

Manual:	Human Resources Manual	No.	14
Section:	Employment	Effect	31-Dec-14
Subject:	Integrated Accessibility Standards Regulation (IASR) Employment Policy	Rev.	5-Oct-22 <b>27-Feb-24</b>
Issue to:	HR Intranet Web Site EHC Web site	Facility	Oshawa
		Approved	Melissa Mitchell

## 1. Purpose

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standards 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 EHC Canada, Inc. shall follow the principles of dignity, independence, integration, and equal opportunity.

## 2. Definitions

- a) Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.
- b) 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.
- c) Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.
- d) Redeployment – The reassignment of employees to other departments or jobs within the organisation as an alternative to layoff, when a particular job or department has been eliminated by the organisation.

## 3. 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

- 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 two (2) standards, Information and Communications and Employment, are outlined as follows.

### Establishment of Accessibility Policies and Plans

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

EHC 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.

EHC 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 Integrated Accessibility Standards Regulation (IASR). Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

EHC will review and update its accessibility plan once every five (5) years and will establish, review and update EHC's accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement EHC's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

### Training Requirements

EHC 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 EHC's policies, and all other persons who provide goods, services or facilities on behalf of EHC Canada.

Training will be provided to employees and volunteers regarding the IASR and the Ontario Human Rights Code as they pertain to individuals with disabilities. Training will be provided on an ongoing basis to new employees and as changes to EHC's accessibility policies occur.

### Records

EHC will maintain records on the training provided, when it was provided and the number of employees that were trained.

## **B. Recruitment, Assessment and Selection**

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

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

### **C. Accessible Formats and Communication Supports for Employees**

EHC 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, EHC 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.

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

### **D. Workplace Emergency Response Information**

Where required, EHC 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. With consent given by the employee on the individual accommodation plan document, the employer will provide the workplace emergency response information to the person designated to assist the employee.

This information will be reviewed when:

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

EHC will provide training to employees designated to assist individuals with disabilities on how to effectively execute the individualized emergency response plans

EHC will ensure that all individualized workplace emergency response information is kept confidential and shared only with the consent of the employee and only with those individuals who are designated to assist them.

### **E. Documented Individual Accommodation Plans**

EHC will follow the written process below for documenting individual accommodation plans for employees with disabilities using the Individual Accommodation Plan Template-form. The accommodation plan will be reviewed annually. The process for the development of these accommodation plans 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 employee can request an evaluation by an outside medical expert, or other experts (at the company's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The manner in which the employee can request the participation of a representative from an outside agent, or other representative from the workplace, in the development of the accommodation plan.
- 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;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee on paper; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

Individual accommodation plans are written documents that list all accommodations workers with disabilities need to make their jobs accessible.

### **Starting the Individual Accommodation Plan**

Employees with disabilities and their managers will write individual accommodation plans together and sign the finished plans. Other people involved in developing individual accommodation plans may include:

- Human Resources
- A volunteer from the workplace,
- A medical professional or another expert, consulted at the employer's expense

An employee with a disability may approach their employer and request accommodation. The employee has the most knowledge about their own needs and what accommodations will best meet those needs. At other times, the employer may ask the worker whether accommodation would help them perform job tasks.

### **Discussing Accommodations**

Once the employee and manager/supervisor have talked about the need for accommodation, they should discuss what the worker's needs are. During this discussion, the employee's disability does not be disclosed, Rather the focus should be to understand how the employee will perform certain functions of the job. For instance, job functions a worker could perform with accommodations include:

- Accessing the workplace or workstation

- Communicating verbally or in writing
- Maintaining focus, organization, or energy level
- Coping with stress or social situations

The Human resources department will secure and keep confidential individual accommodation plans, and disclose it only with the employees consent to people involved in the accommodation process. EHC may deny the worker's accommodation request, however this denial will be provided in writing to the employee.

Any documents relating to this information, such as a copy of an emergency response plan or a copy of the accommodation plan in an accessible format, should be attached to the plan. The employee's copy of the plan, or the denial if applicable, must be in a format the employee can access.

## **F. Performance Management and Career Development and Advancement**

EHC 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.*

## **G. Return to Work**

EHC 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 EHC 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).

All return to work process will be adapted to each individual and situation. The agreed-upon accommodations will be written and shared with the employee and remain flexible if adjustments are needed. The following steps depict the process.

1. **Initiate the Leave:** The employee needing to take a disability leave will inform his or her manager and human resources. With the employee's consent, the parties will maintain contact to facilitate the return to work.
2. **Open Communication:** The employer will privately discuss with the employee about their needs and necessary accommodations. EHC will maintain communication throughout the process by doing regular check-ins to adapt to changing situations or employee concerns. The employee and manager will share any relevant information, like medical updates on employee progress and return to work information and plan.
3. **Understand Job Requirements:** The employer will work on clearly understanding the essence of the employee's job and identifying potential barriers in the workplace that may challenge the ability of the employee to perform their job.
4. **Reasonable Accommodation:** EHC will collaborate with the employee to identify and implement reasonable accommodations that will enable the employee to do the essential

function of their job, whether it be through adapting work hours, job duties, or the work environment. The employer will be open to various accommodation ideas that would be effective in meeting the employee's needs.

5. **Training:** Supervisors and co-workers will be trained to understand the accommodations and support the returning employee. The objective will be to promote a culture of diversity and inclusion in the workplace.
6. **Monitor:** Continue to evaluate the success of the accommodations and adjust if necessary.

If an employee requires accessible parking accommodations; they can request an EHC Accessible permit from the Human Resources Department.

## **H. Redeployment**

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

Individual accommodation plans will be consulted, as required.

## **I. Review**

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