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AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

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

Definitions

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

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.

Kiosk – 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.

Performance Management – Activities related to assessing and improving Partner performance, productivity and effectiveness with the goal of facilitating Partner success.

Redeployment – The reassignment of Partners 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.

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 Partners
- D. Workplace Emergency Response Information
- E. Documented Individual Accommodation Plans
- F. Performance Management and Career Development and Advancement



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G. Return to Work

H. Redeployment

I. Review

A. General Requirements

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

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

Brookstreet 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 available in an accessible format, upon request.

Brookstreet will establish, implement, maintain and document policies and strategies to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Brookstreet 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. Annual status reports will be prepared that will report on the progress of the steps taken to implement Brookstreet's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

Brookstreet 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.

Training Requirements

Brookstreet will provide training for its Partners 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 Brookstreet's policies, and all other persons who provide goods, services or facilities on behalf of Brookstreet.

Training will be provided as soon as is reasonably practicable, but no later than 90 days from a Partner's start date. Training will be provided on an ongoing basis to new Partners and as changes to Brookstreet's accessibility policies occur.



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Records

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

Self-Serve Kiosks

Brookstreet will incorporate accessibility features when designing, procuring or acquiring self-service kiosks. Brookstreet will always be aware of the accessibility features of self-service kiosks for persons with disabilities.

B. Recruitment, Assessment and Selection

Brookstreet provides accommodations to Partners and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be provided these accommodations that are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Brookstreet will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be provided with Brookstreet's policies and supports for accommodating people with disabilities.

C. Accessible Formats and Communication Supports for Partners

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

If an Partner with a disability requests it, Brookstreet 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 Partners in the workplace.

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

D. Workplace Emergency Response Information

Where required, Brookstreet will create individual workplace emergency response information for Partners 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 Partner.



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This information will be reviewed when:

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

E. Documented Individual Accommodation Plans

Brookstreet will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

Brookstreet must also develop and have in place written processes for documenting individual accommodation plans for Partners with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the Partner can participate in the development of the plan;
- The means by which the Partner is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an Partner can request the participation of a representative from their bargaining agent or other representative from the workplace (if the Partner is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the Partner's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the Partner; and
- The means of providing the accommodation plan in an accessible format, based on the Partner's accessibility needs.
- The individual accommodation will also:
 - Include information regarding accessible formats and communication supports upon request;
 - Where needed, include individualized workplace emergency response information; and
 - Outline all other accommodation provided.



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F. Performance Management and Career Development and Advancement

Brookstreet will consider the accessibility needs of Partners 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

Brookstreet will develop and implement return to work processes for Partners 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 Brookstreet will take to facilitate the Partner's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

H. Redeployment

The accessibility needs of Partners 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 Brookstreet's current practices as well as legislative requirements.

Patrice S. Basille
Executive Vice-President and General Manager

October 19, 2015

Date