HUMAN RESOURCES

Employee Accommodation Policy

1. Purpose

St. Mary's University (the "University") is committed to upholding the dignity of employees and removing barriers to their participation in and contribution to the workplace. This policy establishes a fair, respectful, and timely process for providing reasonable workplace accommodation in accordance with the *Alberta Human Rights Act*.

2. Scope

This policy applies to all University employees in the course of their employment.

3. Definitions

3.1. Accommodation - a reasonable adjustment to a workplace rule, standard, policy, practice, or physical environment that removes or reduces a barrier related to a protected ground. The University and the employee work together to identify and discuss reasonable options. The University considers the employee's preferred option and may implement another reasonable option that meets the employee's accommodation needs.

3.2. Accommodation Plan - the written record of the approved accommodation measures, who is responsible for implementing them, when they begin, and any applicable review or end dates**.**

3.3. Bona Fide Occupational Requirement - a work requirement that is rationally connected to the duties of the position, adopted in good faith, and reasonably necessary because the University cannot accommodate the employee without undue hardship.

3.4. Employee - any individual employed by the University, including faculty members and administrative employees.

3.5. Leader - the individual to whom the employee directly reports.

3.6. Protected Ground - a personal characteristic protected from discrimination in employment under the *Alberta Human Rights Act*, including race, religious beliefs, colour, gender, gender identity, gender expression, physical disability, mental disability, age, ancestry, place of origin, marital status, source of income, family status, and sexual orientation.

3.7. Undue Hardship - the point at which a particular accommodation would create significantly onerous conditions for the University. It shall be assessed on a case-by-case basis using evidence relevant to the circumstances, which may include substantial cost, serious disruption to operations, or serious health and safety risks.

4. Principles

4.1. The University shall provide reasonable workplace accommodation for needs related to a protected ground up to the point of undue hardship.

4.2. The University shall assess accommodation needs individually and consult with the employee to identify reasonable options.

Approval Authority	Responsible Office	Effective Date	Date Last Revisited	Review Frequency
President's Council	**Vice President Human Resources**	**November 19, 2026**		**Every 5 years**

4.3. The University and the employee shall cooperate in assessing and implementing accommodation. Where circumstances reasonably suggest an employee may need accommodation, the leader shall consult Human Resources and raise the matter privately and respectfully with the employee.

4.4. The University shall protect the confidentiality of accommodation information in accordance with applicable privacy legislation and University policy. Employees may request accommodation, participate in the process, or raise concerns without fear of reprisal.

Appendix A: Procedures for Requesting, Assessing, Implementing, and Reviewing Accommodations

Procedures:

1. Requesting Accommodation
   - 1.1. An employee who needs accommodation for a workplace barrier related to a protected ground may make a request to the Director of Human Resources or their direct leader. A leader who receives a request shall refer it promptly to the Director of Human Resources.
   - 1.2. When an employee requests accommodation or the circumstances reasonably suggest that an employee may need accommodation, Human Resources shall discuss the workplace barrier and accommodation needs with the employee. During the assessment, Human Resources shall consider whether interim measures are appropriate.
   - 1.3. Employees are expected to participate in the accommodation process in good faith, provide information reasonably needed to assess their accommodation needs, and advise Human Resources of changes that affect those needs or an existing accommodation.

2. Assessing Accommodation Options
   - 2.1. Human Resources may request supporting information where reasonably necessary to assess an accommodation request. For disability-related requests, this may include documentation from an appropriate health care professional describing the employee's work-related abilities, restrictions or limitations, and the anticipated duration of any restrictions or limitations, where known. A diagnosis is generally unnecessary. When requesting medical documentation, Human Resources shall provide the employee with the relevant job duties to share with their health care professional. Employees shall submit supporting documentation directly to Human Resources.
   - 2.2. Where the available medical information does not clearly establish the employee's work-related abilities, restrictions or limitations, Human Resources shall first consider whether clarification from the employee's health care professional or another less intrusive option can resolve the issue. If a material question remains, Human Resources may request an independent medical examination where reasonably necessary to resolve it. If an examination is requested, Human Resources shall explain the reasons for and scope of the examination in writing and consult the employee about the selection of a qualified examiner.
   - 2.3. Human Resources shall assess the employee's accommodation needs individually and work with the employee and their leader to identify reasonable accommodation options. In assessing each option, Human Resources shall consider the employee's needs and preferences, the duties of the position, the work environment, and how effectively the option would address the workplace barrier. The employee and the University shall work together to implement a reasonable accommodation that meets the employee's needs. The accommodation may differ from the option the employee initially proposed or preferred. It may be temporary or ongoing and may be adjusted as the employee's needs or workplace circumstances change.
   - 2.4. Before the University declines a request on the basis of undue hardship or a bona fide occupational requirement, Human Resources shall document the evidence and accommodation options considered and refer the proposed decision to the Vice-President responsible for Human Resources for approval.
   - 2.5. The employee shall be responsible for the reasonable cost of medical documentation requested. The University will arrange and pay for any independent medical examination or functional capacity evaluation it requires to assess a workplace accommodation request. The assessment will be limited to the information reasonably necessary to assess the employee's work-related abilities, restrictions, and accommodation needs.

3. Confirming and Implementing Accommodation
   3.1. After working with the employee and their leader to explore accommodation options under section 2.3, the Director of Human Resources shall review the options and confirm the outcome of the request.
      3.1.1. If the review leads to a recommendation to decline the request on the basis of undue hardship or a bona fide occupational requirement, the approval process in section 2.4 applies. If the decision to decline is approved, Human Resources shall notify the employee in writing and explain the reasons for the decision.
      3.1.2. If the University approves an accommodation, Human Resources shall provide the employee and their leader with a written Accommodation Plan. The plan shall specify the approved measures, who will implement them, when they will begin, and any applicable review or end dates. The employee and their leader shall acknowledge receipt of the plan.
   3.2. The leader shall implement the approved measures with support from Human Resources. The University shall cover the cost of any assistive devices, equipment or workplace modifications required under the approved Accommodation Plan.
   3.3. Human Resources shall maintain accommodation records securely. Leaders shall receive the information they need to implement the accommodation. Access to supporting documentation shall be limited to authorized individuals who need it to carry out their responsibilities.

4. Reviewing Accommodation
   4.1. Human Resources shall review the accommodation with the employee and leader at the agreed review date or when the employee's needs, duties, or work environment change. Human Resources shall confirm any changes in writing.
   4.2. An employee may ask Human Resources to reconsider an accommodation decision or address a concern about how an accommodation is being implemented. Human Resources shall review the matter promptly, follow the applicable steps in sections 2 and 3 of these Procedures, and communicate the outcome and reasons to the employee.