INTERLAKE SCHOOL DIVISION

Accessible Employment Policy

Administrative Procedure	Accessible Employment Policy
Legislative Authority	The Accessibility for Manitobans Act, C.C.S.M. c. A1.7 — Accessible Employment Standard Regulation 70/2019
Date of First Approval	April 2021
Date of Last Update	October 9, 2026
Board Governance Policy Cross Reference	1, 4, 9, 10, 12
Administrative Procedure Cross Reference	8140, 8040, 8090, 8110, 8180, 8130, 8170, 8030, 4070, 4060, 4210, 1040, 1100, 3160, 8210.
Form Cross Reference	IAP (Individual Accommodation Plan); IWERI (Individualized Workplace Emergency Response Information); RTW (Return to Work); FAF (Functional Abilities Form)
Next Scheduled Review	April, Annually
Responsible Office	Human Resources — Office of the Assistant Superintendent

We are identifying, preventing and removing barriers to accessible employment, and to complying with the Accessible Employment Standard Regulation under The Accessibility for Manitobans Act. This Policy reflects the principles of dignity, independence, integration and equal opportunity for people with disabilities in all aspects of the employment relationship — recruitment, hiring, retention, performance management, career development, return to work, and termination of employment.

Where a barrier cannot be removed, the Division will make every effort to provide a reasonable accommodation. An accommodation is reasonable when it:

- is required for a job applicant to participate in the hiring process;
- is required for an employee to perform their employment responsibilities or access the benefits available to them; and
- does not cause undue hardship to the Division.

This Policy is available to the public Accessibility | Interlake School Division and will be provided in an accessible format upon request.

This Policy applies to job applicants and to all full-time, part-time, seasonal, and apprentice employees of the Division, across all worksites, schools and administrative offices.

Part A — Pre-Employment Accessibility Requirements

A.1 Recruitment and Selection

During recruitment, the Division informs potential applicants that reasonable accommodations are available upon request during the selection process.

- All job postings include a statement that reasonable accommodations are available to applicants with disabilities, and applicants are invited to advise the Division of the accommodation that would best meet their needs.
- Where an applicant requests an accommodation during the selection process, Human Resources consults with the applicant to determine the appropriate accommodation and arranges for it to be in place during the assessment or selection process.
- Interview and job requirements are limited to what is genuinely required to perform the role; unnecessary qualifications (for example, a driver's licence where alternate transportation would suffice) are not used to screen candidates.

A.2 Offer of Employment

When making an offer of employment, the Division informs the selected applicant, verbally and in writing, of ISD's measures, policies and practices for accommodating employees who are disabled by one or more barriers in the workplace.

- Information about workplace accommodations is included in new-employee orientation materials.
- New employees are given a copy of this Policy and advised how to request it in an accessible format.

Part B — Accessible Employment Requirements

The Division keeps all employees informed of its measures, policies and practices respecting the accommodation of employees who are temporarily or permanently disabled by one or more barriers in the workplace, and notifies employees whenever those measures, policies or practices change.

- This Policy is reviewed with employees during onboarding and referenced in annual staff communications.

Upon request from an employee who is temporarily or permanently disabled by one or more barriers in the workplace, the Division will:

1. consult with the employee to identify the accessible format or communication support that meets their needs (for example, large print, braille, audio recording, accessible electronic text, captioning, ASL interpretation, or a plain-language summary); and
2. ensure that format or support is used whenever information is subsequently provided to that employee.

Requests for accessible formats or communication supports may be made to the employee's principal/supervisor or to Human Resources, and there is no charge to the employee for this service.

Upon request of an employee who is temporarily, permanently or episodically disabled by one or more barriers in the workplace, the Division will develop and implement an Individualized Accommodation Plan (IAP).

An employee may request an IAP verbally or in writing to their principal/supervisor or to Human Resources.

B.1 IAP Documents

Each IAP is developed collaboratively with the employee and documents any accessible formats or communication supports to be used when providing information to the employee;

- any workplace emergency response information to be provided to the employee;
- any other reasonable accommodation the Division will make to address the barrier(s), and the manner and timing in which it will be made; and
- the date on which the plan will next be reviewed and/or updated.

Assessment and Assistance

- Each employee and their accommodation needs are assessed individually — even employees with similar disabilities or barriers may require different accommodations.
- The employee may request the assistance of a bargaining agent representative, or a person knowledgeable in workplace accommodations, in developing the plan.
- The Division may request an independent evaluation, at its own expense, by a regulated health professional or other qualified practitioner, to help determine the accommodation required. This evaluation cannot be performed by the employee's own regular care provider, and the Division selects the evaluator.
- Where possible, the Division limits requests for medical documentation to what is functionally necessary and does not request a specific diagnosis unless there is a safety concern.

Review, Copies and Denial

- IAPs are reviewed and updated on the timeline set out in the plan, and earlier at the employee's request, or when the employee's workspace, responsibilities, or needs change.
- A copy of the IAP is provided to the employee in an accessible format upon request.
- A request for an IAP may be denied only where the information gathered does not support the employee's self-assessed need, or where the accommodation would cause undue hardship (demonstrable health/safety risk or major, measurable cost). Where a request is denied, the Division provides written reasons to the employee.

Employee Responsibilities

Employees are expected, in good faith, to:

- provide relevant information, including medical documentation where reasonably required, to support the accommodation request;
- comply with the agreed accommodation plan and perform their duties accordingly;
- communicate promptly if the accommodation is no longer required or needs adjustment; and
- participate in any evaluation reasonably requested by the Division to determine the accommodation required.

B.2 Performance Management

Any performance management process used by the Division — including annual reviews, goal-setting, and probationary review — must take into account that:

- an employee may be temporarily or permanently disabled by one or more barriers in the workplace;
- the employee may have an existing IAP, which should be considered and, if necessary, reviewed as part of the process; and
- existing accommodations may not fully address the barrier(s) affecting the employee, and may need to be revisited.

Supervisors are expected to raise performance concerns in a private, respectful setting; to avoid assumptions about an employee's needs or limitations; and to focus discussion on removing barriers rather than on diagnosis.

B.3 Career Development, Training and Internal Advancement

Where the Division provides career development training or internal advancement opportunities, the process for recruiting, selecting, training, promoting or redeploying employees must be inclusive and must account for the same three considerations set out in B.4 above.

B.4 Return to Work Process

The Division is committed to a safe, respectful and inclusive return to work for employees who have been absent due to a temporary, permanent or episodic disability and who require reasonable accommodation to return. This process operates in conjunction with, and does not override, The Workers Compensation Act, where applicable.

Return to work process:

1. Point of contact. Employee's principal/supervisor or Human Resources serves as the employee's main point of contact during the leave and the return-to-work planning process.
2. Early planning. Discussions about a return to work begin as soon as it is medically appropriate, involving the employee and, where the employee wishes, a bargaining agent representative or knowledgeable support person.
3. Functional assessment. Where relevant, the Division requests a Functional Abilities Form (not a diagnosis) from the employee's healthcare provider outlining tasks the employee can safely perform.
4. WCB/MTS Disabilities Case Manager coordination. Where the absence relates to a workplace injury, the Division coordinates with the Workers Compensation Board of Manitoba to confirm functional abilities and align the return-to-work plan.
5. Written plan. A tailored, documented plan is developed describing modified duties or hours, a reintegration timeline, required accommodations, and the responsibilities of those involved. If the employee has an existing IAP, it is reviewed and updated to reflect any change in needs.
6. Monitoring. The Division checks in with the employee at regular intervals following the return and adjusts the plan as needed.

This return-to-work policy is made available to the public and to staff upon request.

B.5 Workplace Emergency Response Information

Where the Division is aware that an employee's barrier may create special risks or challenges in the event of a workplace emergency, the Division will provide that employee with individualized emergency response information specific to their barrier and the physical layout of their worksite.

- This information is developed as soon as reasonably practicable after the Division becomes aware of the need, and is documented as part of the employee's IAP where one exists.
- The information is reviewed whenever the employee changes or the employee's workspace is modified, or whenever the Division updates its general emergency response plans in a way that would affect the employee.

Designated Assistance Person

Where an employee would need the assistance of another person during a workplace emergency, the Division will, only with the employee's consent, share the necessary information with a person designated to provide that assistance.

B.6 Privacy Obligations

The Division protects the privacy and confidentiality of all personal information and personal health information collected under this Policy, in addition to its obligations under The Freedom of Information and Protection of Privacy Act (FIPPA) and The Personal Health Information Act (PHIA).

- Information is collected, used and disclosed only as required to meet the purposes of the Regulation, unless the employee consents to broader use.

- Access to accommodation-related information is limited to the individuals — typically the employee's supervisor and Human Resources — who need it to implement the accommodation.
- Physical records are kept in locked storage and electronic records in password-protected systems.
- Discussions of accommodation needs focus on functional requirements rather than diagnosis.

B.7 Training

The Division ensures that accommodation training is provided to all staff who:

- recruit, select or train employees;
- supervise, manage or coordinate employees;
- promote, redeploy or terminate employees; or
- develop or implement the Division's employment policies and practices.

Training covers: how to make employment opportunities accessible; how to interact and communicate respectfully with people disabled by barriers; how to interact with people who use an assistive device, service animal, or support person; and a review of The Human Rights Code (Manitoba), The Accessibility for Manitobans Act, and the Accessible Employment Standard Regulation.

- Training is provided as soon as reasonably practicable after a person is assigned relevant duties, and refreshed whenever this Policy is materially updated.
- Training delivery: the Division uses the Manitoba Accessibility Office's free on-demand training modules (available at AccessibilityMB.ca).
- A written training log is maintained recording who was trained, on what content, and when, as required for public sector/large employers under section 7(4) of the Regulation.

B.8 Documentation and Public Availability

As a public sector employer and large employer under the Regulation, the Division documents its accessible employment measures, policies and practices — including this Policy, its Return to Work policy, and its training log — and makes the documentation:

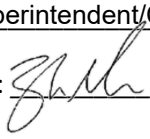
- publicly available on the Division website (interlakesd.ca/accessibility-plan); and
- available in an accessible format upon request, at no cost, through Human Resources or the Division's general accessibility contact.

Approval

This Policy was approved by:

Name: Tyler Moran

Title: Superintendent/CEO

Signature: 

Date: November 9, 2026