



Policies and Procedures Documentation

Subject: **AODA Multi-Year Accessibility Plan**

Applicability **All employees**

Effective / Revised date: **January 1, 2014 / January 1, 2019**

Background and rationale

The Accessibility for Ontarians with Disabilities Act 2005 (AODA) was passed by the Ontario legislature with the goal of creating standards to improve accessibility across the province. Since 2012, the Company has been in compliance with the Accessible Customer Service Regulation under the AODA and will continue to comply with that regulation.⁽¹⁾ The Integrated Accessibility Standards Regulation ("IASR") under the AODA requires that, effective January 1, 2014, we establish, implement, maintain and document a multi-year accessibility plan, which outlines the Company's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR. This 2014-2021 accessibility plan outlines the policies and action that the Company will put into place to improve opportunities for people with disabilities. The related initiatives not only support compliance with the existing Accessibility Standards for Customer Service, but they also help us enhance accessibility in other areas:

- Information and communications
- Employment standards
- Training

Statement of commitment

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

Definitions

Company: means Buck Canada HR Services Limited.

⁽¹⁾ Please refer to our Accessibility Customer Service Policy dated November 10, 2011.

Customer service

We will continue to ensure compliance with the Accessible Customer Service Standard. We have developed accessible feedback processes to respond to inquiries and suggestions received by e-mail or telephone. This has been communicated to internal staff and is available to customers.⁽²⁾

Accessible emergency information

Where the Company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability. We have already taken the following steps:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- Workplace emergency response information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- Where required, we provide assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees.
- These individualized emergency plans have been communicated to the employees' respective managers and safety personnel, on an 'as needed' basis;
- On an ongoing and regular basis, and as per the applicable terms of the IASR, the Company will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

Training

The Company will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

We will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws by January 1, 2015.

- Establish an internal committee with the responsibility for developing appropriate training; and
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

⁽²⁾ See note ⁽¹⁾ for Background and rationale on page 1.

Information and communications

The Company is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

Feedback (s. 11 ISAR) - We will take steps to ensure existing feedback processes are accessible to people with disabilities upon request by January 1, 2015. As a general principle where accessible formats and communication supports for persons with disabilities are requested:

- Provide or arrange for the provision of such accessible formats and communication supports;
- Consult with the person making the request to determine the suitability of the accessible format or communication support; and
- Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.

Accessible Formats and Communication Supports (s. 12 IASR) – The Company shall upon request provide or arrange for the provision of accessible formats and communication supports for person with disabilities, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons. This will include:

- Consulting with the person making the request in determining the suitability of an accessible format or communication support; and
- Notifying the public about the availability of accessible formats and communication supports.

Accessible Website and Web Consent (s. 14 IASR) - We will take the following steps to make all of the Company's new websites and content on those sites conform with WCAG 2.0, Level A by January 1, 2014 and all websites and content conform with WCAG 2.0, Level AA by January 1, 2021.

There are five planned phases and timeframes:

- (i) Inventory: inventory existing web applications/sites that will be included in the assessment.
- (ii) Training & Preparation: provide staff with the tools and requirements to achieve WCAG 2.0, Level A.

- (iii) Preliminary Assessment: assess existing applications and sites listed under the Company's websites
- (iv) Achieve WCAG 2.0, Level A by January 1, 2014 for: all new applications and sites.
- (v) Achieve WCAG 2.0, Level AA by January 1, 2021 for: all new content created after January 1, 2016

Employment

Compliance date is January 1, 2016

The Company is committed to fair and accessible employment practices. We will take the following steps to notify the public and staff that, when requested, we will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.

Recruitment General (s. 22 IASR) – The Company will notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. This will include:

- A Review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- Specifying that accommodation is available for job applicants with disabilities, on the Company's website and on job postings.

Recruitment, Assessment or Selection Process (s. 23 IASR) – The Company will notify job applicants who have been invited to participate in a recruitment, assessment or selection process that, where needed, accommodations for disabilities are available, on request, to support their participation in the process. This will include:

- A review and, as necessary modification of existing recruitment policies, procedures and processes;
- Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment;
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.
- Notices to Successful Applicants (s. 24 IASR) – When making offers of employment, the Company will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes; and
- Inclusion of notification of the Company's policies on accommodating employees with disabilities in offer of employment letters.

Informing Employees of Supports (ss. 25,26 IASR) – The company will inform new and existing employees of their policies for supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This will include:

- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process;
- Keeping employees up to date on changes to existing policies on job accommodations with respect to disability;
- Where an employee with a disability so requests it, the Company will provide or arrange for provisions of suitable accessible formats and communications supports for: (i) information that is needed in order to perform the employee's job; and (ii) information that is generally available to employees in the workplace.
- In meeting the obligations to provide the information that is set out in the paragraph above, the Company will consult with the requesting employee in determining the suitability of an accessible format or communication support.

Documented Individual Accommodation Plans\Return to Work Process (ss. 28,29 IASR) – The Company will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable. This will include:

- Create policies which include steps that the Company will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability;
- Ensure that the process for the development of documented individual accommodation plans includes the following elements:
 - (i) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
 - (ii) The means by which the employee is assessed on an individual basis.
 - (iii) The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.

- (iv) The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan.
 - (v) The steps taken to protect the privacy of the employee's personal information.
 - (vi) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
 - (vii) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
 - (viii) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- If individual accommodation plans are established, ensure that they:
 - (i) If requested, include any information regarding accessible formats and communications supports provided;
 - (ii) If required, include individualized workplace emergency response information
 - (iii) Identify any other accommodation that is to be provided.

Performance Management, Career Development and Redeployment (ss. 30,31 IASR) – The Company will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities;
- When providing career development and advancement to its employees with disabilities;
- When redeploying employees with disabilities.

The company will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when (i) assessing performance; (ii) managing career development and advancement; and (iii) redeployment is required.
- Review, assess and, as necessary, include in performance management workshops, accessibility criteria;
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings;

- Take into account the accessibility needs of employees with disabilities when redeploying employees, including review and, as necessary, modification of employee transfer checklist.

Responsibilities

An accessibility committee will be appointed by the Company to review this Plan and its related practices and procedures on a periodic basis. The accessibility committee will recommend amendments and revisions to ensure on-going compliance with regulated accessibility standards and legislation. In addition, supervisors and managers shall ensure that they and their staff are familiar with this Plan.