



Human Rights Policy (Accommodation)

Intent

Forward House of London recognizes and abides by its obligations under the *Human Rights Code*. As part of these obligations, the organization provides accommodation up to the point of undue hardship for needs arising from the prohibited grounds of discrimination under the *Human Rights Code*. This policy outlines the accommodation process and the responsibilities of different parties in that process.

Definitions

Bona fide occupational requirement (BFOR): Job requirements that are adopted for a purpose or goal that is rationally connected to the functions of the position; adopted in good faith, in the belief that they are necessary to fulfil the purpose or goal; and are reasonably necessary to accomplish the purpose or goal.

Disability: Includes any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect or illness, a condition of mental impairment or developmental disability, a learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language, a mental disorder, or an injury or disability for which benefits were claimed or received under the *Workplace Safety and Insurance Act, 1997*.

Family status: Being in a parent and child relationship.

Marital status: The status of being married, single, widowed, divorced, or separated, and includes the status of living with a person in a conjugal relationship outside marriage.

Record of offences: A conviction for an offence for which a pardon has been granted under the *Criminal Records Act* (Canada) and has not been revoked, or an offence regarding a provincial enactment.

Undue hardship: Occurs when providing an accommodation would cause significant, onerous conditions for the company. Considerations when determining whether the company has reached the point of undue hardship include cost considerations, outside sources of funding if any, and health and safety requirements.

Guidelines

Forward House of London provides accommodation for individuals up to the point of undue hardship where processes or work must be modified or adjusted to address the needs of the individual based on a prohibited ground of discrimination under the *Human Rights Code*. The prohibited grounds of discrimination are:

- Race;
- Ancestry;
- Place of origin;
- Colour;
- Ethnic origin;
- Citizenship;
- Creed;
- Sex (including pregnancy);
- Sexual orientation;
- Gender identity;
- Gender expression;
- Age (over 18 years of age);
- Record of offences;
- Marital status;
- Family status; and
- Disability.

Forward House of London takes allegations of discrimination seriously, and it takes appropriate action to address them promptly. Individuals are not subject to reprisal for making complaints regarding their human rights.

The company does not condone or tolerate harassment in any form. If any employee has been subject to work-related harassment based on a prohibited ground of discrimination, including sexual harassment, this should be reported to their direct manager and will be investigated in accordance with the Forward House policy and procedure- Violence and Harassment in the Workplace.

- Forward House of London may use artificial intelligence tools for internal human resources activities. The company acknowledges that these tools may introduce biases, stereotypes, or impermissible consideration of characteristics protected under the *Human Rights Code*, either inherently or as a result of information they receive and learn from. The company takes steps to screen for and eliminate biases that arise from the use of these tools, including completing periodic audits. To the extent possible, the company verifies and validates the results produced by these tools. Forward House of London takes steps to protect the confidentiality of information entered into artificial intelligence tools, including removing personal information as necessary. In all instances, Forward House of London follows its privacy policy and the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#).

Accommodation is available from the beginning of the recruitment and selection process. Applicants are informed that accommodation is available upon request.

The accommodation process may begin in one of three ways:

- An employee or job applicant requests accommodation;
- Forward House becomes aware that an accommodation may be required; or
- An authorized third party requests accommodation on behalf of an employee or applicant.

Requests for accommodation should be submitted to their direct manager. These requests do not require the individual to identify or disclose personal details beyond what is necessary for the accommodation request. The company takes all requests for accommodation seriously and responds in a timely manner. Individuals who request

accommodation are not subject to any reprisal or threat of reprisal for making such a request.

Where a manager becomes aware that an accommodation may be required, the duty to inquire is engaged. A private meeting is held with the employee to determine whether there are any unmet needs related to a prohibited ground and whether accommodations are necessary.

Accommodation Process

Once the need for accommodation is identified, the hiring manager consults the employee or applicant to determine what type of accommodation is needed and develops an individual accommodation plan. Interim accommodation measures may be provided at the discretion of the organization while formal accommodations are being developed and implemented.

Information beyond what was provided in the initial accommodation request may be required to determine appropriate accommodations; however, only information that is necessary to confirm and arrange the accommodation is requested. Employees are expected to cooperate in the accommodation process and provide any information required to support the accommodation request in a timely manner.

Medical Information

Where accommodation is requested because of limitations to an employee's functional abilities, Forward House of London may require employees to provide medical information to identify an appropriate accommodation. Employees are not required to disclose diagnostic information. Medical information required by the company is limited to details of how the employee's work-related functional abilities are affected by a medical condition. Medical information must be provided by the employee's qualified treating healthcare professional, such as a doctor or nurse practitioner.

Where a healthcare professional requires a fee for completing a functional abilities form or letter at the company's request, the fee must be communicated to and approved by the hiring manager before the form or letter is completed. Forward House will reimburse the employee or, remit the required fees directly to the healthcare professional.

Forward House may request the employee undergo an evaluation by a medical or other expert, paid for by the company, to assist the company in determining whether accommodation can be provided. Employees are expected to participate in the evaluation where requested.

Communication with Healthcare Professionals

Forward House will communicate directly with the employee and expects the employee to communicate with their own healthcare professional. Employees are responsible for ensuring medical documentation necessary for accommodation is completed by their healthcare professional and provided to their direct manager.

Individual Accommodation Plans

An individual accommodation plan is created in collaboration with the employee's direct manager, the individual who requires accommodation, any applicable healthcare

professionals, and third-party experts as required. The employee may request that a person knowledgeable in workplace accommodation or a union representative participate in the development of the individual accommodation plan. Accommodations may be temporary or permanent based on the needs of the individual.

Forward House examines all options and proposes reasonable accommodation that provides equal opportunity, benefits, and privileges to what others experience, that is inclusive, and that respects dignity and individual needs of the employee or candidate. The accommodation provided may not necessarily be the individual's preferred accommodation, but their preferences are taken into consideration. Where the organization cannot provide full accommodation, the organization may be able to provide partial accommodation.

Forward House will make every reasonable effort to accommodate employees in their current position. Where all options for accommodation have been exhausted in their current role, employees may be offered an alternate or comparable role if one exists.

If the organization proposes an accommodation and the employee has concerns that it will not meet their needs, they should immediately inform their union representative. Further discussions may be held if reasonable concerns are raised. If an employee cannot identify their concerns about the accommodation or declines a reasonable offer of accommodation proposed by Forward House, the organization has fulfilled its duty to accommodate and is not obligated to provide an alternative option.

Once the proposed accommodation is agreed upon, the accommodation plan is documented in writing and signed by both the individual requesting accommodation and the union. A copy of the plan is provided in an accessible format upon request. Employees are expected to comply with their accommodation plan and work in accordance with its provisions.

BFORs and Undue Hardship

Forward House of London cannot provide accommodation for bona fide occupational requirements. If the company cannot accommodate an individual's needs without experiencing undue hardship or due to a BFOR, Forward House will explain its reasoning to the individual employee in writing.

Review and Update

Accommodation plans are reviewed, and updated if necessary, every two years, or whenever the employee's workspace changes, their responsibilities change, or when Forward House becomes aware of any other changes that may affect the accommodation. The review is completed in collaboration with the same parties involved when it was established.

Forward House recognizes that accommodation needs may change over time or require adjustment. Individuals on an accommodation plan should inform the company as soon as reasonably possible if their needs change or if their accommodation is not working effectively so that adjustments can be made. Individuals must inform their direct manager if accommodation is no longer required.

Privacy

All information gathered related to the accommodation process, including the employee's personal information and person health information, is kept confidential and shared only as necessary to provide the accommodation. This information is protected in accordance with Forward House Privacy policy. It is collected, used, and disclosed only to the extent necessary determine appropriate accommodations and only by employees who are directly involved in preparing the employee's accommodation plan.