

## Ryerson Human Resources Policy – HRP-034

### Accommodation Policy (Manitoba)

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## 1 INTRODUCTION

Ryerson Canada, Inc., herein referred to as "Ryerson" is committed to creating and maintaining a barrier-free work environment to ensure the full participation of all persons. To this end, Ryerson will, where it is possible and reasonable to do so and does not cause Undue Hardship or cause a health and safety concern, provide Accommodations for all current and potential Employees with equal opportunities.

Ryerson is committed to operating based on *The Accessibility for Manitobans Act (AMA)* to accommodate and overcome barriers in a timely fashion.

Accommodations will be achieved in a way that respects the dignity of the individual, takes into account the person's disability, and preserves confidentiality.

## 2 DEFINITIONS

**"Accommodation"** is a measure taken to alter or eliminate a policy, practice or physical feature of the worksite which has or may have an adverse impact on, and which constitutes a barrier to, the full participation of Employees because of any protected ground identified in the *Alberta Human Rights Act*.

**"Bona Fide Occupational Requirement"** is a standard, policy or rule that is a necessary job requirement made in good faith.

**"Duty to Accommodate"** means Ryerson will ensure that Employees can work effectively by making adjustments or modifications to their work or work environment up to the point of Undue Hardship. The Duty to Accommodate does not require exempting an Employee from performing the essential duties of their job or requirements of the service.

**"Employee(s)"** is a person who is hired for a wage, salary, fee or payment to perform work for Ryerson or candidates in the process of applying for an available position with Ryerson in the province of Alberta.

**"Undue hardship"** is determined on a case-by-case basis. Factors that constitute or contribute to Undue Hardship include but are not limited to; unbearable financial cost or considerable disruption of business, an interference with the rights of others, or where the Accommodation would create a health and safety hazard. If any of these factors create a burden which cannot be reasonably borne by Ryerson the obligation to accommodate is suspended.

## 3 COMMITMENT

The overall responsibility for implementing this policy rests with Ryerson. Ryerson will advise Employees about their right to Accommodation(s) and assist the Employee in identifying the most suitable Accommodation, as well as determining Bona Fide Occupational requirements and the impact to the Accommodation process as a result.

There is, however, a shared responsibility for ensuring that Accommodation needs are identified. The Employee has a responsibility for requesting Accommodation including identifying, where possible, the types of Accommodation they consider appropriate.

The Duty to Accommodate does not require exempting an Employee from performing the essential duties of their job or requirements of the service. The Duty to Accommodate does not require Ryerson to fundamentally change the working conditions, re-assign the essential duties to another, or change the essential requirements of a position. In these cases, a next-best solution, such as alternative work may be found.

#### **4 INDIVIDUALIZED ACCOMMODATION PLANS**

The onus for initiating the Accommodation request rests with the Employee who requires the Accommodation.

Once an Employee has requested an Accommodation to their manager or Human Resources, all parties will work together to see if an appropriate Accommodation plan is available. Employee's must participate and cooperate in the facilitation of the Accommodation process and provide any necessary documentation. An Employee requesting an Accommodation is expected to be reasonable in responding to proposals put forward by Ryerson.

Where Accommodation(s) are requested, Ryerson will make every effort to develop and document individual Accommodation plans for affected Employees who request them up to the point of Undue Hardship. Individual Accommodation plans will be reviewed regularly in the first year and on an as-needed basis thereafter as determined in the plan. The individual Accommodation plan may include but is not limited to:

- a) Accessible formats of communication (e.g. written or enlarged font, emails, verbal, assistive listening devices, conference captioning, quiet rooms or small group meetings)
- b) Modified emergency response plans specifically developed based on the individual's abilities or limitations
- c) Modified or relocated workspace(s)
- d) Flexible work hours to accommodate medical appointments

##### **4.1 RETURN TO WORK**

Ryerson's Disability Management Policy details the commitment to providing a safe and healthy work environment for Employees that have been absent from work due to disability or health conditions and require reasonable Accommodations to return to work. Ryerson will endeavor to make reasonable efforts to make modifications based on the Employee's functional abilities as recommended by the treating physician and/or other healthcare practitioner(s) up to the point of Undue Hardship.

##### **4.2 PERFORMANCE REVIEWS AND CAREER DEVELOPMENT**

During performance reviews, individual Accommodation plans will be taken into consideration to understand potential barriers or modified duties.

Ryerson is dedicated to providing a workplace that provides career development. If a person with an Accommodation Plan has the opportunity for advancement, Ryerson is vested in ensuring they have Accommodations to allow for equal opportunity.

## **5 PRE-EMPLOYMENT ACCESSIBILITY**

Ryerson is committed to removing barriers during the recruitment and selection process. During recruitment, Ryerson will inform potential applicants in the job posting that reasonable Accommodations are available during the selection process upon request. Where an applicant has requested Accommodation(s), staff will consult with the applicant to endeavor to acquire an appropriate form of Accommodation best suited to their needs.

## **6 PROCESSING REQUESTS**

### **6.1 SUPERVISORS AND MANAGERS**

On receiving a request for Accommodation, the supervisor/ manager will:

- a) In consultation with Human Resources, identify Accommodation options appropriate to that Employee;
- b) work in close cooperation with the Employee and/or their representative;
- c) pass the request to the Human Resources Manager if the Accommodation requires action that exceeds the supervisor's budget or authority to act;
- d) participate and cooperate to facilitate the Accommodation.

### **6.2 MANAGER OF HUMAN RESOURCES**

On receiving a request for Accommodation, the Human Resources Manager will:

- a) work with the Employee to find the most appropriate means of Accommodation;
- b) ensure that the Employee can participate in the process as fully as possible;
- c) seek the advice of a specialist, with the Employee's consent, where the request involves issues outside the expertise of Ryerson;
- d) confer with senior leadership if an Accommodation request requires a commitment of resources which the Human Resources Manager believes is beyond the budget for Accommodation or raises the likelihood of Undue Hardship.

### **6.3 EMPLOYEE**

An Employee who requests Accommodation(s) will:

- a) advise their Supervisor/Manager of their need for Accommodation in a timely manner or if they require any changes to their current plan;
- b) provide all relevant information requested by Ryerson in assessing the request. This can include non-confidential medical or functional ability reports from the treating physician(s) that clearly set out the restrictions, abilities and Accommodation needs;
- c) co-operate in the search and implementation of Accommodation(s);

- d) notify their Supervisor/Manager if their needs change;
- e) accept offers of reasonable Accommodation(s) from Ryerson

## **7 APPEALS**

Should an Accommodation request be denied or an alternative offered, the Employee requesting the Accommodation will be informed of:

- a) the reasons for the decision
- b) the right to request a review of the decision

The Employee may submit a request for reconsideration to the Human Resources Manager.

## **8 MONITORING AND REVIEW**

Ryerson will review this Policy annually and will make revisions as necessary or required by legislation.

## **9 RETALIATION**

This policy prohibits any form of reprisal against an Employee who, in good faith requests an Accommodation.

Reprisals include but are not limited to any of the following toward an Employee: hostility, exclusion/ostracism, negative remarks, demeaning duties, discriminatory behavior, harassment, demotion, suspension or dismissal.

## **10 BONA FIDE OCCUPATIONAL REQUIREMENTS**

Exceptions to this policy may only occur in the cases of Bona Fide Occupational requirement.

## **11 CONFIDENTIALITY**

All documents relating to specific requests for Accommodation will be kept confidential and will only be disclosed with the express consent of the Employee. No documentation with regards to Accommodation will be kept in the personnel file of the Employee.