

Environmental Health

Workplace Accommodation Guide for Multiple Chemical Sensitivity (MCS)



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Introduction:

Multiple Chemical Sensitivity (MCS) is a condition characterized by heightened sensitivity to various chemical substances that are usually tolerated by most people. People with MCS can experience adverse reactions triggered by chemicals and volatile organic compounds (VOCs) that emanate from everyday products such as perfumes and perfumed products, and those used for personal, cleaning and maintenance purposes, including furniture, furnishings, pesticides, smoke, building materials, office supplies and printing ink. These exposures can lead to debilitating symptoms, in many body systems and can include respiratory problems, fatigue, dizziness, cognitive difficulties, and eye and skin irritation. Managing MCS requires eliminating exposure to triggers and creating a healthy environment conducive to well-being. This depends on choices of appropriate products that are fragrance-free, non- to least-toxic, do not release VOCs or contain masking agents, implementing ecological strategies (for all purposes such as renovations, biological pest control, and a plan for mold vigilance, ecological lawn, and garden care), maintaining air filtration systems, and establishing a fragrance-free policy for the establishment.

Statistics Canada (CCHS, 2020) reports that over 1.13 million people have a diagnosis of MCS, of which 72% are women and close to 50% are over the age of 55. Similar data from 2015-2016 shows that 40% of people with MCS are not employed and over 41%, whether employed or not, earn below \$20,000 annually. Women with MCS are affected more, with around 45% of women not working, compared with 28% of the general population. In addition, almost half of the women with MCS and not working have a post-secondary diploma or university degree.

In Canada, the Canadian Human Rights Act plays a crucial role in ensuring workplace equality and protecting individuals with disabilities, including those with MCS. This legal framework mandates that employers provide reasonable accommodations to eliminate barriers that individuals with disabilities may face in the workplace.

The duty to accommodate under the Canadian Human Rights Act requires employers to take proactive steps to identify and address potential triggers that could exacerbate conditions like MCS. This includes collaborating closely with affected individuals to develop accommodation strategies that effectively support their health and well-being while allowing them to fully participate in the workplace. This approach promotes workplace equity by recognizing and respecting the diverse needs of employees, ultimately enhancing productivity, morale, and retention.

The <u>Canadian Human Rights Commission</u> recognizes MCS as a disability and provides tools for employers on workplace accommodation for MCS (1). The <u>Canadian Centre for Occupational Health and Safety</u> outlines best practices for a scent-free policy in the workplace (2).



Purpose and Scope of the Guide:

The purpose of this guide is to establish comprehensive policies and practices that support employees with MCS and promote a healthy indoor environment for all staff. Recognizing the critical link between environmental health and workplace productivity, the guide emphasizes the importance of maintaining high indoor air quality. Clean air not only supports physical health but also enhances cognitive function, concentration, and overall job performance among employees (3-7).

Challenges Faced by Employees with MCS

Incorporating accommodations for employees with MCS is vital for ensuring a truly inclusive workplace. MCS is a condition that can make everyday work environments challenging due to sensitivity to various chemicals that emanate from scents. Without appropriate accommodations, individuals with MCS may face significant challenges in their ability to work effectively and maintain employment. To fully understand these challenges, it is important to consider the specific barriers faced by employees with MCS.

- 1. Diagnosis and Medical Support: Many individuals with MCS struggle to obtain a formal diagnosis. This challenge arises from limited awareness of the condition among healthcare providers and the scarcity of specialists in environmental health. Consequently, individuals may face challenges in acquiring a diagnosis which may be necessary to obtain workplace accommodations. The video titled 'Understanding and Accommodating Employees with Multiple Chemical Sensitivity (MCS) in the Workplace' can help employers navigate this barrier to inclusion.
- 2. Employment Barriers: Employees with MCS may be significantly affected by common workplace triggers such as scented cleaning products, air fresheners, and VOCs from new furniture or building materials. These triggers can lead to severe symptoms, including headaches, respiratory issues, fatigue, and cognitive difficulties, making it challenging for individuals to perform their duties effectively. This contributes to a higher unemployment rate among individuals with MCS compared to the general population. Without appropriate accommodations, maintaining employment can become exceedingly difficult, leading to economic and social disadvantages.



Importance of Environmental Health in the Workplace:

Maintaining optimal environmental health in the workplace is essential for several reasons:

- Employee Well-Being: Clean air and a reduced presence of chemical irritants contribute to the overall well-being of employees. By eliminating exposures that can exacerbate MCS symptoms, employers foster a supportive and inclusive workplace environment.
- **Productivity and Performance:** Good indoor air quality has been shown to enhance productivity and cognitive performance. Employees in environments with reduced pollutants and allergens are less likely to experience fatigue, distraction, or discomfort, allowing them to focus more effectively on their tasks.
- Retention and Recruitment: A commitment to environmental health and accommodations for MCS can enhance employee satisfaction and retention. It also demonstrates an employer's commitment to diversity, equity, and inclusivity, which can attract talented individuals who value a supportive workplace culture.
- Legal Compliance and Ethical Responsibility: Ensuring a healthy indoor environment not only complies with legal obligations under disability rights legislation but also fulfills ethical responsibilities to provide a safe and respectful workplace for all employees.

By prioritizing environmental health and accommodating individuals with MCS, employers not only meet legal requirements but also create a workplace where all employees can thrive. This guide serves as a roadmap for implementing effective policies and practices that support a healthy indoor environment and promote the well-being of everyone in the workplace.

Workplace Accommodation Guide

The following guide outlines workplace policies designed to accommodate individuals with Multiple Chemical Sensitivity (MCS). By implementing these policies, workplaces can promote awareness, provide necessary support, and ensure the well-being of employees and visitors with MCS.

1. Scent-Free Policy

A scent-free policy is a workplace guideline for the entire office space and not just part of it, that not only restricts the use of fragrances and scented products, but also depends on



appropriate product choices, (i.e., products that are non to least-toxic, do not release VOCs, or contain masking agents), to create an environment free from potentially harmful odors and chemicals. This specification outlines the accessibility measures for this Multiple Chemical Sensitivity (MCS). This policy applies to all individuals within the workplace, including employees, visitors, vendors, and contractors. To provide accessibility and inclusion in the workplace for MCS, adherence to a scent-free policy is crucial for maintaining their health, well-being, and employment.

- Scope of Prohibited Products: The policy encompasses all scented products, including perfumes, colognes, aftershaves, scented deodorants, shampoos, conditioners, hair products, lotions, essential oils, soaps, scented laundry detergents, fabric softeners, and dryer sheets. Employees and visitors are required to abstain from using these products both before arriving at work and throughout the duration of their workday.
- Vendor and Contractor Compliance: To uphold the scent-free environment, it is
 imperative to ensure that vendors and contractors hired by the company are fully
 aware of and adhere to the policy. Relevant clauses should be included in contracts
 and agreements to enforce compliance with these guidelines.
- Awareness and Precautionary Measures: Employees and visitors are encouraged
 to exercise mindfulness and caution regarding their surroundings. This involves
 avoiding areas where they may encounter scented products before arriving at work,
 such as pharmacies, gyms, salons, or public spaces known for prevalent fragrance
 usage.
- Guiding Product Choices: To support compliance with the policy, the organization must promote the critical importance of product choice in maintaining a scent-free environment. Opting for fragrance-free alternatives for personal care products, cleaning and office supplies, and other commonly used items in the workplace is essential to help mitigate the risk of triggering allergic reactions or sensitivities among employees, visitors, and individuals with MCS. To support compliance with the policy, the organization should provide information and resources on fragrance-free alternatives for personal care products, cleaning supplies, and other commonly used items in the workplace. This includes referencing resources like the EcoLiving Guide (8) to facilitate the transition to fragrance-free options.
- Greenwashing: This practice has become increasingly common as more people seek healthier solutions but are misled by product appearances. Greenwashing occurs when companies use logos, packaging colors, or other marketing tactics to give the illusion of environmental responsibility or health benefits, while their products may still contain harmful chemicals. For individuals with MCS, greenwashing can be particularly problematic. For example, "masking agents" are



- often used to hide the scent of chemicals, but this does not prevent them from triggering symptoms since MCS is not simply an "odor" sensitivity; the hidden chemicals still pose a risk. To avoid falling for greenwashing, it's important to carefully read labels and rely on trusted, certified EcoLogos.
- Enforcement Procedures: In the event that an individual arrives at the workplace
 wearing scented products, immediate action must be taken to uphold the scent-free
 environment. They should be reminded of the organization's policy and instructed to
 wash and change their clothes. If this is not feasible, the individual may be required
 to leave the premises to ensure the maintenance of a scent-free environment
 conducive to the well-being of all employees.
- Meeting rooms and Visitor Notification: All meeting rooms and common areas
 within the workplace are designated as scent-free zones with appropriate signage.
 Visitors and employees must refrain from using scented products while on the
 premises. This policy is communicated through letterheads, voicemails, and the
 company website, emphasizing that the workplace is scent-free.
- Job Applicants Notification: All job applicants will receive notification of the scentfree building policy in the employment posting. They will be instructed to refrain from using scented products when preparing for and attending job interviews, ensuring adherence to our workplace standards.

2. Indoor Air Quality Control

Maintaining high indoor air quality is essential for creating a healthy and productive workplace environment. Here's a detailed breakdown of the measures organizations can implement to control indoor air quality effectively. It is important to note that while ventilation is useful, it is not a substitution for an appropriate product choice. In other words, dilution of pollution is not a solution.

• Installation of HEPA Filters: High-efficiency particulate air (HEPA) filters are highly effective at capturing airborne particles and allergens, including dust, pollen, pet dander, and mold spores. Installing HEPA filters in ventilation systems ensures that these contaminants are removed from the air, promoting cleaner and healthier indoor air quality. Regular maintenance and replacement of HEPA filters are essential to ensure optimal performance. Filters should be inspected and replaced according to manufacturer recommendations to prevent the buildup of contaminants and maintain efficient air filtration.



- Portable Air Purifiers: In addition to centralized ventilation systems, organizations can provide portable air purifiers equipped with carbon filters free from any plastic components in workspaces, particularly in areas where employees with sensitivities are located. These air purifiers offer targeted filtration, removing airborne pollutants and allergens from the surrounding air. It's crucial to ensure that air purifiers are appropriately sized for the space they serve to maximize their effectiveness. Regular maintenance, including filter replacement and cleaning, is necessary to uphold optimal air purification performance.
- Individual Accommodations: In addition to appropriate air filters, individuals requiring accommodation will be allocated private cubicles with doors, allowing them personal control over their environment. Ideally, these spaces are equipped with windows for natural ventilation, further enhancing comfort and air circulation.
- Encouragement of Natural Ventilation: Where feasible, and if away from pollution such as traffic or industry, organizations should promote natural ventilation by providing openable windows that allow for the circulation of fresh outdoor air. Natural ventilation helps dilute indoor pollutants and improves overall indoor air quality. Employees should be encouraged to utilize windows to ventilate their workspaces, particularly during mild weather conditions. Weather permitting, opening windows can enhance indoor air circulation and provide a refreshing influx of outdoor air, contributing to a healthier and more comfortable work environment.
- Regular Ventilation System Maintenance: Schedule regular inspections and
 maintenance of ventilation systems to ensure they are operating efficiently. Clean
 ducts, vents, and filters regularly to prevent the buildup of dust, mold, and other
 contaminants that can compromise indoor air quality. Do not use any pesticides or
 chemicals in the ducts after cleaning; if they must be used, natural non-toxic
 products are available.
- Humidity Control: Maintain indoor humidity levels within the optimal range (ideally between 30% to 50%) to prevent the growth of mold and mildew. Use dehumidifiers in areas prone to high humidity and humidifiers in dry environments to achieve optimal moisture balance.
- Regular Indoor Air Quality Assessments: Conduct periodic indoor air quality
 assessments and employee surveys to gauge satisfaction levels and identify any
 emerging concerns or areas for improvement. Use feedback from assessments to
 refine and optimize indoor air quality control strategies.



Building Materials and Furnishings

Careful selection of building materials and furnishings is essential for promoting indoor air quality and creating a healthy workplace environment. Here's a detailed breakdown of strategies to ensure that building materials and furnishings contribute to optimal indoor air quality:

- Low-VOC Building Materials: Prioritize the use of building materials that have low VOC emissions, as VOCs can off-gas from products such as paints, adhesives, sealants, and composite wood materials, contributing to indoor air pollution. Choose products labeled as low-VOC or zero-VOC to minimize the release of harmful chemicals into the indoor environment.
- Off-Gassing Mitigation: Allow new materials and furnishings sufficient time to offgas before installation or use in occupied spaces. Off-gassing refers to the release of VOCs from materials and products into the surrounding air. Proper ventilation of the area, both during and after installation, helps facilitate the dissipation of initial emissions, reducing potential indoor air quality issues.
- Flooring Selection: Opt for hard flooring options such as tile and hardwood over carpeting whenever possible. Hard flooring materials are easier to clean and maintain and do not trap dust, allergens, or chemicals as readily as carpeting. If carpets are necessary, prioritize low-pile or tightly woven carpets made of natural materials such as wool or cotton. These carpets are less likely to harbor allergens and are easier to clean effectively. Select carpets with low or no VOC emissions to minimize indoor air pollution, and implement regular cleaning and maintenance practices to preserve indoor air quality.
- Furniture and Furnishings: Choose furniture and furnishings made from lowemission materials such as solid wood, metal, or recycled materials. Avoid furniture with composite wood products that may contain formaldehyde or other harmful chemicals. Upholstered furniture should be free of <u>Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS)</u> and constructed with low-VOC or formaldehyde-free adhesives and finishes (9).
- Material Selection: The selection of renovation materials and furnishings shall be made in consultation with individuals with MCS. Their input and preferences shall be considered in the decision-making process to ensure that chosen materials are compatible with their needs and do not exacerbate symptoms. Written permission will be required for introducing or replacing any new products to ensure that any new materials align with sensitivities and preferences.
- Notification of Renovations: Prior to the commencement of any renovation projects, employees with MCS and those affected by the renovations shall be notified



in advance. Notification should include details of the scope of the renovations, expected duration, and any potential impacts on the work environment. Employees directly affected by renovations, particularly those with MCS, shall be given the option to work remotely from home for the duration of the renovations.

- Duration of Remote Work: Employees opting to work remotely during renovations shall be granted a minimum period of one week. Additional arrangements may be made on a case-by-case basis, depending on the nature and duration of the renovations and the individual's needs.
- Communication and Updates: Regular communication shall be maintained throughout the renovation process to keep employees informed of progress, any changes to the schedule, and any potential impacts on the work environment.
 Employees shall be encouraged to provide feedback and raise any concerns related to the renovations.
- Monitoring for Leaks and Roof Maintenance: Establish a rigorous plan for monitoring and maintaining the building to prevent leaks and ensure the safety and comfort of all occupants. Regular inspections should be conducted to detect leaks promptly, focusing on areas such as windows, doors, and roof sections. Roof maintenance procedures should be proactive, involving scheduled inspections and timely repairs to prevent leaks. If a leak is identified, immediate action is taken to address the source. Upon detection, affected areas should be promptly dried, or the damaged material replaced, to prevent mold formation. In cases where mold does develop, affected areas are promptly and appropriately cleaned and ventilated to minimize its spread and ensure a safe environment for all.

4. Cleaning and Maintenance

- Selection of Cleaning Products: Cleaning products chosen for use in the workplace should be carefully selected to be free from fragrances, and allergens, and must be the lowest emission and least-toxic. This selection ensures a safer environment for all individuals, particularly those with MCS.
- Scheduling of Cleaning Activities: Cleaning activities should be scheduled during
 off-hours or times when the fewest employees are present. This minimizes direct
 exposure to cleaning products and allows sufficient time for any residual odors to
 dissipate before employees return to work areas.
- Ventilation After Cleaning: After cleaning, areas are ventilated thoroughly to
 disperse any remaining cleaning product residues and improve indoor air quality.
 Windows are opened where possible, and fans or ventilation systems are utilized to
 facilitate air circulation and ensure a fresh, clean environment.



Dishwashing Considerations: Dishwashing soap used in the workplace must be
eco-friendly, free from fragrances and least-toxic. This ensures that utensils and
dishes are cleaned effectively without leaving residues behind. Dish towels are
washed using eco-friendly, scent-free soap to maintain cleanliness without
introducing additional chemicals.

5. Sound and Lighting

- Natural Light Optimization: Workspaces should be designed to maximize natural light exposure by situating workstations near windows. This approach not only enhances the aesthetic appeal of the workplace but also promotes employee wellbeing by providing access to natural daylight.
- Use of Full-Spectrum Lighting: Full-spectrum lighting, which mimics natural
 daylight, should be selected to reduce eye strain and enhance mood among
 employees. Traditional fluorescent lights should be replaced with LED or other lowemission lighting options to create a more comfortable and energy-efficient lighting
 environment.
- Acoustic Management: Install acoustic panels and ceiling tiles designed to absorb sound throughout the workplace. These materials help reduce noise levels and improve overall acoustic comfort. Implement sound-masking systems to minimize background noise and create a quieter, more focused work environment conducive to productivity.
- Quiet Zones and Rooms: Designate quiet zones or rooms for employees who
 require a low-noise environment to concentrate effectively. These areas are
 equipped with soundproofing materials to minimize disruption from external noise
 sources, ensuring a conducive environment for focused work.

6. Smoke-free Outside the Workplace

- Designation of Smoke-Free Zones: All outdoor areas within the workplace premises, including entrances, outdoor seating areas, and parking lots, are designated as smoke-free zones. This policy aims to promote a healthier environment for all employees and visitors.
- Installation of Clear Signage: Clear and visible signage is installed near building
 entrances and other appropriate locations to remind employees and visitors of the
 smoke-free policy. These signs serve as a visual reminder and reinforce the
 commitment to maintaining a smoke-free workplace environment.



 Implementation of Enforcement Measures: Periodic monitoring of outdoor areas is conducted to ensure compliance with the smoke-free policy. Designated personnel or security staff may perform these checks regularly. Violations of the smoke-free policy are addressed promptly and firmly. Immediate corrective actions are taken, including verbal warnings, documented notifications, and disciplinary measures.

7. Landscaping Practices

- Prohibition of Chemical Pesticide Use: The routine use of chemical pesticides for cosmetic purposes, such as weed control in landscaped areas or insect control on lawns, is strictly prohibited. This policy aims to minimize environmental impact and promote healthier outdoor spaces.
- Approval Requirement for Pesticide Applications: Prior approval from designated
 personnel is mandatory for any pesticide applications. Before approval, consideration
 must be given to non-toxic or least-toxic alternatives. This ensures that pesticide use
 is minimized and only employed when necessary for effective pest management.
 Appropriate signage must be placed in visible areas with the date and type of
 application.
- Embrace Green Landscaping Practices: Green landscaping practices are embraced to prioritize environmental sustainability and reduce reliance on chemical pesticides. This includes planting native species that are naturally resistant to pests and diseases, thereby promoting biodiversity and ecosystem health. Natural grasses resistant to pests and diseases are preferred over species vulnerable to such issues. Chemical fertilizers are prohibited to maintain natural soil health and minimize environmental impact.
- Implementation of Notification Procedures: Robust notification procedures are
 implemented to alert employees of any planned eco or natural pesticide applications
 in outdoor areas. This allows individuals with MCS to take appropriate precautions,
 such as avoiding treated areas, working from home, or using protective measures.
 Employees must be informed of any ongoing pest control activities and provided with
 the Materials Safety Data Sheet (MSDS) with information on the products being
 used, ensuring transparency and awareness.



8. Idling Vehicles Policy

- Implementation of Idling Reduction Policy: Implement an idling reduction policy aimed at minimizing vehicle emissions and enhancing air quality in outdoor areas.
 Communicate the policy clearly to all employees, contractors, and visitors through internal memos, employee handbooks, and signage in designated areas.
- Designation of No-Idling Zones: Specific areas for loading/unloading and employee parking are designated as no-idling zones. These zones are clearly marked and strictly enforce the prohibition of idling to reduce unnecessary emissions.
- **Installation of Clear Signage:** Visible signage should be installed throughout the parking and loading areas to remind drivers to turn off their engines when parked for more than a few minutes. These signs emphasize the importance of reducing vehicle emissions and promoting a cleaner environment.
- Promotion of Sustainable Transportation Practices: Employees are encouraged
 to carpool and utilize alternative transportation options such as public transit, biking,
 or walking to reduce the overall number of vehicles and emissions associated with
 commuting. Incentives may be provided to employees who adopt sustainable
 transportation practices, such as preferred parking for carpoolers or subsidies for
 public transportation passes.
- Monitoring and Compliance: Regular monitoring and enforcement of the idling reduction policy are conducted to ensure compliance with established guidelines. This includes periodic checks and employee education on the benefits of reducing vehicle idling.
- Emergency and Operational Considerations: Exceptions for idling may be permitted in emergency situations or for operational needs where idling is essential for vehicle functionality (e.g., refrigerated trucks or emergency response vehicles). However, efforts are made to minimize idling time whenever possible.

9. Employee Training and Education

Regular Training Sessions: Conduct regular training sessions for all employees
and management to increase awareness and understanding of MCS. These
sessions will educate participants about MCS, its impacts on health and well-being,
and the importance of accommodation in the workplace. Include information on
common triggers, symptoms, and best practices for creating a supportive
environment.



- Confidential Reporting System: Implement a straightforward and confidential
 reporting system designed for employees to report issues or violations related to
 accommodations for MCS. Ensure that the reporting system is accessible, easy to
 use, and maintains confidentiality to encourage employees to come forward with
 concerns without fear of retaliation or stigma.
- Accommodation Request Process: Clearly outline the process for requesting
 accommodations related to MCS in the workplace policy documents and employee
 handbooks. Provide detailed instructions on how employees can submit a request for
 accommodations. Designate a point of contact or a committee responsible for
 reviewing accommodation requests, ensuring transparency and timely responses to
 employees.
- Training Content and Objectives: Customize training content to address MCS
 inclusion relevant to the workplace environment. Objectives of the training should
 include fostering empathy, promoting inclusive practices, and equipping employees
 and management with practical strategies to accommodate and support colleagues
 with MCSs.
- Integration into Workplace Culture: Integrate awareness of MCS and accommodation practices into the overall workplace culture and values. Encourage open dialogue and mutual respect among employees to create a supportive and inclusive environment for all individuals, regardless of their health challenges or sensitivities.

10. Flexibility in Work Arrangements

- Full-Time Remote Work Options: Offer full-time remote work options for employees whose roles can be effectively performed from home. This flexible arrangement supports work-life balance and accommodates health-related needs, including MCS. Establish guidelines and expectations for remote work to ensure productivity, communication, and collaboration among remote teams.
- Encouragement of Schedule Adjustments: Encourage employees to adjust their
 work schedules to avoid peak commuting times, which can reduce exposure to
 environmental triggers such as traffic-related pollution or crowded public
 transportation. Provide guidance on how employees can optimize their schedules to
 minimize potential health impacts while ensuring operational efficiency and team
 collaboration.
- Flexible Leave Options: Offer flexible leave options tailored to support employees managing health-related issues, including MCS. This may include additional sick leave, personal days, or flexibility in using accrued leave for medical appointments or



- wellness breaks. Ensure that the process for requesting and approving flexible leave aligns with company policies and complies with legal requirements, maintaining confidentiality and respecting employees' privacy.
- Technology and Support for Remote Work: Provide necessary technology tools
 and support systems to facilitate remote work, such as secure access to company
 networks, communication platforms, and virtual collaboration tools. Train employees
 and managers in best practices for remote work, including effective communication,
 time management, and maintaining work-life balance while working from home.

11. Accommodation Procedures

- Request Initiation: Employees with MCS may initiate a request for accommodations
 through a designated process established by the company. Clearly outline the
 channels available for submitting accommodation requests, such as through HR
 personnel, an online portal, or a designated accommodation coordinator.
- Review and Evaluation: Establish a review process for accommodation requests to
 evaluate the feasibility and appropriateness of requested accommodations.

 Designate a review committee or accommodation coordinator responsible for
 assessing each request in accordance with company policies, legal requirements,
 and the specific needs of the employee.
- Implementation and Monitoring: Upon approval of accommodations, implement necessary changes promptly and effectively to ensure the employee's needs are met. Monitor the effectiveness of accommodations over time and be prepared to make adjustments as needed based on feedback from the employee and ongoing evaluation.
- Confidentiality and Respect: Uphold strict confidentiality regarding sensitive
 medical information shared during the accommodation request process. Respect the
 privacy and dignity of employees requesting accommodations, ensuring that
 discussions and decisions are handled with sensitivity and professionalism.
- For further information on requesting accommodations, refer to the video "How to Ask for Accommodations" by ASEQ-EHAQ. This video provides detailed guidance on navigating the accommodation request process, including initiating requests, understanding your rights, and communicating effectively (10).



12. Preparedness and Response including Emergency

- Policy Enforcement: Just as is done for other policies such as 'no smoking', etc., clearly define consequences for violations of the scent-free policy to ensure adherence and mitigate potential health risks to individuals. Outline a progressive disciplinary approach for non-compliance, starting with a verbal warning. Specify that subsequent or deliberate violations may result in more severe consequences, such as written warnings, or other disciplinary actions as deemed appropriate.
- Emergency Response Protocol: Develop an emergency response protocol
 outlining immediate actions to be taken in the event of a serious policy violation that
 poses immediate health risks. Designate trained personnel or a response team
 responsible for addressing emergency situations related to policy violations, such as
 contacting emergency services or providing immediate medical assistance if
 necessary. To ensure preparedness in emergencies, it's crucial to maintain an
 appropriate emergency first aid kit. For detailed recommendations on assembling a
 kit that accommodates MCS, please refer to the Emergency First Aid Kit, by ASEQEHAQ (11).
- Support and Monitoring: Establish procedures for monitoring compliance with the scent-free policy. Ensure that employees are informed about the importance of compliance and the potential consequences of non-compliance through ongoing communication and awareness campaigns.
- Documentation and Reporting: Maintain accurate records of policy violations, including the date, nature of the violation, and actions taken in response. Implement a confidential reporting mechanism for employees to report policy violations or concerns without fear of retaliation, ensuring that all reports are investigated promptly and impartially (12).
- **Legal Compliance:** Ensure that all policies and procedures related to emergency preparedness and response align with applicable legal requirements and regulations. Consult legal advisors or experts to ensure that disciplinary actions and enforcement measures are fair, equitable, and compliant with employment laws and regulations.

13. Monitoring and Evaluation

 Feedback Mechanisms: Implement structured feedback mechanisms to gather input from employees who have received accommodations or participated in training sessions related to MCS. Solicit feedback through surveys, focus groups, or confidential feedback forms to assess the effectiveness of education programs, accommodation processes, and overall policy implementation.



- Continuous Improvement: Analyze feedback received to identify strengths, weaknesses, and areas for improvement in training materials, policies, and support mechanisms. Use feedback data to update training materials, refine policies, and enhance support services to better meet the needs of employees with MCS.
- Regular Monitoring: Establish a system for regularly monitoring adherence to the scent-free policy throughout the workplace. The <u>Tip Sheet on Scent/Fragrance-Free</u> <u>Policies</u> outlines best practices for policy enforcement, including posting visible reminders and maintaining confidentiality while
- addressing concerns (13)
- Prompt Action on Violations: Address any policy violations promptly and
 effectively to reinforce the importance of compliance and minimize risks to
 employees with MCS. Provide corrective actions or additional education for
 employees who unintentionally breach the policy, focusing on raising awareness and
 promoting respectful workplace practices.

For further guidance on enforcing scent-free policies, refer to the video <u>"Enforcing a Scent-Free Policy"</u> by ASEQ-EHAQ (14).



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