



**Manitoba  
Public Insurance**

## **Accessible Employment Policy**

Policy Reviewed By:	Revision Date: September 10, 2021
<ul style="list-style-type: none"><li>• Accessibility Working Committee</li><li>• Executive Committee</li><li>• Corporate Champion</li></ul>	Effective Date: September 28, 2021

# Accessible Employment Policy

---

1.	Purpose .....	1
2.	Background.....	1
3.	Resources .....	1
4.	Definitions.....	1
5.	Responsibility .....	2
6.	Scope .....	2
7.	Policy.....	3
7.1	General.....	3
7.2	Reasonable accommodation .....	3
7.3	Remove barriers to staffing .....	4
7.4	Inform employees about accommodation policies and practices .....	4
7.5	Communication of information.....	4
7.6	Provide Individualized Accommodation Plans (IAP)s.....	4
7.7	Provide Workplace Emergency Response Plans.....	6
7.8	Performance Management .....	7
7.9	Provide opportunities for internal advancement or reassignment .....	7
7.10	Return to Work Process .....	7
7.11	Provide training .....	8
7.12	Maintain Privacy .....	8



# Accessible Employment Policy

---

## 1. Purpose

To provide guidance on removing workplace barriers and providing reasonable accommodations for Manitoba Public Insurance employees.

## 2. Background

This Accessible Employment Policy is intended to meet the requirements of the Accessible Employment Standard Regulation (M.R. 70/2019) under *The Accessibility for Manitobans Act (AMA)* (C.C.S.M. c. A1.7).

## 3. Resources

- [\*The Accessibility for Manitobans Act \(AMA\)\*](#)
- [\*Accessible Employment Standard Regulation\*](#)
- [\*Manitoba Public Insurance Corporation's Accessibility site\*](#)

## 4. Definitions

When interpreting this policy, the following definitions apply:

*Accessible Format* - means a format of information that is used to facilitate effective communication by or with a person disabled by a barrier, and includes large print, recorded audio, electronic formats, braille and others.

*Accommodation* - is an adjustment that an employer makes to working conditions, duties, policies, rules, practices, programs or the physical work environment to address the work-related needs of prospective or current employees who are disabled by barriers.

*Barrier* - for a person who has a physical, mental, intellectual or sensory disability, a barrier is anything that interacts with that disability in a way that may hinder the person's full and effective participation in society on an equal basis.

*Communication Support* - means a corporately owned and deployed support or assistive device used to facilitate effective communication by or with a person disabled by a barrier, and includes sign language interpreters, captioning, and augmentative and alternative communication supports amongst others.

*Performance Management Processes* - mean any processes used by an employer to manage the work of individual employees or to plan, monitor and review an employee's overall contribution to the organization.



## **Accessible Employment Policy**

---

*Personal Information* - means recorded information about an individual. Non-exhaustive examples include the individual's name, home address, telephone, e-mail, age, marital status, health, criminal history, education and any other identifying number or symbol assigned to the individual.

*Personal Health Information* - includes information about an identifiable individual that relates to the individual's health or health care history, the provision of or payment for health care to the individual, and any other identifying number assigned to an individual collected in the course of providing health care.

### **5. Responsibility**

*Manitoba Public Insurance shall:*

- 5.1 Ensure that all persons within the scope of this policy are informed of their responsibilities related to the AMA.
- 5.2 Monitor and enforce the terms of this policy and escalate breaches accordingly.
- 5.3 Provide advice, guidance and assistance to management throughout the process, and inform management of their responsibilities.
- 5.4 Welcome feedback from applicants and employees regarding any feedback within the scope of this policy.

*Employees and prospective employees shall:*

- 5.5 Ensure they are responsible for adhering to the expectations outlined in this policy.
- 5.6 Participate and cooperate in all areas within the scope of this policy, including but not limited to:
  - provide related information and take part in assessments, if requested by Manitoba Public Insurance;
  - comply with plans, provide updates and offer ongoing feedback throughout any process.

### **6. Scope**

This *Accessible Employment Policy* applies to all job applicants and current employees of Manitoba Public Insurance.

# Accessible Employment Policy

---

## 7. Policy

### 7.1 General

Manitoba Public Insurance is committed to complying with The Accessible Employment Standard under *The AMA*, and recognizes that individuals with disabilities may face barriers that prevent them from full and effective participation in the workplace.

The Corporation's employment policies are consistent with the principles of dignity, independence, access, integration, and equal opportunity for people with disabilities.

Manitoba Public Insurance's actions will be consistent with the purposes and principles of the Act and its obligations including the obligation to make reasonable accommodations under The Human Rights Code.

### 7.2 Reasonable accommodation

Manitoba Public Insurance will:

- (a) provide **reasonable accommodation** to job applicants and employees who are disabled by barriers.

An accommodation is reasonable if it does not result in undue hardship to Manitoba Public Insurance and:

- is required for an applicant to fully participate in the recruitment, selection and assessment process; or
- is required for an employee to perform their job and access benefits available to them.

For an accommodation to constitute undue hardship, Manitoba Public Insurance must demonstrate that there are no further reasonable or practical steps available to reduce negative impacts for an applicant or employee based on the disability or barriers.

While accommodation is primarily the responsibility of Manitoba Public Insurance, all relevant parties must participate in the accommodation process. The accommodation process does not guarantee parties their preferred type of accommodation.

Manitoba Public Insurance will inform job applicants and employees, in writing, when their requests for accommodation have been denied.

## **Accessible Employment Policy**

---

### **7.3 Remove barriers to staffing**

Manitoba Public Insurance will inform applicants that reasonable accommodations are available upon request in respect of the staffing process.

If an applicant requests an accommodation, Manitoba Public Insurance will consult with the applicant to determine how to reasonably accommodate the applicant.

When making an offer of employment, Manitoba Public Insurance will include information about its policies and practices for accommodating employees in the workplace.

### **7.4 Inform employees about accommodation policies and practices**

Manitoba Public Insurance will inform employees about its policies and practices for accommodating employees disabled by barriers, and update employees when these policies or practices change.

Any changes to this policy will be communicated by email and on the internet.

### **7.5 Communication of information**

Manitoba Public Insurance will provide information to employees in accessible formats and/or with communication support and will make all reasonable efforts to communicate with employees disabled by barriers in an appropriate manner that takes those barriers into account.

Employees disabled by barriers may request that Manitoba Public Insurance communicate with them using an accessible format and/or communication support. Employees should submit these requests either verbally or in writing to their direct leaders, who will consult with the employee to determine what type of accessible format or communication support is necessary.

### **7.6 Provide Individualized Accommodation Plans (IAP)s**

Manitoba Public Insurance will develop and implement Individualized Accommodation Plans (IAPs) for employees upon request.

## **Accessible Employment Policy**

---

### **(a) Contents and documentation of an IAP**

- any accessible formats and communication supports Manitoba Public Insurance will use in providing information to the employee;
- Persons Requiring Assistance Plan (PRA) developed;
- any other reasonable accommodation Manitoba Public Insurance will make, including the manner and timing of the accommodation.

### **(b) Request for Accommodation and Assessment of Accommodation Needs**

An employee must, in good faith, cooperate in the establishment and implementation of their IAP. Employees should submit their requests for accommodation to their direct leaders.

Once a request for accommodation has been received, Manitoba Public Insurance will assess the employee's accommodation needs on an individual basis.

Employees may be required to provide Manitoba Public Insurance with documentation from a health practitioner who supports the need for accommodation. They may also be required to undergo an evaluation by an independent regulated health practitioner or other practitioner in the area of work place accommodations for employees with disabilities. Where Manitoba Public Insurance requests an independent evaluation, Manitoba Public Insurance will cover the costs of the assessment.

### **(c) Developing and Implementing an IAP**

Manitoba Public Insurance will work with management, employees, and other relevant parties to create and execute IAPs that are tailored to employees' individual needs and circumstances.

Employees may request assistance in the development of IAPs, including assistance from a person who is knowledgeable in the area of workplace accommodations for persons disabled by barriers.

## Accessible Employment Policy

---

### (d) Denying a Request for an IAP

When Manitoba Public Insurance makes the decision to deny an employee's request for an IAP, it will provide the employee with written reasons for its decision.

### (e) IAP Reviews

Formal reviews of an employee's IAP will take place as scheduled in the plan. A formal review will also be initiated if the employee's workspace is modified or relocated, if the employee's responsibilities change, or the employee makes a request to review and update the plan.

## 7.7 Provide Workplace Emergency Response Plans

When Manitoba Public Insurance becomes aware that an employee who is disabled by barriers may require assistance in a workplace emergency, Manitoba Public Insurance will develop a PRA for them. The PRA will contain information on how the employee should respond to a workplace emergency, and the steps Manitoba Public Insurance will take to assist them.

Workplace Safety is primarily responsible for maintaining PRAs, while management is primarily responsible for creating PRAs with the assistance of employees. PRAs will be filed in a secure location.

Employees who face special risks or challenges in responding to workplace emergencies as a result of accessibility barriers should request a PRA by completing an Employee Emergency Response Questionnaire.

If an employee requires assistance of another person in the event of a workplace emergency, Manitoba Public Insurance may, with the employee's consent, provide information in the PRA to the person designated to assist them ("buddy"). Manitoba Public Insurance may also provide the information to designated Manitoba Public Insurance safety personnel with consent.

Similar to the IAPs, PRAs will be reviewed by Manitoba Public Insurance each time the employee is moved to a different workspace, their workspace is modified, there is a change to location of the employee's buddy, or Manitoba Public Insurance reviews and changes its general emergency response plans.





## Accessible Employment Policy

---

### 7.8 Performance Management

Manitoba Public Insurance will ensure its performance management processes take into account:

- that employees may be disabled by one or more barriers in the workplace;
- the employee's IAP (if any); and
- that accommodations provided to employees with disabilities may not fully address the barriers that disable them.

Management must be sensitive to how they manage performance, including discipline, to ensure that it is free of discriminatory conduct.

Management must not tie the employee's need for an accommodation to an assessment of their job performance.

### 7.9 Provide opportunities for internal advancement or reassignment

When providing opportunities for internal advancement or reassignment, Manitoba Public Insurance will ensure that its processes take into account:

- that employees may be disabled by one or more barriers in the workplace;
- the employee's IAP (if any); and
- that accommodations provided to employees with disabilities may not fully address the barriers that disable them.

Other requirements and commitments to remove barriers to staffing for employee advancement or reassignment are similar to those stated in Section 7.3.

### 7.10 Return to Work Process

Manitoba Public Insurance is committed to providing a safe and healthy work environment for employees who have been absent from work due to a disability or health condition and require reasonable accommodations to return to work.

Manitoba Public Insurance's primary goal is to return the employee to their original position in the organization. This often involves offering gradually increased, modified, or alternate duties that are meaningful and remain within the employee's functional abilities.



## **Accessible Employment Policy**

---

Once a return to work plan has been put in place for an employee, it will be reviewed regularly to determine if additional resources are required to facilitate a full return to original duties. The plan will be updated as required.

### **7.11 Provide training**

Training on how to accommodate employees who are disabled by barriers will be provided to staff with the following responsibilities:

- recruiting, selecting, or training employees;
- supervising, managing, or coordinating the work of employees;
- promoting, re-deploying or terminating employees; and
- developing and implementing accessible employment policies and procedures.

The content of the training will include instruction about:

- how to make employment opportunities accessible to people who may be disabled by barriers in the workplace;
- how to interact and communicate with employees who face barriers, use assistive devices, or are assisted by a support person or service animal;
- an overview of the AMA, the Human Rights Code, and the Accessible Employment Standard; and
- Manitoba Public Insurance's accessible employment policies and procedures.

### **7.12 Maintain Privacy**

Manitoba Public Insurance protects the privacy and confidentiality of its employees' personal information and personal health information, and will only collect, use and disclose the minimum amount of information required to fulfil its obligations under the Accessible Employment Standard, unless the employee consents to the use or disclosure.

Any personal information or personal health information provided for the purposes of accommodation will be stored separately from the employee's personnel file in a secure location, with limited access.

**END OF ACCESSIBLE EMPLOYMENT POLICY**

This document is available in alternate formats upon request. Please contact [accessibility@mpi.mb.ca](mailto:accessibility@mpi.mb.ca) for assistance.

