

 <p>DIVISION SCOLAIRE <b>LOUIS RIEL</b> SCHOOL DIVISION</p>	<p><b><i>Employment Accessibility Practices</i></b></p>
<p>ADMINISTRATIVE PROTOCOL Effective Nov. 18, 2025</p>	<p>Supporting <a href="#">Policy ACE</a> &amp; <a href="#">Policy GBA</a></p>

As outlined in Policy GBA – Employment Practices: Diversity, Equity & Inclusion, the Louis Riel School Division (LRSD) is committed to diversity, equity, and inclusion in employment. As such, the Division strives to implement employment practices that reflect the rights guaranteed in the [Canadian Charter of Rights and Freedoms](#). As outlined in [Policy ACE – Commitment to Accessibility](#), LRSD upholds its responsibilities under [The Accessibility for Manitobans Act](#) and commits to:

- ensuring equal access and participation;
- treating people in ways that allow them to maintain their dignity and independence; and
- meeting the needs of people who face accessibility barriers in a timely manner.

The present administrative protocol details practices employed by LRSD to ensure accessibility to employment for persons with disabilities.

## I. PRE-EMPLOYMENT ACCESSIBILITY REQUIREMENTS

During recruitment, potential applicants are informed that reasonable accommodations are available during the selection process, and the division will respond to requests for reasonable accommodations. This may include interviews, written tests, or on-the-job skills demonstrations, etc.

A statement is included on all job postings that reasonable accommodations are available to applicants with disabilities. When applicants make a request, we seek their advice on how best to accommodate their needs.

Tips to Principals and Supervisors:

- When making interview arrangements in writing or verbally, inform applicants that reasonable accommodations are available during the assessment and selection processes.
- Choose an accessible location, with level entry or elevators, and provide assistance if requested.
- When an applicant has made a request for an accommodation during the selection process:
  - Consult with the applicant to determine the appropriate accommodation.
  - Put the appropriate accommodation in place during the assessment or selection process.
- Set up the interview room in an accessible way. For example, choose an interview room that is brightly lit and quiet to minimize distractions. This is especially helpful for individuals who may have some hearing loss or are anxious.
- Use standardized interview scripts, questions and scoring to avoid bias among candidates in the interview process.

- Do not create job requirements that are not necessary to perform the job. For example, do not require applicants to have a driver's license, when they could use other transportation to carry out their job. Consider what is actually required to perform the job.
- Advertise the job to employment agencies that serve people with disabilities.
- Never assume what a candidate can or cannot do. For example, if a position requires a valid driver's license, do not assume that a candidate who uses a wheelchair is unable to drive.

## **2. WORKPLACE ACCOMMODATIONS WHEN OFFERING EMPLOYMENT**

When making an offer of employment to a successful candidate, inform the individual about the division's policies and practices regarding reasonable workplace accommodations. This could be verbally, by e-mail, or in an offer letter.

Tip to Principals and Supervisors:

- Many employees who could benefit from an accommodation may fear that disclosing a disability will negatively impact their career, so offer reassurance to new employees that you wish to support their success.

## **3. MAINTAINING AN ACCESSIBLE WORKPLACE**

The Accessibility Standard for Employment requires that employers make their workplaces accessible by taking action in the following seven areas:

1. Inform Employees About Accommodation Policies & Practices.
2. Communicate in a Way that Meets Employees' Needs.
3. Provide Individualized Accommodation Plans (on request of an employee).
4. Take Accessibility into Account During Performance Management, Career Development & Reassignment Processes.
5. Return to Work Process.
6. Keeping Employees Safe during Emergencies.
7. Practice Thorough Recordkeeping, Maintain Confidentiality, and Complete Training on Accessible Employment.

## **4. INFORM EMPLOYEES ABOUT ACCOMMODATION POLICIES & PRACTICES**

LRSD keeps employees informed about our accommodation policies, practices, and procedures for employees with disabilities. We also provide updates to employees when this information changes. Information and updates may be provided in multiple ways such as:

- Posted on the divisional portal, divisional website, in newsletters, memos, or through staff e-mails.
- Posted in the staff room or in high traffic areas.
- Included in posters, brochures, or pamphlets.
- Through discussions with management (in person, by phone, or through e-mail).
- During staff meetings.

Tip to Principals and Supervisors:

- Print and post the [Discussing Accessibility in the Workplace](#) information sheet (Accessibility Manitoba) in staff areas.

## **5. COMMUNICATE IN A WAY THAT MEETS EMPLOYEES' NEEDS**

LRSD aims to meet the communication needs of our employees by providing workplace information and communications in ways that are easy to access for everyone. To that end, accessibility tools are embedded within the divisional website and various commonly-used software packages. If requested by an employee with a temporary or permanent disability, we:

- Consult with the employee to identify what accessible formats (i.e., large print, recorded audio, electronic formats, braille, etc.), or communication supports (i.e., texting, handwriting, etc.) are needed or most appropriate for them.
- Ensure that identified accessible formats or communication supports are continually used when providing information to the employee.

## **6. PROVIDE INDIVIDUALIZED ACCOMMODATION PLANS (ON REQUEST OF AN EMPLOYEE)**

LRSD will provide reasonable accommodations by developing and documenting individualized accommodation plans for employees with disabilities who request them. The division also offers support to employees on sick leave, long term disability, or WCB leave, as well as those returning to work following illness or injury. In addition, information and assistance are available regarding workplace injuries, long-term disability, workplace accommodations, and related matters.

### Responsibilities of the Division

#### Responding to Requests:

- The division will respond to requests from employees with disabilities to develop individualized accommodation plans. Possible accommodations will be assessed on a case-by-case basis. The division may also initiate discussions with employees to determine whether workplace accommodations are needed and propose a plan, as appropriate.

#### Collaborate with the Employee and Union (where applicable):

- Employees, their union representative (where applicable), and the division will work together to identify reasonable accommodations that best meet the employee's individual needs. All parties share responsibility for the creation, implementation, and ongoing management of the individualized accommodation plan.

#### Assessment and Documentation:

- To determine appropriate accommodations, the division may request supporting documentation from a qualified health practitioner or arrange for an independent assessment by a regulated health professional. The division is not obligated to provide the exact accommodation requested by the employee. Accommodations will be designed to remove barriers and will be reasonable in scope.

#### Individualized Accommodation Plan:

- Each accommodation plan should include:
  - Accessible formats and communication supports, if requested.
  - Workplace emergency response information, where relevant to the disability.
  - Details outlining how and when accommodations will be provided.
  - A schedule for reviewing and, if necessary, updating the plan.
- Employees will receive a copy of their plan in an accessible format and with any required communication supports.

#### Denial of Accommodation Requests:

- If a request for an individualized accommodation plan is denied, the division will provide the employee with written reasons for the decision, in an accessible format and with any required communication supports.
- Requests may be denied for various reasons, including the following:
  - The employee is able to perform the essential duties of the position without an accommodation.
  - A regulated health professional does not support the employee's request for accommodation.
  - The requested accommodation would cause undue hardship to the division (e.g., pose safety risks to others, significant impact on operations, or result in significant financial burden).

#### Review and Updates:

- The division will establish a timeframe for reviewing accommodation plans. Plans must be updated upon request by the employee or when there are changes to job duties, the workplace, or relevant medical information.

#### Privacy and Confidentiality:

- The division will protect the privacy and confidentiality of all personal and health information in accordance with [Policy GBL – Management of Employee Files](#). Information will only be collected, used, and disclosed as required under the *Accessibility Standard for Employment*, *The Freedom of Information and Protection of Privacy Act (FIPPA)*, and *The Personal Health Information Act (PHIA)*, unless otherwise agreed to by the employee.

### Responsibilities of the Employee

#### Requesting Accommodation:

- Employees are responsible for initiating requests for workplace accommodations. Requests may be made verbally or in writing to their Principal or Supervisor or to Staff Services for the development of an individualized accommodation plan.

#### Collaboration:

- Employees are expected to work cooperatively with the division (and their union representative, if applicable) to identify accommodations that best meet their individual needs. Both the employee and the division share responsibility for creating and implementing the individualized accommodation plan.

#### Participation in Assessment:

- Employees must participate in the accommodation assessment process by providing relevant information or documentation, such as evaluations from a qualified health professional (e.g., physician, psychologist, occupational therapist, or physiotherapist).
- Adherence and Communication  
Employees are required to comply with the established accommodation plan and to provide updates or feedback when modifications are needed or when the accommodation is no longer required.
- The employee may be represented by a union representative during the development of the individualized accommodation plan.

## **7. TAKE ACCESSIBILITY INTO ACCOUNT DURING PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT & REASSIGNMENT PROCESSES**

### Performance Management

LRSD will ensure our performance management process considers:

- That any related discussions and documentation is provided in accessible formats and meets the communication support needs of the employees.
- An employee's individualized accommodation plan.

In determining the impact of a temporary or permanent disability on an employee's performance, consideration should be given to the possibility that the accommodations provided may not fully address a workplace barrier which could affect their performance.

### Career Development and Reassignment

When providing career development, training or opportunities for internal advancement or reassignment, the division will ensure the process for recruiting and selecting candidates meets the employees' communication support needs. If an employee has an individualized accommodation plan, the division will collaborate with the employee (and their union representative, where applicable) to review the plan with respect to any barriers presented by the new opportunity. Where necessary, accommodation supports will be adjusted and the plan updated. When developing or contracting out training programs, consideration should be given to the accommodation needs of the employees in advance. For example, advising trainers whether employees require accommodations for the training.

## **8. RETURN TO WORK PROCESS**

LRSD is committed to providing a safe and healthy working environment for employees who are, or have been, absent from work due to a disability, injury, or health condition, and who require reasonable accommodations to facilitate their return to work. This process may involve modifying job duties, adjusting work schedules, or implementing other accommodations based on the employee's functional abilities.

The division will keep in touch with absent employees (or their union, where applicable) throughout the employees' recovery to help them maintain a connection with their workplace and to show they are valued.

When planning for an employee's return to work, we confirm the employee's current restrictions by having the employee's health care professional complete return to work paperwork, which may include a medical inquiry or a Functional Abilities Assessment Form.

## **9. KEEPING EMPLOYEES SAFE DURING EMERGENCIES**

The division has emergency response plans in place for all buildings on divisional properties, including procedures for assisting persons with disabilities in specific emergency situations (see [Policy EBCA – Emergency Preparedness Plan](#)). Staff are notified on steps to be taken during emergencies, to ensure the safety of all employees, including those who are temporarily or permanently disabled. Employees requiring accommodations to safely evacuate the building during an emergency must inform the Principal or Supervisor and request that an individual workplace emergency response plan be developed; the plan will be stored in the emergency plan binder.

The employee must request a review of the plan if:

- The employee is moved to a different workspace within the building or to a different building.

- The employee's accommodation needs change.
- Revisions to the general emergency response plan impact the employee's ability to evacuate safely.

For an employee who has an individualized emergency response plan requiring the assistance of another person during an emergency, the division will obtain consent from the employee requiring assistance to share this information with the individual who is designated to assist them during the emergency.

See Assistance in an Emergency.

## **10. PRACTICE THOROUGH RECORDKEEPING, MAINTAIN CONFIDENTIALITY, AND COMPLETE TRAINING ON ACCESSIBLE EMPLOYMENT**

### Maintain Privacy

LRSD will protect the privacy and confidentiality of employees' personal information and personal health information in accordance with [Policy GBL – Management of Employee Files](#). The division may 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 FIPPA (The Freedom of Information and Protection of Privacy Act – Manitoba), and PHIA (The Personal Health Information Act – Manitoba).

### Training

LRSD removes and prevents barriers at various stages of employment consistent with our commitment to employment accessibility and as required by the Accessibility Standard for Employment. Employees are informed of LRSD policy and practices related to accessible employment through the letter of offer. Employees with questions may seek clarification from their Principal or Supervisor, or Staff Services. We ensure training is provided to staff as soon as reasonably possible, and no later than three months after hiring. We inform employees about updates to policies and refresher training is provided as needed, following updates.

All training is recorded in the Learning Management System, Staff Services system, or at the school level.

The division 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 or redeploying employees.
- Developing and implementing employment policies and practices.

The training content should include:

- 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.
- The division's accessible employment policies and practices, including updates or changes.

### Recordkeeping

LRSD accessibility policies are kept on the division website. The content of the training is provided above along with when the training is provided. The division will let the staff and members of the public know that our policies are available upon request and that we provide these in a format that is accessible for the user. The policies are available upon request in the following ways:

- Posted on website, on social media, or in newsletters.
- Posted at our building entrance, reception desk, or in high traffic areas.
- Included in posters, brochures, pamphlets, or advertisements.
- Through employees, or management (in-person, by phone, or through recorded greetings).
- Policies are provided within a reasonable timeframe, and in a format that meets the needs of individuals with a disability, at no additional cost.