



ACCESSIBLE EMPLOYMENT POLICY

Booth University College (BoothUC) is committed to complying with the Accessibility Standard for Employment under The Accessibility for Manitobans Act. Our policies, practices and measures reflect principles of dignity, independence, integration, and equal opportunity for people with disabilities.

At Booth University College 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, organizational practices and measures are intended to meet the requirements of Manitoba's Accessibility Standard for Employment.

1.0 SCOPE

This Accessible Employment policy applies to all Booth University College employees.

2.0 PRE-EMPLOYMENT ACCESSIBILITY REQUIREMENTS

2.10 Remove barriers to recruitment and selection

POLICY:

In the recruitment cycle Booth University College informs potential applicants that reasonable accommodations are available during the selection process, and we respond to requests for accommodations.

PROCEDURE:

- 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.



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2.20 Mention workplace accommodations when offering employment.

POLICY:

When hiring, Booth University College informs selected applicants of our measures, policies, and practices for accommodating employees with disabilities.

PROCEDURE:

- 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.

3.0 Employment Accessibility Requirements

3.10 Inform employees about accommodation policies and practices

POLICY:

BoothUC keeps employees informed about accommodation measures, policies, and practices for employees with disabilities to ensure they understand their right to accommodation and provides updates to employees when information changes occur.

PROCEDURE:

Information is made accessible to all employees about our policies for employees with disabilities and any updates through:

- Communications internally (intranet, staff/faculty emails, posters, brochures)
- Postings on bulletin boards in high traffic areas
- Discussions with management (in person, by phone or through email)
- During staff/faculty meetings



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3.20 Communicate in a way that meets employees' needs.

POLICY:

BoothUC aims 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.

PROCEDURE:

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 individual needs, such as posting information on our bulletin boards and circulating information electronically by email in accessible formats.

When deciding on the most appropriate accessible formats for an employee, if needed an external accessibility expert may be attained.

3.30 Provide individualized accommodation plans.

POLICY:

Booth University College's Accommodation Process provides reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities who request them.

PROCEDURE:

The individualized accommodation plan includes:

- Accessible formats and communication supports, if requested
- Workplace emergency response information, if required



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- 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 BoothUC
- Complying with the individualized accommodation plan
- Offering ongoing feedback related to modifications, including whether the accommodation is no longer required

Managers/Supervisors will review the accommodation plan regularly and as required based on the individual employee's circumstances and in combination with regular annual employee reviews and one on one meetings.

Managers/Supervisors will also 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
- Other workplace changes have occurred that affect the accommodation
- The employee has made a request to review and update the accommodation plan

4.0 Request for an individualized accommodation plan

Booth University College is committed to providing a work environment that supports employees by providing reasonable accommodation in the workplace. Employees will make a verbal request or provide a written request to their manager, supervisor, or Human Resources for an individualized accommodation plan. Our Accommodation Process documents this practice.

4.10 Assessment of employee and accommodation required

The employee's accommodation request will be reviewed, and possible accommodations options will be assessed on an individual basis.

Employees may be requested to provide documentation from a health practitioner to support the need for the accommodation.



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BoothUC may require 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.

4.20 Assistance for the employee in developing the accommodation plan

An employee may request assistance from a manager or supervisor with developing the plan, or assistance from the Human Resource about workplace accommodations for employees with disabilities.

Accessible formats

BoothUC meets 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 method which would meet the needs of the employee.

4.30 Reasons for denying a request

BoothUC 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.
- Our 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)

4.40 Maintaining Privacy

BoothUC is committed to maintaining employee privacy regarding accommodation plans and personal health information by following the practices outlined in 9 Maintain Privacy below.

5.0 Manage performance

POLICY:

BoothUC ensures our performance management process takes into account:



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- 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

PROCEDURE:

- Managers or supervisors meet with new employees within 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 and any assistance required during emergencies.
- Managers or supervisors speak with employees when they do not follow BoothUC policy or meet expectations, and offer a verbal and written warning of consequences, including disciplinary action.
- Managers or supervisors discuss existing workplace accommodations and propose modifications or new workplace accommodations if there is a cause to believe this could help improve the performance of an employee with a disability.
- Prior to imposing disciplinary measures, managers or supervisors consider whether there is a connection between concerns about job performance and workplace barriers.

6.0 Provide career development, training, internal advancement and reassignment.

POLICY:

In any career development, training and opportunities for internal advancement or reassignment, BoothUC is committed to ensuring 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



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

PROCEDURE:

- We recruit and select candidates based on objective criteria, such as current training, job experience, and skills
- 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 opportunities for career development are accessible to all employees. If a barrier is identified, we attempt to remove or reduce it.

7.0 Put return to work processes in place

POLICY:

BoothUC utilizes The Salvation Army's return-to-work process which 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.

We include a description of 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.

The return to work policy ensures reasonable accommodations for employees who are at work or absent due to a disability or health condition. We 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.

PROCEDURE:

- Human Resources and the manager or supervisor keeps 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.
- The Manager or supervisor will offer meaningful and productive modified or alternate duties that are safe and within the employee's functional abilities and will be flexible to tailor the return to work plan to the employee's needs.



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- Managers, supervisors and co-workers support employees (while respecting privacy) who have been absent due to a disability and participate in the return to work process. Employees are educated on why returning to work is good for BoothUC and the expectations for supporting an employee in a modified role
- WCB's return to work process is followed.

We recognize that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions, and we accommodate affected employees.

8.0 Provide workplace emergency response information.

POLICY:

BoothUC notifies 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.

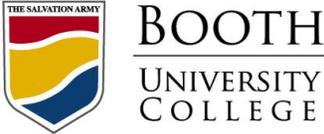
We review the workplace emergency response information provided to an employee each time:

- the employee is moved to a different workspace
- the employee's workspace is modified
- we review our emergency preparedness plan 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 indicates through their workplace emergency response information that they (Emergency Preparedness Plan (EPP) questionnaire) require 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.

PROCEDURE:

- Annually we send an email to all employees to inquire whether they need assistance during an emergency and to remind them of the office or building's emergency plan.



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- We regularly discuss general accessibility and identify barriers during Accessibility Committee meetings and Safety Committee meetings
- 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 name of the employee who requires assistance is provided to the fire department in the fire panel box located in the foyer.
- The designated employee who acts as fire marshal, ensures communication with these employees during the emergency as documented in the Emergency Preparedness Plan
- The acting fire marshalls notify the fire department about the number and location of employees who remain in the building.

9.0 Maintain privacy

POLICY:

BoothUC protects the privacy and confidentiality of employee's 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 legislation, including the Personal Information Protection and Electronic Documents Act (PIPEDA) and The Personal Health Information Act (PHIA).

PROCEDURE:

- We follow proper protocol when storing confidential employee information.
- We protect our employees' personal information and personal health information at all times by taking the following steps
 - locking the personnel filing cabinet
 - limiting access of employee personnel record to human resources only
 - having password protected electronic files and drives

Information related to supporting an accommodation may be requested by Managers or supervisors.



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10.0 Provide training

POLICY:

Booth University College provides 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

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
- BoothUC's accessible employment policies, practices and measures, including updates or changes

PROCEDURE:

- We train new employees and management as soon as reasonably possible, and no later than three (3) months after hiring.
- At our annual staff and faculty meeting we review accessibility policies. We provide refresher training regularly, including informing employees about updates to policies, practices, and measures. Training is offered throughout the year, and as needed, following updates.
- Human Resources maintains a documented list of who has taken training and when.



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11.0 Keep a written record of accessibility and training policies.

POLICY:

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. We advise the public that our policies are available upon request and we provide these in a format that is accessible for the user.

PROCEDURE:

We will let the public know that our accessibility and training policies are available in the following ways:

- Posted on Booth University College website
- Included in posters, brochures, advertisements.
- Through employees and management

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.