



Accessibility for Ontarians with Disabilities Act, 2005

Accessibility Policy and Accessibility Plan

December 2014

Purpose

To establish policies, practices and procedures to ensure Guillevin is accessible to customers and to others in Ontario in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), and Ontario Regulation 191/11, Integrated Accessibility Standards Regulation (IASR).

Statement of Organizational Commitment

Guillevin is committed to meeting the accessibility needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility, and meeting accessibility requirements under the Act. Guillevin's core values compliment its commitment to treat all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

Application

This policy applies to all Ontario employees who deal with the public, other organizations, or third parties on or off Guillevin premises and applies to those employees who participate in developing Guillevin's policies, practices and procedures governing the provision of goods and services to the public.

Principles and Practices

Training

Guillevin will provide training, as soon as practicable, on the requirements of the accessibility standards of the Act and of the Human Rights Code as it pertains to persons with disabilities to:

- (a) all employees;
- (b) all persons who participate in developing Guillevin's policies; and

The training on the requirements of the accessibility standards and on the Human Rights Code referred will: be appropriate to the duties of the employees and other persons; be provided on an ongoing basis; be recorded (including the dates on which the training is provided and the number of individuals to whom it is provided); and will occur prior to January 1, 2015.

Information and communications

Feedback

Guillevin will develop processes for receiving and responding to feedback from persons with disabilities, by providing or arranging for the provision of accessible formats and communication supports, upon request.

Guillevin will notify the public about the availability of accessible formats and communication supports.

Guillevin will implement the feedback process by January 1, 2015.

Accessible Formats and Communication Supports

Guillevin will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability, at a cost that is no more than the regular cost charged to other people.

Guillevin will consult with the person making the request in determining the suitability of an accessible format or communication support.

Guillevin will notify the public about the availability of accessible formats and communication supports.

Guillevin will implement this process by January 1, 2016.

Accessible Websites and Web Content

Guillevin is committed to working towards an accessible website and website content that will comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A by January 1, 2015 and will move towards (WCAG) 2.0 at Level AA by January 1, 2021.

Employment Standards

Recruitment

Guillevin will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

During the recruitment process, Guillevin will notify candidates who participate in an assessment or selection process that accommodations are available upon request, in relation to the materials or processes to be used.

If a selected candidate requests an accommodation, Guillevin will consult with the candidate and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the candidates accessibility needs, due to disability.

Notice to Successful Applicants

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

Informing Employees of Supports

Guillevin will inform its employees of its policies to support staff 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. Guillevin will provide the required information to new staff as soon as practicable, after they commence their employment. Guillevin will provide updated information to its staff whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to their disability.

Accessible Formats and Communication Supports for Employees

When an employee requests accessible formats and communication support, we will meet with the employee to determine their accessibility needs. We will determine the most appropriate accessible format or communication support, depending on the employee's accessibility needs and the capability of Guillevin to deliver. This will be provided in a timely manner and at a cost that is not more than the regular costs charged to other people.

Documented Individual Accommodation Plans

Guillevin will have in place a documented process for the accommodation of employees with disabilities. This process will include the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which Guillevin can request an evaluation by an outside medical or other expert, at Guillevin's expense, to assist Guillevin in determining if and how accommodation can be achieved.
4. The steps taken to protect the privacy of the employee's personal information.
5. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
6. If an individual accommodation plan is denied, the reasons for the denial will be provided to the employee.
7. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Individual accommodation plans will: if requested, include any information regarding accessible formats and communications supports provided; if required, include individualized workplace emergency response information; and identify any other accommodation that is to be provided.

Return to work process

Guillevin will develop and implement 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 Guillevin will take to facilitate the return to work of employees who were absent due to disability, and, will use documented individual accommodation plans as part of the process.

Performance management

Guillevin 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. For the purposes of this policy, "performance management" means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

Career Development and Advancement

When providing career development and advancement, Guillevin will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans. For the purposes of this policy, “career development and advancement” means providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in the organization (that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them) and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of both.

Redeployment

Guillevin will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. For the purposes of this policy, “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.

The target date for all Employment Standards outlined in this portion of this policy is January 1, 2016.

ACCESSIBILITY PLAN

The following plan will be reviewed annually until January 1, 2017, and then every 5 years thereafter, by the Regional Vice President and Human Resources Designate

Barrier Type	Examples	Action Required	Completion Date and by Whom
Attitudinal	Employees who do not know how to communicate with people with disabilities	<ul style="list-style-type: none"> • Provide training to all employees per policy and legislative requirements to educate and facilitate communication with people with disabilities 	January 1, 2015 Regional Vice President /Manager
Information & Communications: Accessible Websites and Web content	Website not accessible	<ul style="list-style-type: none"> • All new websites, or a significant 'refresh' to an existing website, will conform to the World Wide Web Consortium Web content Accessibility Guidelines (WCAG), other than <ul style="list-style-type: none"> i. Success criteria 1.2.4. Captions (Live), and ii. Success criteria 1.2.5 Audio Descriptions (pre-recorded) 	WCAG 2.0 Level A – January , 2014 and WCAG 2.0 Level AA – January 1, 2016 Web Developer/IT Manager
Information & Communications: Accessible formats And communication supports	Difficulties receiving information: in person or by telephone, difficulties interacting with employees, Inadequate or incomprehensible signage, difficulties reading brochures, forms, manuals, fax transmission, paper catalogues/flyers.	<ul style="list-style-type: none"> • Internal audit of profit centers to assess any potential communication barriers <ul style="list-style-type: none"> ○ Develop processes to provide and receive information and communications in ways that are accessible to people with disabilities 	January 1, 2016 Regional Vice President/HR Designate

ACCESSIBILITY PLAN (continued)

Barrier Type	Examples	Action Required	Completion Date and by Whom
Employment Standard: Recruitment	Difficulties for job applicants to participate in selection process	<ul style="list-style-type: none"> • Ascertain barriers in recruitment process <ul style="list-style-type: none"> ○ Develop plans to accommodate job applicants with disabilities 	January 1, 2016 Regional Vice President/HR Designate
Employment Standard: Employees with disabilities	Employees have difficulty in doing their job as well as possible, due to inaccessible format and communication supports, or rules and regulations	<ul style="list-style-type: none"> • Have a written process to document individual accommodation plans for employees with disabilities 	January 1, 2016 Regional Vice President/HR Designate
Architectural	Building design Exterior to a building, interior of a building, washrooms, parking areas, hallways, floors, stairs, lobbies/entranceways, offices, lighting, sidewalks	<ul style="list-style-type: none"> • For new profit centers or those undergoing redevelopment, ensure all walkways and public spaces comply with the IASR Ont. Reg. 191/11 (“Regulation”) that includes Ont. Reg. 413/12 (design of Public Spaces) 	From January 1, 2017 onward Regional Vice President/Profit Center Manager
Physical	Objects added to the environment: Doors, furniture, workstations, bathroom hardware (knobs, locks), product displays, counter height (counters in bathrooms and counters in profit centers for servicing customers)	<ul style="list-style-type: none"> • Newly constructed profit centers or those undergoing redevelopment, will ensure all service counters and queuing or waiting areas comply with the Act and O. Reg. 413/12 and are barrier free <ul style="list-style-type: none"> ○ All Ontario employees will receive awareness training to facilitate access and remove barriers for those with disabilities 	From January 1, 2017 onward Regional Vice President/Profit Center Manager