and when.

#### **Keep a written record of accessibility and training policies.**

- We keep a written record of our accessibility and training policies, including a summary of the content of our training material.

- 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.

Date of next policy review: \_\_\_\_\_

Approved by: \_\_\_\_\_

Position: \_\_\_\_\_

The document is available in alternate formats, upon request.

For more information, contact:

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Phone: 204-745-2443  
[info@townofcarman.com](mailto:info@townofcarman.com)

RM of Dufferin  
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Carman, MB R0G 0J0  
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[info@rmofdufferin.com](mailto:info@rmofdufferin.com)

**REVIEW AND APPROVAL**

This Policy has been reviewed and approved by

\_\_\_\_\_ on \_\_\_\_\_ 2024  
Mayor – Town of Carman

\_\_\_\_\_ on \_\_\_\_\_ 2024  
CAO - Town of Carman

\_\_\_\_\_ on \_\_\_\_\_ 2024  
Reeve – R.M. of Dufferin

\_\_\_\_\_ on \_\_\_\_\_ 2024  
CAO – R.M. of Dufferin



**Express Consent Form – Accessible Employment Policy – Acknowledgment of Understanding**

*This document is an express consent form for the collection, use and disclosure of Accessible Accommodation required in relation to Accessible Employment Accommodation. By agreeing with this Consent, you are giving permission for the Town of Carman/RM of Dufferin to collect, use and disclose your personal information as described above for the following purposes:*

- *to take all reasonable precautions for the health and safety of Town of Carman/RM of Dufferin Employees, and others in the workplace;*
- *to make decisions about workplace staffing and modifications;*
- *to provide limited disclosure for emergency response procedures in the workplace.*

*Personal information will be kept in a separate file maintained by the respective CAO and appropriate safeguards will be taken. It will be accessed only on a need-to-know basis by CAO’s and supervisor, solely for the purposes outlined above.*

*Your information is being collected, used and disclosed pursuant to the Town of Carman/RM of Dufferin’s Accessible Employment Policy and in accordance with all privacy legislation requirements. The information will only be retained for the duration necessary.*

**Express consent**

I hereby agree and consent that the Town of Carman/RM of Dufferin may collect, use and disclose my Accessible Employment Accommodation information for the purpose of the Policy as described above.

\_\_\_\_\_  
Signature                      First Name                      Last Name                      Date

**Acknowledgment of Understanding**

I hereby acknowledge that I have read, been informed about the content, requirements and expectations of the Accessible Employment Policy for Employees of Town of Carman/RM of Dufferin. I have received a copy of the policy and agree to abide to the Policy guidelines as a condition of my employment. If accommodation is needed to fulfill the requirements of this Policy, I will advise my respective CAO.

\_\_\_\_\_  
Signature                      First Name                      Last Name                      Date