MODC Operating Policy

Policy Name:	Program/Department:	Issue Date: *(month, year)*
Employment Accommodation Policy	People & Culture	**Original Issue Date:** February 2023 **Last Revised:** February 2026

1. Introduction/Objective:

This Policy forms part of our commitment to create an inclusive workplace and enhance our understanding of the organizational barriers to accessibility. March of Dimes Canada (MODC) is committed to employment and volunteer accessibility for our people who may have or acquire a temporary or permanent disability. The Policy outlines how MODC will respond to accessibility and disability accommodation, guided by our shared aspiration to champion equity and empower ability.

2. Policy Statement

MODC is committed to ensuring that our People (volunteers, employees, contractors and students), who experience barriers in their work environments due to an accessibility need are reasonably accommodated up to the point of undue hardship. Our People are encouraged to seek accommodation where they believe that they are experiencing a barrier in their work environment related to accessibility and which may be reduced or eliminated through reasonable accommodation.

Our People have the right to seek assistance from the applicable provincial human rights bodies and/or their Union representative, if they are a member of a Bargaining Unit, even when actions are being taken under this Policy.

Job and volunteer candidates will be notified via job postings that MODC welcomes applications from qualified individuals that reflect the abilities and diversity of the populations we serve and that upon request and in collaboration with the requestor, MODC will provide accessibility solutions during all stages of the hiring process.

New employees/volunteers and students will be notified about MODC's policies related to accessibility and accommodation during onboarding.

Our People with disabilities may request accommodation to participate in any activity during the employee/volunteer life cycle, i.e., onboarding, learning and development, performance management, job changes and promotions, recognition, benefits, etc

3. Policy Principles

The following principles will guide accommodations:

- All accommodations will be assessed and delivered on an individual, case-by-case basis for persons who make their needs known. Each request will be considered individually and facilitated in a timely manner.
- All parties share in the responsibility for compliance in good faith with this Policy.

- MODC will work to ensure that approved accommodations are implemented in a manner that supports our People's dignity, focuses on their ability to be fully successful in the workplace and protects their right to privacy.
- All information relating to a request for accommodation, including supporting documentation, will be treated as strictly confidential, and will not be disclosed to other persons without the consent of the person requesting the accommodation. Without limiting the above, an employee's medical information will be received and managed only by designated individuals within the People and Culture Department.
- The collection, use and disclosure of personal and or medical information will be guided by MODC's Information Privacy Policy.

MODC accommodations will be supported through a central fund, administered by People and Culture.

4. Application

The Policy applies to any MODC employee, student, contractor, or volunteer with a disability, and to applicants that may require accommodation during the selection process at MODC.

5. Definitions

Accessibility refers to the design of products, devices, services, activities, systems or environments to support participation/engagement by individuals living with a disability. Building accessibility into all aspects of the employee or volunteer life cycle can reduce barriers, i.e., the need for individual accommodation and enhance inclusion for all.

Accommodation (Disability) is an adaptation or adjustment to a device, service, benefit, policy, system, space, etc., that may be required to enable engagement/participation of an individual living with a disability. When an employment or volunteer related activity is not accessible, an accommodation serves to eliminate a barrier for the individual requesting accommodation. Accommodations may include, but are not limited to:

- human support services such as sign language interpreters, service animals, support attendants;
- technical aids and devices and adaptive technologies;
- workstation or office alternations;
- job redesign/modification;
- reassignments and alternative jobs;
- flexible or alternative work schedules; and
- temporary rehabilitative assignments.

See *Understanding the Duty to Accommodate in Employment based on Disability* for more information.

Assistive Device is a tool used to assist persons with disabilities in carrying out or accessing activities.

Barriers include attitudes and/or designs that prevent people from fully participating in employment. Systemic barriers are formal or informal policies, practices or rules which when applied in the same way to everyone, may have the effect of excluding or restricting the participation of individuals with a disability.

Dignity refers to respecting and treating every person including persons living with a disability as valued and as deserving of effective and full access to employment, services, etc.

Disability means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment—or a functional limitation—whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society

Inclusion/inclusive are terms used to describe programs, policies, systems, facilities, services, etc. that are designed and administered to foster the full integration of diverse individuals and groups.

Independence refers to freedom from control or influence of others, to exercise choices.

Service Animals are animals that are used by a person living with a disability. Examples of service animals include dogs used by people who are blind, hearing alert animals for people who are deaf, deafened or hard of hearing, and animals trained to alert an individual to an oncoming seizure and lead them to safety.

Support Person is an individual hired or chosen by a person living with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services.

Undue Hardship refers to the extent to which one must attempt to accommodate those who have demonstrated that accommodation is required. Undue hardship generally involves excessive interference with the business operation or bona fide health and safety risks. Where undue hardship can be demonstrated, accommodation may be denied.

6. Roles and Responsibilities

Every employee, student, contractor or volunteer of MODC is responsible for providing visible support and commitment to this Policy and its objectives. The Board of Directors, Executive, Senior Management Team, and managers recognize that they bear special responsibility in ensuring that their actions are in alignment with this Policy.

An employee, student, volunteer requesting accommodation should advise their manager of their need, where feasible, in writing and will be responsible for:

- Providing information about their need, restrictions, or limitations.
- Where specialized information is necessary to understand an accessibility need, providing information from health care providers to Health Safety and Wellness who will clarify restrictions to the department/manager. Participating in discussions regarding possible accessibility solutions.
- Cooperating with experts who may be required to explore the request to facilitate an accessibility solution.

- Complying with a Documented Accommodation Plan.
- Notifying the manager immediately of any change in circumstances that affects the accommodation plan.

Any employee represented by one of MODC's bargaining units, has a right to be represented/ supported by their Union in the accommodation process.

Managers who receive requests for accommodation will be responsible for:

- Ensuring this policy is consistently and fairly applied.
- Accepting the request for accommodation in good faith unless there is objective evidence to dispute the request.
- Exploring options with subject matter experts as necessary and considering accommodation solutions to the point of undue hardship.
- Maintaining the confidentiality of all information.
- Implementing the Documented Accommodation Plan and, where appropriate, the Emergency Response Plan.
- Facilitating the integration of the employee, student or volunteer being accommodated and providing a supportive work environment.
- Reporting accommodation requests/solutions to the People & Culture team for tracking purposes.
- Privately, supportively canvassing accommodation where performance has changed, even if not requested.

The People & Culture team will play a coordination role in any request for accommodation including:

- Ensuring the policy is applied in a way that promotes MODC's vision and commitment to a psychologically safe, accessible, and inclusive work environment for all.
- Liaising with medical professionals to obtain expert opinions or advice where more detailed information is needed to meet the accessibility need.
- Accessing MODC's internal expert resources where necessary to support an accommodation
- Clarifying restrictions with management.
- Facilitating the development of a Documented Accommodation Plan and Emergency Response as appropriate.
- In partnership with the manager, advising that a requested accommodation is declined and, where appropriate exploring alternative measures to foster inclusion.
- Maintaining the confidentiality of all information and ensuring that confidentiality is maintained by any third party who may be called on for support.
- Receiving and tracking requests for accommodation and actions taken.

- Advising job or volunteer candidates via job postings and selection documents, i.e., interview, assessment invitations, etc., that accommodation will be provided to those who request it in all phases of the hiring process.
- Investigating employee, student or volunteer complaints alleging failure to accommodate.
- Administering MODC's central Employment Accommodation Fund.
- Developing Return to Work plans.
- Providing training in accordance with provincial human rights accommodation obligations and accessibility legislation.

Unions have positive responsibility to cooperate in the accommodation process and work with MODC to address barriers in collective agreements

7. Contacts and Other Resources:

- For more information about this policy, employees may speak with their senior manager or director, or contact or the People & Culture Business Partner and/or Chief People Officer.
- Our people can also seek confidential advice and support at PeopleAndCulture@marchofdimes.ca or healthandsafety@marchofdimes.ca (People & Culture Department)

The following are reference documents and resources that provide additional information available to employees online in the MODC Policies & Procedures Library:

- Employment Accommodation Workflow chart
- Leader Guide to MODC's Accommodation Process
- Guide to MODC's Accommodation Process for Job Applicants, Employees, Students and Volunteers living with a Disability

Our People without access to SharePoint can email kjeffreys@marchofdimes.ca for a copy.

Documents can be made available in alternative formats and/or with communication supports upon request. Please contact policy@marchofdimes.ca to let us know your needs. We will work with you to provide the information in a way that is accessible for you in a timely manner.