



Accessible Employment Policy Manitoba Jockey Club Inc

We are 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.

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.

This policy applies to management, human resources practitioners and employees specify roles that are specific to our organization.

Pre-employment Accessibility Requirements

Remove barriers to recruitment and selection

During recruitment we inform potential applicants that reasonable accommodation is available during the selection process, and we respond to requests for accommodation. We practice this by:

- 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 accommodation during the selection process, we consult with the applicant to determine the appropriate accommodation and then put the appropriate accommodation in place during the assessment or selection process.

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 accommodation in our letter of offer to new employees.
- We include information about workplace accommodation in our new employee orientation materials.

Employment Accessibility Requirements

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.

- We provide information to employees about our policies for employees with disabilities and any updates in multiple ways such as memos, staff emails, posted in the staff and punch clock room or through weekly manager meetings.

Communication

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 support needed when providing information to the employee.
- Ensure that identified accessible formats or communication supports are continually used when providing information to the employee.

Provide individualized accommodation plans (IAP's)

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

This individualized accommodation plan includes:

- Accessible formats and communication support, if requested.
- Workplace emergency response information, if required.
- Details of how and when any other accommodation 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.
- Complying with the individualized accommodation plan.
- Offering ongoing feedback related to modifications, including whether the accommodation is no longer required.

Supervisors will review the accommodation plan on the three-month date and in combination with regular annual employee reviews.

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

- The employee's workspace is modified or relocated.
- The employees' 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.

We support employees by providing reasonable accommodation in the workplace. Employees may make a verbal or written request to their manager or supervisor 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 workplace accommodation for employees with disabilities.

An employee may request assistance with developing the plan including assistance from another person who is knowledgeable about workplace accommodation for employees with disabilities.

We 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.

We may deny an employee's request for an individualized accommodation plan in the following circumstances:

- The employee can carry out most of the job without accommodation.
- The independent regulated health professionals do not support the employee's self-assessed requirement for workplace accommodation.
- Our research and evidence show that the accommodation requested would cause undue hardship like creating safety risks for other employees or significant measurable financial burden.

Performance

We ensure our performance management process considers:

- 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.
- We meet with new staff 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 or 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.

Career development, training, internal advancement and reassignment

When providing career development, training or opportunities for internal advancement or reassignment, we ensure the process for recruiting and selecting candidates considers:

- 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 impact 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.

Return to work process

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 accommodation to return to work.

We include a description of the process we will follow in determining the accommodation necessary to facilitate the return to work of employees who have been absent due to a disability or health condition.

Our return-to-work policy ensures reasonable accommodation for employees who are at work or absent due to a disability or health condition. We will 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.

- We keep in touch with absent employees and the Workers Compensation Board of Manitoba (where involved) throughout the employees' 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.
- We recognize that pandemics, like COVID-19, pose serious health threats to people with pre-existing conditions and we accommodate affected employees.

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.
- 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 received workplace emergency response information requires the assistance of another person during an emergency, we obtain consent from the employee who will assist, and we inform that person how to assist.

We annually send a memo to all employees to inquire whether they need assistance during an emergency and to remind them of the building's emergency plan.

We regularly discuss general accessibility and identify barriers during Workplace Health & Safety 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 security manager who acts as fire marshal, ensures communication with these employees during the emergency. The security manager also notifies the fire department about the number and location of employees who remain in the building.

Privacy and confidentiality

We protect 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 Freedom of Information and Protection of Privacy Act (Manitoba) and The Personal Health Information Act (Manitoba).

- We follow proper protocol when storing confidential employee information.
- We always protect our employees' personal information and personal health information by using confidential forms and locking file storage as well as limiting access to human resources and managers only.

Training

We 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.

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
- Our organization's accessible employment policies, practices, and measures, including updates or challenges.

We train new employees and management as soon as reasonably possible, and no later than one month after hiring. We provide refresher training regularly, including informing staff about updates to policies, practices, and measures.

Written records

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 let the public know that our policies are available upon request, and we provide these in a format that is accessible for the user. These policies are posted on our website.