AODA - Integrated Accessibility Standard	Standard for Employment
Revised: October 20, 2023	

## **Purpose**

The purpose of this policy is to create a statement of commitment policy that provides a framework within which accessibility plans and initiatives are to be created in order to move the organization towards the goal of improved accessibility for people with disabilities, specifically with regard to the employment standard in the Integrated Regulation.

## Scope

This policy applies to all applicants, prospective employees and employees, and all facilities of the Company. However, it does not apply to volunteers and other non-paid employees.

## Responsibility

It is the responsibility of the managers, immediate supervisors, and department leaders to ensure that all employees follow the guidelines set out in this policy.

Each manager, immediate supervisor, and department leader is responsible to ensure all employees are trained under the employment standards of the Integrated Regulation and this policy, as well as the Company's employment practices and procedures.

Management staff and other staff members who have responsibility for recruitment and selection and/or supervising the work of employees of the Company will ensure that the provisions in this policy are implemented.

Staff of the Human Resource Department will ensure that the provisions of this procedure are incorporated in their practices.

#### **Procedures**

## Recruitment, assessment and selection process

The Company will ensure that in its recruitment policies the employees and the public are made aware that it will provide accommodation for applicants with disabilities in its recruitment, assessment and selection process, where applicable.

The Company's job postings and advertisements will provide guidance on how people with disabilities can approach the organization if accommodations are required during any stage of the recruitment process.

If applicants request accommodation the Company will consult with the applicant and provide suitable accommodation in a manner that takes into account that applicants accessible needs due to disability.

## **Supports for Employees**

The Company will inform employees of its policy of supporting employees with disabilities and procedures that provide for job accommodations.

The Company will make this information available as soon as practicable to new employees and will provide updated information as policies are revised.

The Company will provide updated information to employees whenever there is a change to policies, taking into account all accessibility needs.

## **Accessible Formats and Workplace Information**

Where an employee with a disability so requests, the Company will consult with the employee to provide or arrange for accessible formats and communication supports in relations to workplace information. This includes:

- a) Any information employees need to perform the job
- b) General information that is available to all employees at work

The Company will consult with the employee to determine the suitability of an accessible format or communication.

## Workplace emergency response information

The Company will ensure that individualized workplace emergency response information is provided to employees who have a disability provided that the disability is such that individualized information is necessary and the organization has been made aware of the need for accommodation, this information provided as soon as it is possible.

If an employee who receives individualized workplace emergency response information requires assistance, the Company will, with the consent of the employee, provide such information to the person designated to provide assistance to the employee.

The Company's individualized emergency response information may include how an employee with:

- a) a wheelchair can safely exit a building in the event of a fire
- b) a hearing disability, who cannot hear an alarm, will be notified in the event of an emergency
- c) a visual disability, will identify and navigate emergency escape routes
- d) an invisible disability (ex. Heart condition and unable to use stairs) will evacuate a building during an emergency

The emergency response information is shared with the people designed to help (with the employee's consent) and should be reviewed when the employee changes work locations, when reviewing overall accommodation needs and when reviewing the Company's general emergency response policies.

#### **Individual Accommodation Plans**

The Company will have a written process in place for the development of documented individual accommodation plans for employees with disabilities.

The Company's written process will address:

- a) How the employee requesting accommodation can participate in the development of the individual accommodation plan
- b) The means by which the employee is assessed on an individual basis
- c) How the Company can request an evaluation by an outside medical or other expert, at the Company's expense, to assist in determining if accommodation can be achieved and, if so, how it can be achieved
- d) How the employee can request to have a representative of their bargaining unit, or another workplace representative if the employee is not a member of a bargaining unit, participate in the development of the accommodation plan
- e) The steps taken to protect the privacy of the employee's personal information.
- f) The frequency with which the individual accommodation plan will be reviewed and updated and how this will be done.
- g) How the reasons for denying an individual accommodation plan will be provided to an employee if accommodation is denied
- h) How the Company will ensure that the individual accommodation plan is provided in a format that takes into account the employee's accessibility needs due to a disability

The plan will include providing workplace information in an accessible format if requested and providing individualized workplace emergency response information, the company will also identify any other accommodation that is to be provided.

#### Return-to-work process

The return-to-work process required under the AODA does not replace or override any other return-to-work process created as a result of any other statutory obligations under the Workplace Safety and Insurance Act and requires the Company to develop, out in place and document a return-to-work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The process will include:

- a) An outline of the steps the company will take to facilitate the return to work of employees who were absent because their disability required them to be away from work.
- b) The use of documented individual accommodation plans as part of the process
- c) Accessibility awareness training for all staff involved in program or course design, delivery and instruction related to these responsibilities.

## Performance management process

In administering performance management processes in respect of employee with disabilities, the Company will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans. Accommodation will be provided when holding formal or informal performance reviews.

#### Career development and advancement

Where the Company provides career development and advancement to its employees, the Company will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans.

The Company will provide accommodations when required for employees to successfully learn new skills or take on more responsibilities. Feedback and coaching will also be provided in a way that accessible to employees with disabilities. It will also be given during promotions and/or move to a new job.

#### Redeployment

Where the Company has a redeployment process in place, it will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans during the redeployment process.

## **Training for staff**

The Company will provide training on this policy, practices and procedures, the employment standards under the Integrated Regulation and the Human Rights Code as it pertains to the duty to accommodate to all employees with disabilities.

Training will be provided to all employees, volunteers, those involved in the development and approvals of company policies, practices and procedures, as well as any other person who provides goods, services or facilities on the Company's behalf.

#### Modification to this and other policies

The Company is committed to developing employment policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on applicants, prospective employees and employees with disabilities.

Any employment policy of the Company that does not respect and promote the dignity and independence of applicants, prospective employees and employees with disabilities will be modified or removed.

This policy is available in an alternative format upon request.

# **Record Keeping**

The Company will maintain accurate records of training delivered to staff and make these records available for inspection as may be required.