

## AODA – (IASR) EMPLOYMENT POLICY POLICY # HR011

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<b>Written by:</b> HR Specialist	<b>Date:</b> December 2017
<b>Reviewed by:</b>	<b>Date:</b>
<b>Approved by:</b> President	<b>Date:</b>

### INTENT

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Crawford Packaging shall follow the principles of dignity, independence, integration and equal opportunity.

### DEFINITIONS

*Accessible Formats* – Include but are not limited to large print, recorded audio and electronic formats, and other formats usable by persons with disabilities.

*Communication Supports* – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, and other supports that facilitate effective communications.

*Performance Management* – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

*Redeployment* – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff whenever possible.

### PRINCIPLES

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

1. *General Requirements*
2. *Recruitment, Assessment and Selection*
3. *Accessible Formats and Communication Supports for Employees*
4. *Workplace Emergency Response Information*

5. *Documented Individual Accommodation Plans*
6. *Performance Management and Career Development and Advancement*
7. *Return to Work*
8. *Redeployment*
9. *Review*

## **REQUIREMENTS**

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

### Establishment of Accessibility Policies and Plans

Crawford Packaging will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Crawford Packaging will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Crawford Packaging will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website once completed.

Crawford Packaging will review and update its accessibility plan once every five (5) years. Annual status reports will be prepared that will report on the progress of the steps taken to implement Crawford Packaging's accessibility plan. If requested, the report shall be created in an accessible format.

Crawford Packaging will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities whenever possible.

## **TRAINING REQUIREMENTS**

Crawford Packaging will provide training for its employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Crawford Packaging's policies, and all other persons who provide goods, services or facilities on behalf of Crawford Packaging.

Training will be provided during an employee's new hire orientation. Training will also be provided on an ongoing basis as changes to Crawford Packaging's accessibility policies occur. HR will maintain training records.

## **RECRUITMENT, ASSESSMENT AND SELECTION**

Crawford Packaging will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Crawford Packaging will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Crawford Packaging's policies and supports for accommodating people with disabilities.

## **ACCESSIBLE FORMATS AND COMMUNICATION SUPPORT**

If an employee with a disability requests it, Crawford Packaging will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.
- Crawford Packaging will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Crawford Packaging will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

## **WORKPLACE EMERGENCY RESPONSE INFORMATION**

Where required, Crawford Packaging will create individual workplace emergency response information for employees with disabilities. This information will consider the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs, or plans are reviewed; and/or Crawford Packaging reviews general emergency response policies.

## **DOCUMENTATED INDIVIDUAL ACCOMMODATION PLANS**

Crawford Packaging must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee

## **PERFORMANCE MANAGEMENT AND CAREER DEVELOPMENT**

Crawford Packaging will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

## **RETURN TO WORK**

Crawford Packaging will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Crawford Packaging will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

## **REDEPLOYMENT**

The accessibility needs of employees with disabilities will be considered in the event of redeployment.

*Individual accommodation plans will be consulted, as required.*

## REVIEW

This policy will be reviewed regularly to ensure that it is reflective of Crawford Packaging's current practices as well as legislative requirements.