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Statement of Intent

Infrastructure Health & Safety Association (the “IHSA”) recognizes the need to identify and remove barriers faced by individuals with disabilities and to improve accessibility to these individuals. IHSA is committed to meeting the needs of and achieving greater accessibility for individuals with disabilities in a timely manner through compliance with the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) and its various regulations including the *Integrated Accessibility Standards*. It is for these purposes that IHSA has developed this policy.

APPLICATION

This Policy applies to all employees, directors and officers of IHSA and all individuals and other third parties that provide goods, services or facilities on IHSA’s behalf (hereinafter collectively referred to as “IHSA Personnel”).

DEFINITIONS

“Accessible Formats” – refers to alternatives to standard print.

“Career Development/Advancement” – includes providing additional responsibilities within an employee’s current position and the movement of an employee from one position to another that may be higher in pay, provide greater responsibility or be at a higher level within IHSA or any combination thereof.

“Communication” – refers to the interaction between two or more people or entities when Information is provided, sent or received between the people or entities.

“Communication Supports” – refers to methods to assist Communications.

“Conversion Ready” – refers to an electronic or digital format that assists conversion into an Accessible Format such as Braille, large print, audio cassettes, CD’s, DVD’s, etc.

“Information” – refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

“Internet Website” – refers to IHSA’s external website that is available to the public and contains a collection of related web pages, images, videos and other digital assets, accessible through an Internet address (www.ihsa.ca).

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“Performance Management” – means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

“Redeployment” – means 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.

“Unconvertible Information/Communication” – refers to Information and/or Communication for which (i) it is not technically feasible to convert or the Information or Communication to an Accessible Format; or (ii) the technology to convert the Information or Communication to an Accessible Format is not readily available.

A. GENERAL REQUIREMENTS

1. Accessibility Plan

IHSA will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers faced by individuals with disabilities. The accessibility plan will be posted on IHSA website (www.ihsa.ca) and be provided in an Accessible Format upon request. The accessibility plan will be reviewed and updated at least once every five years. IHSA will make assessments to determine what specific steps will be needed to increase accessibility and achieve the goals as set out in the policy. IHSA will strive to seek feedback from employees, clients, customers and individuals with disabilities in order to get a broader perspective of existing barriers to accessibility within the organization.

2. Self-Service Kiosks

IHSA does not currently design, procure or acquire any self-service kiosks (which include hand-held payment devices). If IHSA decides to implement self-service kiosks in the future, it will have regard to the accessibility for persons with disabilities. In order to achieve greater accessibility to individuals with disabilities, the technical features (colour contrast, font size, time features, voice activating equipment, visual and non-visual modes of operation, etc.), structural features (height, stability, headsets, volume control, specialized keyboards, etc.) and access path to the kiosk (reach ranges, proximity, etc.) will be taken into consideration. IHSA will strive to include these accessibility features where possible, and will consider the accessibility needs, preferences and abilities of a wide range of users.

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3. Training

By January 1, 2015, IHSA will ensure that it has provided training to all IHSA Personnel with respect to the requirements of the accessibility standards referred to in the *Integrated Accessibility Standards* and in the *Human Rights Code (Ontario)* as it pertains to persons with disabilities. The training will be appropriate to the duties of the specific IHSA Personnel and will be based on the job descriptions and/or day-to-day practice of the specific IHSA Personnel. The training will include Information about achieving accessibility by 2025 and will highlight the requirements under the *Information and Communication Standard* as well as the *Employment Standard*. IHSA will provide the training as soon as practicable and on an ongoing basis, such as when new IHSA Personnel first join or engage with IHSA. IHSA will keep a record of the training provided, including the dates on which the training was provided and the number of individuals to whom it is provided.

B. INFORMATION AND COMMUNICATIONS STANDARD

1. Exceptions

The *Information and Communications Standard* and its requirements do not apply to the following:

- (a) Products and product labels;
- (b) Unconvertible Information/Communication; and
- (c) Information that IHSA does not control directly or indirectly through a contractual relationship.

If IHSA determines that Information or Communication is Unconvertible Information/Communication, it will provide the individual requesting the Information or Communication with:

- an explanation as to why the Information or Communication is unconvertible; and
- a summary of the unconvertible Information or Communication.

2. Feedback

- By January 1, 2015, IHSA will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for Accessible Formats and Communication Supports, upon request. IHSA will be prepared to receive feedback through a variety of methods in order to provide accessible feedback processes to persons with disabilities, which may include phone surveys, online questionnaires, or comment cards.

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3. Accessible Formats and Communication Supports

IHSA strives to provide Information about its goods and services in formats that are accessible to our customers. Accessible formats and *Communication Supports* for persons with disabilities will be provided, upon request, taking into account the individual's accessibility needs due to disability. The Information will be provided in a timely manner and at a cost that is no more than the regular price charged to others. IHSA will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support. The public will be notified about the availability of Accessible Formats and Communication Supports by posting the Information on the premises in public areas or on IHSA website (www.ihsa.ca). Accessible formats and Communication Supports may include one or more of the following:

- accessible electronic formats such as HTML and MS Word;
- Braille;
- accessible audio formats ;
- large print;
- text transcripts of visual and audio Information;
- reading the written Information aloud to the person directly;
- exchanging hand written notes or providing a communication assistant;
- captioning or audio description;
- assistive listening systems;
- augmentative and alternative communication methods and strategies, such as letter, word or picture boards, and devices and speak out messages;
- sign language interpretation and intervenor services; and
- repeating, clarifying, or restating Information.

IHSA will ensure that the Accessible Formats and Communication Supports are in place by January 1, 2016.

4. Emergency Procedures, Plans and Public Safety Information

By January 1, 2012, IHSA will provide information on emergency procedures, emergency plans and public safety information in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request. IHSA will strive to enable persons with disabilities to be prepared in case of emergency situations.

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5. Accessible Websites and Web Content

IHSA recognizes the importance of website accessibility. IHSA will ensure that its Internet Websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (the “WCAG”) 2.0, initially at Level A and increasing to Level AA in accordance with the following schedule:

- By January 1, 2014, new *Internet Websites* and web content on those sites will conform with the WCAG 2.0 Level A.
- By January 1, 2021, all *Internet Websites* and web content will conform with WCAG 2.0 Level AA, other than success criteria 1.2.3 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded).

IHSA will ensure that this accessibility standard applies to all websites and web content, including web-based applications that IHSA controls directly or through a contractual relationship, which websites and/or web content allow for modification to such requirements.

IHSA will ensure that the above requirements are met unless it is not practical to do so. In determining whether meeting the above requirements is not practicable, IHSA may consider the availability of commercial software or tools and the significant impact on an implementation timeline that is planned or initiated.

C. EMPLOYMENT STANDARD

1. Scope and Application

The *Employment Standard* applies to all employees of IHSA but does not apply to volunteers and other non-paid individuals of IHSA.

2. Schedule

IHSA will ensure that the *Employment Standard* policy is in place by January 1, 2016.

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3. General Recruitment

IHSA understands the importance of accessibility during recruitment. IHSA will notify its employees and the public about the availability of accommodation for applicants with disabilities as part of its recruitment process.

4. Recruitment, Assessment or Selection Process

During the recruitment process, IHSA will notify job applicants, at the time they are selected to participate in an assessment or selection process, that accommodations are available upon request. If a selected applicant requests an accommodation, IHSA will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

5. Notice to Successful Applicants

When making offers of employment, IHSA will notify the successful applicant of its policies for accommodating employees with disabilities.

6. Informing Employees of Supports

IHSA will inform its employees of its policies used to support its employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. The information will be provided to new employees as soon as practicable after they begin their employment. IHSA will provide updated information to its employees whenever there is a change to existing policies pertaining to the provision of job accommodations that take into account an employee's accessibility needs due to disability.

7. Accessible Formats and Communication Supports for Employees

When requested, IHSA will consult with the employee to provide or arrange for the provision of Accessible Formats and Communication Supports to an employee with a disability where such is needed in relation to Information that is either necessary for the employee to perform the employee's job or generally available to employees in the workplace. IHSA will consult with the employee making the request when determining the suitability of an Accessible Format or Communication support. If the employee has an individual accommodation plan, then the Accessible Formats or Communication Supports provided to the employee will be included in the individual accommodation plan.

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8. Workplace Emergency Response Information

Individualized workplace emergency response Information will be provided to employees with disabilities where the disability is such that the individualized Information is necessary and IHSA is aware of the need for accommodation due to the employee's disability. IHSA will consult with employees who have disabilities to ensure that the individualized workplace emergency response Information meets the employees' needs.

If an employee who receives individualized workplace emergency response Information requires assistance, IHSA, with the consent of the employee, will provide the workplace emergency response Information to the person designated by the employer to provide assistance to the employee. IHSA will ensure that the employees' privacy is respected by not including personal medical Information in the individualized workplace emergency responses Information.

The individualized workplace emergency response Information will be provided as soon as practicable after IHSA becomes aware of the need for accommodation due to the employee's disability.

IHSA will review an employee's individualized workplace emergency response Information when:

- (a) the employee moves to a different location in IHSA;
- (b) the employee's overall accommodations needs or plans are reviewed; and
- (c) when IHSA reviews its general emergency response policies.

If an employee has an individual accommodation plan, then the individualized workplace emergency response Information provided to the employee will be included in the plan.

9. Individualized Accommodation Plans

IHSA will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. Employees with disabilities will be provided with individualized accommodation plans. The process will include the following elements:

- (a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;

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- (b) The means by which the employee is assessed on an individual basis;
- (c) The manner in which IHSA can request an evaluation by an outside medical or other expert, at the expense of IHSA, to determine if and how accommodation can be achieved;
- (d) The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, 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 the manner in which it will be done;
- (g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee, and;
- (h) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

The individual accommodation plan will:

- (a) include any Information regarding Accessible Formats and *Communication Supports* provided, if requested;
- (b) include individualized workplace emergency response Information, if required, and;
- (c) identify any other accommodation that is to be provided.

IHSA will ensure that the Information collected to develop individual accommodation plans remains private.

10. Return to Work Process

IHSA will develop and have in place 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 and will document the process. The return to work process will outline the steps IHSA will take to facilitate the return to work of employees who were absent from work because of their disability. The return to work process will also incorporate the individualized accommodation plan of the employee.

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This process will not replace or override any other return to work process created by or under another statute. If an employee has an illness or injury that is covered under the return to work process in the *Workplace Safety and Insurance Act*, then that process will govern.

11. Performance Management

IHSA will take into account the accessibility needs of employees with disabilities, including individual accommodation plans, when using its Performance Management process in respect of employees with disabilities. If the employee has a disability, then IHSA will revisit the employee's individual accommodation plan to see if any adjustments are required.

12. Career Development/Advancement

IHSA will take into account the accessibility needs of its employees with disabilities, including individual accommodation plans, when providing Career Development/Advancement to its employees with disabilities. Accommodations that employees with disabilities may need to succeed elsewhere in IHSA or to take in new responsibilities in their current position will be taken into account.

13. Redeployment

IHSA will take into account the accessibility needs of its employees with disabilities, including individual accommodation plans, when there is to be a Redeployment of an employee with a disability.