

 <p><b>THE NARMCO GROUP</b></p>	Corporate Policy Manual	
	Document Number:	CPM 12.5A
	Document Owner	D. Rodzik Jr
	Effective Date:	07/03/2023
	Revision Number:	3
	Page Number:	1 of 5
<p><b>AODA – INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)</b></p>		

## **1.0 INTENT**

- 1.1 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.
- 1.2 All employment services provided by the Company shall follow the principles of dignity, independence, integration and equal opportunity.

## **2.0 DEFINITIONS**

- 2.1 Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- 2.2 Communication Supports – Include but are not limited to alternative and augmentative communication supports, plain language, and other supports that facilitate effective communications.
- 2.3 Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.
- 2.4 Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

## **3.0 GENERAL PRINCIPLES**

- 3.1 In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:
- A. Recruitment, Assessment and Selection
  - B. Accessible Formats and Communication Supports for Employees
  - C. Workplace Emergency Response Information
  - D. Documented Individual Accommodation Plans
  - E. Performance Management and Career Development and Advancement
  - F. Redeployment
  - G. Review

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	Revision Number:	3
	Page Number:	2 of 5
<b>AODA – INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)</b>		

### 3.2 Recruitment, Assessment and Selection

**3.2.1** The Company will notify employees and the public about the availability of accommodation for job applicants who have disabilities by:

- Placing a notice on the Company website that the Company will accommodate persons with disabilities during the recruitment and assessment processes and that persons with disabilities will be accommodated on hiring and during employment.
- Placing a notice in all job postings that the Company will accommodate persons with disabilities during the recruitment and assessment processes and that persons with disabilities will be accommodated on hiring and during employment.
- Advising all Applicants selected for participation in an interview or selection process that the Company will accommodate persons with disabilities during the recruitment and assessment processes and that persons with disabilities will be accommodated on hiring and during employment.
- Where an accommodation is requested, the Company will consult with the applicant and provide or arrange for suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.
- When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees and disabilities.

**3.2.2** The notice given above will be as follows:

*(Company) is compliant with all Ontario law in providing accommodation to persons with disabilities and to ensuring an accessible environment. (Company) will accommodate persons with disabilities during the recruitment and assessment processes and persons with disabilities will be accommodated on hiring and during employment. Should you require accommodation, please do not hesitate to request it.*

### 3.3 Accessible Formats and Communication Supports for Employees

**3.3.1** The Company will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur. Employees will be provided with the policies on orientation and any changes will be provided personally or posted where they will come to the attention of all employees.

**3.3.2** If an employee with a disability requests it, the Company 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.

	Corporate Policy Manual	
	Document Number:	CPM 12.5A
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	Revision Number:	3
	Page Number:	3 of 5
<b>AODA – INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)</b>		

- 3.3.3** The Company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.
- 3.4** Workplace Emergency Response Information
- 3.4.1** Where requested, the Company will create individual workplace emergency response information for employees with disabilities. This information will take into account 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.
- 3.4.2** 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
  - Reviews general emergency response policies.
- 3.5** Document Individual Accommodation Plans
- 3.5.1** The Company will take the following steps to develop individual accommodation plans and return to work policies for employees who have been absent due to a disability.
- 3.5.2** Employees who request accommodation will, on request, provide medical information sufficient to allow the Company to address the accommodation request in a meaningful manner.
- 3.5.3** The Company will identify suitable jobs or jobs which can be suitably and reasonably accommodated to meet the employee's accommodation requirements.
- 3.5.4** The Human Resources Manager or designate will meet with the employee to develop a Modified Work/Accommodation plan. If represented by the Union, the Employee may request to have their Union steward present who may participate in the development of an accommodation plan. If not represented by a Union, the Employee may request to have another representative present who may participate in the development of an accommodation plan.
- 3.5.5** If an individual accommodation plan is denied, the Company will provide written reasons to the employee for the denial.
- 3.5.6** If suitable accommodation cannot be arranged or if the employee believes the accommodation is not suitable, the employee may make a written request to have the accommodation evaluated by an outside medical expert or other expert at the Company's expense.

	Corporate Policy Manual	
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	Revision Number:	3
	Page Number:	4 of 5
<b>AODA – INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)</b>		

- 3.5.7** The Employee’s personal information will only be shared to the extent necessary to develop or implement an individual accommodation plan.
- 3.5.8** Accommodation plans will be reviewed at the request of either party or when additional or new medical information is provided. If the medical information provides for an expiry date, the accommodation plan will expire at that date but it can be renewed as needed.
- 3.5.9** Individual accommodation plans will be provided in a format that takes into account the employee’s accessibility needs due to disability as well as in written format.
- 3.5.10** Individual accommodation plans will be placed in the employee’s personnel files.
- 3.5.11** Individual accommodation plans will also include individualized workplace emergency response information.
- 3.6** Performance Management and Career Development and Advancement
- 3.6.1** The Company will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted and amended as necessary, in accordance with the procedure in D, to reflect accommodations required to succeed elsewhere in the organization or take on new responsibilities in their current position.
- 3.6.2** Performance management will be implemented as follows:
- a.** Individual accommodation plans will be reviewed to understand the employee’s accommodation needs and determine whether it needs adjusting to improve his or her performance on the job.
  - b.** Documents related to performance management e.g. reviews, will, on request, be provided in accessible formats.
  - c.** The Company will provide informal and formal coaching and feedback in a manner that takes into account the employee’s disability.
- 3.7** Redeployment
- 3.7.1** The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

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	Revision Number:	3
	Page Number:	5 of 5
<b>AODA – INTEGRATED ACCESSIBILITY STANDARDS  REGULATION (IASR)</b>		

**4.0 REVIEW AND REVISIONS**

**4.1** These policies and programs will be reviewed annually by Corporate Human Resources, in collaboration with Plant and/or Corporate resources and revise as necessary.

<b>E-Revision #</b>	<b>Date</b>	<b>Revision Description</b>
00	08/17	Initial Release
01	08/20	Review
02	08/21	Review
03	07/23	Update to new policy format and created 12.5A Individualized Accomodation Plan (form)