

Accessibility

Policy Owner: Director of Human Resources

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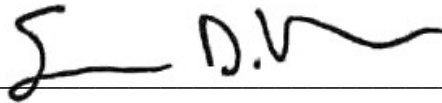
Applies To

LGCA board members, senior managers, managers, supervisors and staff. For simplicity, the term “employee” is used in this document to include everyone to whom this policy applies.

Authorization

The Accessibility for Manitobans Act (the Act) mandates that all government agencies develop an accessibility plan to address accessibility barriers in policies, procedures and practices. The LGCA is authorized to develop and implement operational management policies in its capacity as employer, including policies that outline requirements to comply with provincial legislation, regulations or policy.

Authorized by board chair:



Authorized by executive director:



Purpose

This policy provides guidance to employees regarding the LGCA’s role in complying with the requirements established under the Act and associated standards. This policy establishes measures and practices respecting barrier-free access to the LGCA’s services and premises.

Definitions

“access”

Persons have barrier-free access to places, events and other functions that are generally available in the community. This includes barrier-free access to services and information delivered by the LGCA and at its premises.

“accessible customer service”

Provided when all persons who are reasonably expected to seek to obtain, use or benefit from a good or service have the same opportunity to obtain, use or benefit from the good or service.

This document is available in alternate formats, upon request.



“accessibility”

The ability to access and benefit from a system, service, product, or environment.

“accommodations”

Temporary or permanent arrangements made to allow persons disabled by barriers to access, participate or benefit equally in the LGCA’s services or premises, provided the LGCA does not experience undue hardship. There is no set formula for accommodating people disabled by barriers; the person involved must be consulted.

“active offer”

Offering the public the opportunity to request accessible services. Examples include a statement in public-facing communication materials that invites requests for accommodations, or advertising disability accommodations for offices with a wheelchair access icon.

“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. A barrier may include a physical barrier; an architectural barrier; an information or communications barrier; an attitudinal barrier; a technological barrier; or a barrier established or perpetuated by an enactment, a policy, a procedure or a practice.

Policy

The LGCA is committed to providing all people equal access to our services and premises. We are committed to identifying, removing, and preventing barriers to access and meeting the requirements of the Act and regulations.

We seek to provide a barrier-free environment for all people with whom we interact in a way that allows them to maintain their dignity and independence. Providing an accessible and barrier-free environment is a shared effort of all LGCA employees. We all play a part in creating an equitable and inclusive environment to ensure a safe, dignified, and welcoming environment for our colleagues and those we serve.

Development of LGCA Accessibility Plan

The LGCA will develop a multi-year accessibility plan in accordance with any requirements established under the Act, regulations or required by the Manitoba Accessibility Office. The plan must address each of the five standards under the Act as they are released. The LGCA will make its accessibility plan and this policy available to the public on its corporate website with an active offer to provide it in an accessible format

Every two years, or following the release of a new or revised standard, the LGCA will evaluate its multi-year accessibility plan to determine if it is meeting its objectives and goals.

The LGCA will continually review and develop its corporate policies to ensure they promote the principles of dignity, independence, integration, and equal opportunity for people disabled by barriers, and comply with the Act and regulations.

Customer Service Standard and Accessible Employment Standard

Under the Act, public agencies like the LGCA are required to meet standards established in regulation regarding accessibility. Currently, the Customer Service Standard and Accessible Employment Standard have come into force; subsequent standards will be released in coming years. Appendices A and B detail the specific requirements, expectations, and duties that the LGCA and its staff will undertake in ensuring accessible service and accessible employment are provided.



Training for LGCA Employees

The LGCA will provide training to all employees within three months of starting employment with the LGCA on accessibility requirements under the Act and corresponding standards. Following the release of additional standards or every two years, the LGCA will provide training to ensure all employees are up to date and familiar with new standards or changes.

Employees must also be trained on this policy, specific LGCA processes and procedures, and the accessibility plan that serve to improve the accessibility of the LGCA. If this policy or associated procedures change, employees must be trained on those changes.

Appointment of LGCA Accessibility Coordinator

The executive director will appoint an existing LGCA employee to work as the LGCA's accessibility coordinator. The LGCA accessibility coordinator is responsible for coordinating the administration of the accessibility plan, this policy, and providing advice to other employees to improve the accessibility of LGCA services and premises.

Feedback Process

Clients and members of the public may provide feedback on how the LGCA provides accessible services. All feedback will be forwarded to the LGCA accessibility coordinator and the process for submitting feedback will be made available to the public with an active offer to provide the information in an accessible format. Procedures on the feedback process are outlined in Appendix A.

Exceptions

The LGCA is required to comply with the Act and regulations. Therefore, exceptions will only be approved by the executive director or board chair in exceptional circumstances, and only following consultation with the Manitoba Accessibility Office.

Violations

Violations of this policy by an employee may lead to the LGCA being in violation of the Act and regulations. As a result, failure to comply with this policy may result in disciplinary action, up to and including termination of employment for cause.

Related Documents

- **Policy:** Respectful Workplace
- **Policy:** Accommodation and Return to Work
- **Plan:** LGCA Accessibility Plan
- **Training Program:** Accessibility for Manitobans Act Training
- The Accessibility for Manitobans Act
- Customer Service Standard Regulation
- Accessible Employment Standard Regulation

Contact

Contact the director of human resources with questions about this policy.



APPENDIX A: Customer Service Standard

The LGCA will provide services and information to clients and the public who are disabled by barriers in ways that take into account the nature of the barrier. If a person requests a service and/or information in an alternate format, the LGCA will consult with the person making the request to ensure service/information is provided in a way that takes into consideration the nature of the barrier faced by the individual.

All service/information provided in an alternate format must be made available to the person requesting the service/information within a reasonable timeframe. Upon identifying what barriers to accessibility exists, the employee will then determine if an appropriate method of service/information is readily available or if further accommodation is required. If further accommodation is required, the employee will contact the accessibility coordinator to identify alternate service/information options. The accessibility coordinator will work with the appropriate service provider, either internally or externally, to develop a service/information option acceptable to the individual requiring an accommodation.

Within three working days (e.g., Monday through Friday) of receiving a request, the LGCA must notify the individual of the anticipated timeline to be able to provide service/information in an alternate format. If the requested service/information cannot be provided in the alternate format requested, the LGCA must notify the individual within three working days to provide them with an explanation why their request cannot be accommodated.

The LGCA will not impose a fee or charge relating to an accommodation for an individual disabled by a barrier, unless the LGCA cannot reasonably accommodate the person otherwise. If a barrier cannot be reasonably removed, the LGCA will seek to provide the individual disabled by the barrier access to services, information and/or LGCA premises by an alternate means (temporary or permanent). The LGCA will seek to prevent the creation of new barriers.

Assistive Devices, Support Persons, and Service Animals

The LGCA welcomes, recognizes and will provide assistance to persons that use assistive devices, support persons or service animals, providing reasonable accommodation to those who use these supports (i.e., access for supports while on premises). It is the responsibility of the client with a service animal to maintain care and control of the animal at all times.

Communications Materials

Active Offer

All publicly available documents (e.g., forms, terms and conditions) must include an active offer for alternate formats. This notice must state: "This document is available in alternate formats, upon request." The notice must be in black text and no smaller than 14-point font.

Alternate Formats of LGCA Documents

If an individual requires a document or form in an alternate format, the accessibility coordinator will work in consultation with the Communications Department to create the document in an alternate format or provide the information verbally.

Signage

The LGCA will post signage at each service access point (e.g., front entry at each office, homepages of corporate websites and service portals) indicating the LGCA is committed to reducing barriers to access. Signs will also indicate active offer to ensure persons disabled by barriers can request supports, and that support persons and service animals are welcome.



Websites

The LGCA's website content (e.g., corporate site, MyLGCA, Know My Limits site) will be reviewed to identify ways to improve accessibility and develop all new content to comply with the Web Content Accessibility Guidelines.

Built Environment (LGCA Premises)

The LGCA will review and document accessible features of all LGCA premises, making information available to the public. Any aspect of the LGCA's premises intended to facilitate barrier-free access to services must be available for use in its intended manner. If any such aspect is unavailable, notice must be given including the reasons why and an estimate of when the aspect will be available, and must be prominently displayed at the applicable premises and on the LGCA website.

In order to maintain barrier-free access in physical premises, all employees must keep the workplace clear of clutter and other obstacles that may cause a barrier to accessibility.

Public Events

If the LGCA hosts a public event (e.g., safe grad presentation, public consultation), the LGCA will ensure reasonable measures are taken to provide notice of the event in a manner that is accessible to persons disabled by barriers. This will include active offer for alternate formats of the event invite upon request. Meeting places for events will be as accessible as possible and any requests will be met, provided they do not result in undue hardship.

Feedback and Documentation

The accessibility coordinator is responsible for reviewing feedback from clients and the public regarding the accessibility of the LGCA's services, and incorporating that feedback into the LGCA's accessibility planning process. As well, when receiving feedback, the accessibility coordinator must acknowledge receipt of the feedback within three working days.

The accessibility coordinator will work with the Communications Department to ensure contact information (e.g., email, phone) and the process for providing feedback is made publicly available on the corporate website and at each office location. Any resulting actions will be documented and available on request.

The LGCA will document the measures, policies and practices implemented based on accessibility commitments through the feedback process and will provide copies upon request. Notice of document availability will be prominently displayed at the LGCA's premises and website. If a document is requested by a person who is disabled by a barrier, the document must be given to the person in a manner that takes that barrier into account, within a reasonable timeframe, and at no cost. The LGCA will consult with person's requesting alternate formats to ensure the information is provided in a way that takes into consideration the nature of the barrier faced by the individual.

Training

The Human Resources Department will identify employee training programs that address the following topics:

- Background and purpose of the Act and The Human Rights Code (Manitoba);
- Requirements of the each of the five standards under the Act (as they are released), and explanation of all policies relating to released standards;
- How to interact and communicate with clients disabled by barriers;
- How to interact and communicate with persons disabled by barriers, including those requiring the use of an assistive device, support person, or service animal.
- How to help a client disabled by barriers if they are having difficulty accessing LGCA's services, information or premises;
- Instruction on active offers and reasonable accommodation; and
- LGCA's accessibility policy and procedures that serve to improve the accessibility of the LGCA.



The Human Resources Department will notify employees when they are required to attend training. Customized training on complex accessibility requests will be provided as needed. The Human Resources Department will document all training, policies, including a summary of the training and schedule of when training was provided.



APPENDIX B: Accessible Employment Standard

Please refer to the Accommodation and Return to Work Policy and related procedures that detail individualized accommodation plans and return to work processes.

Staffing

Applicants who are disabled by a barrier in respect of the recruitment, assessment or selection process of a staffing competition may request reasonable accommodation from the LGCA. The LGCA provides notice through advertisements, its websites, and communication during a competition that applicants may request reasonable accommodations if required. The LGCA will consult with applicants to determine the reasonable accommodation for the barrier(s) identified and will provide or make arrangements for those reasonable accommodations.

The LGCA includes with all offers of employment information related to accessibility, policies, and practices for accommodation.

Training

The Human Resources Department will identify management training programs regarding accessible employment and recruitment. Training will address the following:

- Accommodations in the recruitment, selection or training of employees;
- Accommodations in the supervising, managing or coordinating of employees;
- Accommodations in the promotion, redeployment or termination of employees;
- Making employment opportunities accessible; and
- How to interact and communicate with persons disabled by barriers, including those requiring the use of an assistive device, support person, or service animal.

The Human Resources Department will notify employees when they are required to attend training. Customized training on complex accessibility requests will be provided as needed. The Human Resources Department will document all training, policies, including a summary of the training and schedule of when training was provided.

Performance Management

When management undertakes performance management, they must take into account that an employee may be temporarily or permanently disabled by a barrier(s) in the workplace; have an accommodation plan; or if an accommodation is in place, that it may not fully address the barrier(s) faced.

Career Development Training and Internal Advancement

Similar to performance management, career development training or promotional opportunities must take into account that an employee may be temporarily or permanently disabled by a barrier(s) in the workplace; have an accommodation plan; or if an accommodation is in place, that it may not fully address the barrier(s) faced.

Workplace Emergencies

The LGCA will provide an employee who is temporarily or permanently disabled by a barrier(s) in the workplace with information on how to respond to an emergency, if the disability would create particular risks or challenges for the employee. Emergency response information and plans will be specific to the employee's particular barrier(s) and the physical nature of the workplace. If an employee's workspace moves, changes or there are changes to the LGCA's emergency response plans, the LGCA will review the employee's emergency plan information.

If an employee who is temporarily or permanently disabled by a barrier(s) in the workplace requires assistance from another person in an emergency, the LGCA, with the employee's consent, may provide the designated support person information required to be able to assist the employee in an emergency situation.

