

Belmont HOUSE

SUBJECT: AODA – Integrated Accessibility Standards Regulation (IASR) Employment	
VOLUME: VOLUME 1 – ADMINISTRATION HUMAN RESOURCES	ORIGINAL DATE: January 2015
REVIEWED BY: JOINT OCCUPATIONAL HEALTH AND SAFETY COMMITTEE	REVISED DATE: June 14, 2024
APPROVED BY: CHIEF EXECUTIVE OFFICER	PAGE : Page 1 of 10
SIGNATURE: 	

APPLIES TO:

All employees.

PREAMBLE:

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 Belmont House shall follow the principles of dignity, independence, integration and equal opportunity.

POLICY:**General Principles**

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

- A. General Requirements
- B. Recruitment, Assessment and Selection
- C. Accessible Formats and Communication Supports for Employees
- D. Workplace Emergency Response Information
- E. Documented Individual Accommodation Plans

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F. Performance Management and Career Development and Advancement

G. Return to Work

H. Redeployment

I. Review

A. General Requirements

General requirements that apply across all of the four (4) standards, Information and Communications, Employment, Transportation and Design of Public Spaces, are outlined as follows.

Establishment of Accessibility Policies and Plans

The Joint Occupational Health & Safety Committee (JHSC) led by the Human Resources Department is responsible for the Accessibility for Ontarians with Disabilities Act (AODA) program. The Chief Executive Officer (CEO) will approve and sign off on the plan and associated documents.

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

- Belmont House 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.
- Belmont House will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meets its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request and the AODA program will be posted on our website.
- Belmont House will review and update its accessibility plan at least once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Status reports throughout each year will be prepared and presented by Joint Occupational Health and Safety Committee (JHSC) which includes Human Resources on the progress of the steps taken to implement Belmont House'

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accessibility plan. Progress will be documented in minutes at both JHSC and Senior Management meetings and in other documents including Company Newsletters and a summary document will be prepared for external users accordingly. Status report for external users will be in an accessible format.

Procuring or Acquiring Goods and Services or Facilities

Belmont House will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

This includes using Agency Staff and 3rd party contractors. The departments that are in contact with these parties are responsible for adhering to the policy.

Training Requirements

Belmont House will provide training for its employees, volunteers, students, agents and/or contractors regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities.

Belmont House will provide training as soon as practicable. Specifically for staff, volunteers and students, this will be their first day at Belmont House as part of their orientation as they deal with the public.

Training will also be provided to individuals who are responsible for developing, reviewing and maintaining Belmont House's policies (Joint Occupational Health & Safety Committee and HR), and all other persons who provide goods, services or facilities on behalf of Belmont House.

Front Desk will be provided additional specific training on customer service as they have responsibilities dealing with the public regarding feedback, requests for alternate formats, making signs for elevators out of service (posting alternate arrangements to access services), allowing guide dogs in the building and obtaining devices for those that need additional assistance when arriving for a visit.

The training requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, will be the focus as it applies to the provision of goods and services to the public or other third parties.

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Tuck Shop personnel will also be given additional training in line with Front Desk training on AODA to ensure customers are served appropriately in a manner that respects their disabilities.

Training will be done on a recurring basis to ensure all parties are familiar with all aspects of AODA and when revisions are made to the training program as a result of changes to legislation, procedures and/or practices.

Training records will be kept by the Human Resources Department and retained as per legal requirements.

Self-Serve Kiosks

Belmont House will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

Where kiosks cannot be changed to accommodate a disability, information will be provided on how the same services provided on the kiosk can be accessed.

B. Recruitment, Assessment and Selection

Belmont House 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, Belmont House will consult with the applicant and provide or arrange for suitable accommodation.

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

A reference to the AODA program has been added to new hire letters of offer.

C. Accessible Formats and Communication Supports for Employees

Belmont House will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Belmont House 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

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- Information that is generally available to all employees in the workplace.

Belmont House will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

Accessible formats can include large print, digital files, audio but other formats can be arranged upon request.

D. Workplace Emergency Response Information

Where required, Belmont House 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.

The individual will be involved in the process including meeting with Human Resources, having a union representative present (if applicable), providing information they deem appropriate including 3rd party medical information from a professional of their choice and having an opportunity to provide input or feedback. If an evaluation is needed by a medical or other expert, Belmont will pay the cost.

At a minimum, all individual accommodation plans which cover emergency response information will be reviewed once per year by HR with the individual to ensure documentation on file is accurate, current and all parties understand and agree with the accommodations put in place (in this instance for emergency situations).

Otherwise, the information will be reviewed at the time when:

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

Accommodations required will be documented on the following forms:

- Belmont House Accommodation Emergency Response Form
- Belmont House Individual Emergency Response Plan – Overview List

Those requiring assistance in an emergency due to their disability will sign a waiver allowing Belmont House to share confidential information to those in charge of the building that can help them during emergency situations. Only necessary information will be shared in this circumstance to assist them under these circumstances. The accommodations plan will not be shared in full – only the specific information needed.

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The Joint Occupational Health & Safety Committee are responsible for the development and maintenance of the Emergency Response Plan Document (Integrated Standards Compliant) which refers to the following policies and programs used in emergency situations:

- Fan Out Program
- Pandemic Planning Policy
- Medical Emergencies – Code Blue Policy
- Evacuation Crisis – Code Green Policy
- Intruder – Code Purple Policy
- Violent Behavior – Code White policy
- Bomb Threat – Code Black Policy
- Missing Person – Code Yellow Policy
- Evacuation Precautionary – Code Green (Light) Policy
- Fire – Code Red Policy
- External Disaster – Code Orange Policy

E. Documented Individual Accommodation Plans

Belmont House must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities.

The process for the development of documented individual accommodation plan starts with the individual contacting Human Resources Department and/or their supervisor who will then contact HR.

Individuals have the option to participate in all activities described above including attending meetings with HR, reviewing draft plans before they are finalized and providing information including expert/medical documentation for consideration.

Unionized employees have the option to have a union steward present in all conversations and a copy of the final documents may be provided to the union upon request if approved by the employee.

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 and the subsequent assessment. All parties are encouraged to provide input and feedback (verbally, in writing and medical documentation if applicable).

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- The ways that an employee can request an evaluation by an outside medical expert or other experts (at employer's expense) to determine if accommodation can be achieved. Any party can use a medical professional of their choice (Belmont will accept 3rd party medical information of the persons choice; in instances where Belmont objects to the provider used, they will express their concerns why for further discussion). If a medical or other expert is used for an evaluation, Belmont will pay the cost.
- The steps taken to protect the privacy of the employee's personal information. Information is exclusively in the HR department except in emergency situations where the practice followed is described who has access to this information, the purpose and how they will assist in emergency situations.
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done.
- Providing the accommodation plan in an accessible format, based on the employee's accessibility needs. If the person requires a different format, Belmont will accommodate where possible based on their request and this will be documented in the plan.

The above process noted will be followed for all other individuals including volunteers, students and other applicable parties.

At a minimum, all individual accommodation plans will be reviewed once per year by HR with the individual to ensure documentation on file is accurate, current and all parties understand and agree with the accommodation put in place.

F. Performance Management and Career Development and Advancement

Belmont House 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, as required with Human Resources.

G. Return to Work

Belmont House will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work.

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

H. Redeployment

Belmont House has one (1) job site.

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment into another position.

Individual accommodation plans will be consulted, as required.

I. Review

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

PROCEDURE:

1. Records

Belmont House will maintain records on AODA compliance including training as required by law. Those records will be kept and maintained by Human Resources.

2. Recruitment

The Human Resources Department will contact all external candidates during the recruitment process. External candidates will be told verbally that Belmont House supports/adheres to all requirements of AODA and that all candidates will be accommodated during the recruitment process should the candidate proceed further in the process.

Candidates may be given the following consideration:

- Additional time to complete written tests (if this is part of the recruitment process).
- An appropriate interview room will be selected which meets the candidates needs.

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- Additional time and/or additional clarification/assistance to answer questions posed in the interview if needed.
 - Will be informed during the interview that Belmont will accommodate the successful candidate should they require accommodations and that an individual plan will be created.
3. Departments will inform HR should any of our external partners (example – Agencies) fail to support/meet standards outlined under AODA.
 4. Records of Performance Reviews will be kept in each employee's file located in the Human Resources office. Employees will be given a copy of their performance review and have the option to provide comments, ratings and sign off on the final document before it is filed.

Performance Reviews are conducted yearly for full time employees and every other year for part time and casual employees.

Reviews will be audited randomly to ensure compliance under AODA. This includes ensuring individuals are not penalized in any respect if they have a disability and/or are being currently accommodated. Any concerns found by Human Resources will be brought to the Chief Executive Officer's attention for review/discussion.

5. Any changes required to an employee's job will be documented in writing. Discussions should involve the employee, applicable Manager, Human Resources and the Union (where applicable).
6. Accommodation plans and emergency information will be updated regularly in cooperation with the person based on their needs. The frequency will be based on the employee's feedback, medical documentation, if the disability is permanent or temporary. The goal is to keep the information up to date and to ensure meaningful work is being provided.

DEFINITIONS:

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

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

Kiosk – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

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, when a particular job or department has been eliminated by the organization.

REFERENCES:

- Accessibility for Ontarians with Disabilities Act, 2005.
- AODA Belmont House Program
- Diversity in the Workplace Program (Belmont House)
- Integrated Accessibility Standards, Ontario Regulation 191/11
- Ontario Employment Standards Act, 2000 (ESA)
- Ontario Human Rights Code

CROSS-REFERENCE:

AODA - Integrated Accessibility Standards Regulation (IASR) Information and Communications Policy
AODA - Accessible Customer Service Policy
AODA - Multi-Year Plan & Policies Policy
Code of Conduct Policy
Contractor Policy
Dismissal - Employee Policy
Early & Safe Return to Work Policy
Human Rights Policy
Performance Management Policy
Recruitment Policy
Termination of Employment Policy
Termination, Notice of Policy
Workplace Discrimination & Harassment Policy