



Co-op Accessible Employment

Procedure: Manitoba

Purpose

The purpose of this Co-op Accessible Employment Procedure (“Procedure”) is to detail the roles/ responsibilities and necessary steps required for implementation of the Co-op Accessible Employment Policy (the “Policy”).

Application

This Policy and Procedure apply to all employees, including permanent full-time, part-time, temporary, and casual employees, agents and/or contractors, and volunteers including those that act on behalf of Co-op.

1.0 Introduction

This Co-op Accessible Employment Procedure (“Procedure”) supports the implementation of the Co-op Accessible Employment Policy (the “Policy”). Co-op is committed to complying with the Accessibility Standard for Employment under *The Accessibility for Manitobans Act*.

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

2.0 Procedure

Pre-employment Accessibility Requirements:

Remove barriers to recruitment and selection

During recruitment, we inform 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 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.

Mention workplace accommodations when offering employment

When hiring, we inform selected applicants of our measures, policies and practices for accommodating employees with disabilities.

- We include information about workplace accommodations in our new employee orientation materials.

Employment Accessibility Requirements:

Inform employees about accommodation policies and practices

We keep employees informed about our accommodation measures, policies and practices for employees with disabilities. We also provide updates to employees when this information changes in multiple ways including in the work place, posting in our internal site and on our website and /or through email or other exchanges.

Communicate in a way that meets employees' needs

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.

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.

Additionally,

- To meet an employee's communication needs, we ask the employee what accessible format or communication support is most appropriate for them.
- We provide information to employees in multiple ways to meet everyone's needs, including posting information on our bulletin boards, posters, memos, or through employee emails in accessible formats.

Manage performance & provide career development

We ensure our performance management and career development processes take 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; and
- that the accommodations provided for an employee may not fully address a workplace barrier.

In addition,

- We meet with new employees six (6) 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 and any assistance required during emergencies.
- We speak with employees when they do not follow company policy 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.

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

- 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.

Provide workplace emergency response information

We notify all employees of 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 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; or
- 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.

3.0 Policies

Individualized Accommodation Plan (IAP) Policy:

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

An individualized accommodation plan includes:

- accessible formats and communication supports;
- workplace emergency response information; and
- details of how and when any other accommodations will be provided.

Requirements

The following policy requirements apply:

- We support employees by providing reasonable accommodations in the workplace. Employees may make a verbal or written request to their [manager, supervisor or other human resources representative] for an individualized accommodation plan.
- 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.
- An employee may request assistance with developing the plan, including:
 - assistance from a representative of the bargaining agent (union) if applicable, or another person who is knowledgeable about workplace accommodations for



employees with disabilities.

- We will review the individualized accommodation plan on the three-month anniversary date and in combination with regular annual employee reviews, or earlier on the employee's request.
- We provide a copy of an individualized accommodation plan to an employee, in an accessible form, on request of the employee.
- 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(s) does not support the employee's self-assessed requirement for a workplace accommodation.
 - Co-op's 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).
- In the event a request for an individualized accommodation plan is denied, we will provide the employee with written reasons for why their request was denied.
- Co-op maintains employee privacy regarding accommodation plans and personal health information by the following practices:
 - Co-op only collects, uses, and discloses information as required for the purposes of the Accessibility Standard for Employment, unless otherwise agreed to by the employee.
 - We follow proper protocol when storing confidential employee information.

Confidentiality of employees' information

We take appropriate steps to protect the confidentiality of our employees' personal information and personal health information. Co-op employees will participate and cooperate in the accommodation process by:

- providing relevant information and taking part in assessments/evaluations, if requested for the individualized accommodation plan;
- complying with the accommodation plan and participating in and cooperating with accommodation efforts; and
- offering ongoing feedback related to modifications, including whether the accommodation is no longer required.



Team leaders

Team leaders will review an employee's individualized accommodation plan, and update if required, when:

- the employee's workspace is modified or relocated;
- the employee's responsibilities have changed; and
- when Co-op becomes aware that there are other changes that impact the accommodation required.

Return to Work Policy:

Our 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 process we will follow in determining the accommodations necessary to facilitate the return to work of employees who have been absent due to a disability or health condition is as follows:

- We keep in touch with absent employees and the Workers Compensation Board of Manitoba (WCB) (where involved) throughout an employee's 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 good for business and outline the expectations for supporting an employee in a modified role.
- We follow WCB's return to work process.

Accommodation Training Policy:

We provide training on how to accommodate employees with a disability to employees with the following responsibilities:

- recruiting, selecting or training employees,
- supervising, managing or coordinating the work of employees,
- promoting, redeploying or terminating employees, and
- 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*, *The Human Rights Code* (Manitoba), and the Accessible Employment Standard
- Co-op's accessible employment policies, practices and measures, including updates or changes

We train new employees and management as soon as reasonably possible, and no later than **one to two months** after hiring.

- We provide ongoing training about updates and changes to policies, practices and measures as needed.
- Team leaders and/or Human Resources 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. Our written documents include a summary of the content of our training material and a list of dates when training is offered.