

SUBJECT:	Integrated Accessibility Standards Regulation (IASR) Employment Policy	Page 1 of 6	
ORIGINAL ISSUE:	December 2014	APPROV. AUTH:	Chief Executive Officer
PAST REVISIONS:	Jan 2020	RESPONSIBILITY:	Human Resources
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CURRENT	March 2024	DIVISION:	Hellenic Home for the Aged
DATE:			

### PREEAMBLE:

This policy is intended to meet the requirements of the <u>Integrated Accessibility</u> <u>Standards, Ontario Regulation 191/11</u> for the Employment Standard set forth under the <u>Accessibility for Ontarians with Disabilities Act, 2005</u>. This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Hellenic Home for the Aged 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
- F. Performance Management and Career Development and Advancement
- G. Return to Work

## H. Redeployment

I. <u>Review</u>

# 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

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

- Hellenic Home 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.
- Hellenic Home 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.
- Hellenic Home will review and update its accessibility plan 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 to the Joint Occupational Health and Safety Committee as well as Senior Management on the progress of the steps taken to implement Hellenic Home' accessibility plan. Progress will be documented in minutes at both committees, in 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

Hellenic Home 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 3<sup>rd</sup> party contractors. The departments that are in contact with these parties are responsible for adhering to the policy.

## Training Requirements

Hellenic Home will provide training for its employees and volunteers regarding the IASR and the <u>Ontario Human Rights Code</u> as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Hellenic Home's policies, and all other persons who provide goods, services or facilities on behalf of Hellenic Home.

Training will be provided as soon as is reasonably practicable and will be done on a recurring basis to ensure all parties are familiar with all aspects of AODA. Training will be provided on an ongoing basis to new employees including at orientation and as changes to Hellenic Home's accessibility policies occur.

### Self-Serve Kiosks

Hellenic Home will incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

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

Hellenic Home will notify employees and the public about the availability of accommodation for job applicants who have disabilities. The statement below is embedded all job postings:

Please note that Hellenic Home abides by the Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA). We can accommodate candidates during the recruitment and selection process including any testing component if required for all jobs posted on this website. If you are ultimately selected for the position, accommodations can be provided if possible. Please let us know if you need assistance at any time during the recruitment process.

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

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

A reference to the AODA program will be added to new hire letters of offer.

# C. Accessible Formats and Communication Supports for Employees

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

Hellenic Home will will consult with employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs due to disability Upon request Hellenic Home will provide or arrange for the provision of accessible formats, communication or other supports for the following:

- Physical modifications to the workplace;
- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Hellenic Home 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

Each department within Hellenic Home is responsible for ensuring that emergency protocols for staff that need accommodations are reflected in their fire/ safety plans

Where required, Hellenic Home will create individual workplace emergency response information for employees with disabilities. This personalized employee response plan 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. On an annual basis, management will remind employees to self-identify if a personalized employee response is required.

When an employee raises a requirement, they must then complete the Emergency Information Self-Assessment Form. That form is to be provided by email, or hardcopy to their manager. The manager is then responsible to work with the employee to complete the Personalized Emergency Response Plan, and obtain consent to share the information with individuals that would play a role in the emergency including Management, Human Resources; and any colleagues as necessary.

This information will be reviewed when:

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

# E. Documented Individual Accommodation Plans

Hellenic Home has processes for documenting individual accommodation plans for employees with disabilities. The process fof these accommodation plans include specific elements, including:

- The ways in which the employee can participate in the development of the plan
- How 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 employer's expense) to determine if accommodations can be achieved.
- 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
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs

# F. Performance Management and Career Development and Advancement

Hellenic Home 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/designate.

# G. Return to Work

Hellenic Home 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.

The return-to-work process will outline the steps Hellenic Home 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

Hellenic Home has two (2) job sites.

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 Hellenic Home's current practices as well as legislative requirements.

# PROCEDURE:

## 1. Records

Hellenic Home will maintain records on the training provided.

2. Recruitment

Hellenic Home notifies job applicants and the public that accommodations can be made during the recruitment process. The Human Resources Department will contact all external candidates during the recruitment process. External candidates will be told verbally that Hellenic Home 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
- Additional time and/or additional clarification/assistance to answer questions posed in the interview if needed
- Will be informed during the interview that Hellenic Home will accommodate the successful candidate should they require accommodations and that an individual plan will be created.
- 3. Records regarding AODA compliance will be kept by Human Resources/Administrator.
- 4. Departments will inform HR/designate should any of our external partners (example Agencies) fail to support/meet standards outlined under AODA.
- 5. Records of Performance Reviews will be kept in each employee's file located in the Finance Department office. Reviews will be audited randomly to ensure compliance under AODA.
- 6. Any changes required to an employee's job will be documented in writing. Discussions should involve Human Resources and the Union (where applicable).

# **DEFINITIONS:**

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

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

<u>Kiosk</u> – 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.

<u>Performance Management</u> – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

<u>Redeployment</u> – 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. Integrated Accessibility Standards, Ontario Regulation 191/11 Ontario Human Rights Code Ontario Employment Standards Act

# CROSS-REFERENCE:

Hellenic Home Accessibility Plan Customer Service Policy on Providing Goods and Service to People with Disabilities