

# INTEGRATED

ACCESSIBILITY STANDARDS POLICY

## INTEGRATED ACCESSIBILITY STANDARDS POLICY

The following policy has been established by Govan Brown to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the Accessibility for Ontarians with Disabilities Act, 2005.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications, and employment.

Govan Brown is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

### COMMITMENT

Govan Brown 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 persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act. This policy will be implemented in accordance with the time frames established by the Regulation.

### ACCESSIBILITY PLAN

(This plan can be found below under "INTEGRATED ACCESSIBILITY STANDARDS MULTI-YEAR PLAN")

Govan Brown will develop, maintain and document an Accessibility Plan outlining our strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on our website. Upon request, Govan Brown will provide a copy of the Accessibility Plan in an accessible format.

### SELF SERVICE KIOSKS

Govan Brown will have consideration for accessibility when designing, procuring or acquiring our self-serve kiosks to better serve persons with disabilities. Self-service kiosks are not offered at Govan Brown.

### TRAINING EMPLOYEES

Govan Brown will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to: during their visit.

- all its Employees;
- all persons who participate in developing our policies; and,
- all other persons who provide goods, services or facilities on behalf of Govan Brown

The training will be appropriate to the duties of the Employees and other persons. Employees will be trained when changes are made to the accessibility policy. Govan Brown will keep a record of the training it provides.

## INFORMATION AND COMMUNICATION STANDARDS

### FEEDBACK

Govan Brown will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing or arranging for the provision of, accessible formats and communications supports upon request.

### ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Upon request, Govan Brown will provide, or will 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.

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

## ACCESSIBLE WEBSITES AND WEB CONTENT

Govan Brown will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

## EMPLOYMENT STANDARDS

### RECRUITMENT

Govan Brown will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### RECRUITMENT, ASSESSMENT OR SELECTION PROCESS

Govan Brown will notify job applicants, when they are individually selected to participate further 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 applicant requests an accommodation, Govan Brown will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

### NOTICE TO SUCCESSFUL APPLICANTS

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

### INFORMING EMPLOYEES OF SUPPORTS

Govan Brown will continue to inform its employees of its policies (and any updates to those policies) used to support Employees with disabilities, including policies on the provision of job accommodations that take into account an Employee's accessibility needs due to disability. This information will be provided to new Employees as soon as practicable after commencing employment.

### ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES

Upon the request of an Employee with a disability, Govan Brown will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Govan Brown will consult with the Employee making the request.

### WORKPLACE EMERGENCY RESPONSE INFORMATION

Govan Brown will provide individualized workplace emergency response information to Employees who have a disability, if the disability is such that the individualized information is necessary, and if Govan Brown is aware of the need for accommodation due to the Employee's disability. Govan Brown will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the Employee requires assistance, Govan Brown will, with the consent of the Employee, provide the workplace emergency response information to the person designated by Govan Brown to provide assistance to the Employee.

Govan Brown will review the individualized workplace emergency response information when the Employee moves to a different location in the organization, when the Employee's overall accommodation needs or plans are reviewed.

### DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS

Govan Brown will maintain a written process for the development of documented individual accommodation plans for Employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

## **RETURN TO WORK PROCESS**

Govan Brown maintains a documented return to work process for its Employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps Govan Brown will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (ie., the Workplace Safety Insurance Act, 1997)

## **PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT & REDEPLOYMENT**

Govan Brown will take into account the accessibility needs of Employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to Employees, or when redeploying Employees.

## **QUESTIONS ABOUT THIS POLICY**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

Sarah Paul  
Director of Human Resources  
416.703.5100 x 229  
spaul@govanbrown.com



## AODA MULTI-YEAR ACCESSIBILITY PLAN

In accordance with our organizational obligations under the AODA, Integrated Accessibility Standards Regulation (O. Reg. 191/11, s. 4 (1) (2)), Govan Brown has prepared this multi-year plan which contains the deliverables and activities that will be worked on over the next 3 to 5 years. Govan Brown recognizes that the AODA obligations are far-reaching, with varying levels of responsibility across the organization, which is why we have taken a strategic approach to implementation.

ACCESSIBILITY REQUIREMENT	DESCRIPTION	DELIVERABLES	COMPLIANCE DATE
<b>AODA MULTI-YEAR ACCESSIBILITY PLAN</b>			
<b>ESTABLISHMENT OF ACCESSIBILITY POLICIES</b>	<ul style="list-style-type: none"> <li>● Establish policies, practices and procedures on providing goods or services to persons with disabilities according to principles set out in regulation</li> <li>● Create document describing policies, procedures and practices; provide upon request in alternative format</li> <li>● Communicate with a person with a disability in a manner that takes into account their disability</li> </ul>	<ul style="list-style-type: none"> <li>● Establish Customer Service Policy</li> <li>● Ensure document developed is accessible</li> </ul>	<b>Jan. 1, 2012</b>
<b>USE OF SERVICE ANIMALS AND SUPPORT PERSONS</b>	<ul style="list-style-type: none"> <li>● Establish policies, practices and procedures around a person with a disability being accompanied by a service animal or support person</li> <li>● Create document describing policies, practices and procedures; provide upon request</li> </ul>	<ul style="list-style-type: none"> <li>● Include a commitment statement in CSS policy</li> </ul>	<b>Jan. 1, 2012</b>
<b>NOTICE OF TEMPORARY DISRUPTIONS</b>	<ul style="list-style-type: none"> <li>● Provide public notice of disruption in facilities or services by ;posting on premises or on website</li> <li>● Include in notice reason for disruption, anticipated duration, and description of alternatives, if available</li> <li>● Create a document describing steps to be taken for temporary disruptions; provide upon request</li> </ul>	<ul style="list-style-type: none"> <li>● Post notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption</li> <li>● Contact clients/guests with appointments; verbally notify clients/guests when they are making an appointment; or by any other method that may be reasonable under the circumstances</li> </ul>	<b>Jan. 1, 2012</b>

<p><b>NOTICE OF TEMPORARY DISRUPTIONS</b></p>	<p>Provide training to:</p> <ul style="list-style-type: none"> <li>● Employees who deal with the public or others on behalf of Govan Brown;</li> <li>● Everyone who participates in developing the organization's policies, practices and procedures governing providing goods or services to public or others;</li> <li>● Include training on specific topics set out in the regulation;</li> <li>● Provide training on ongoing basis to reflect any changes to policies, practices and procedures;</li> <li>● Create document describing training policy, summary of content and details of when provided;</li> <li>● Keep records of training provided, including dates and number trained.</li> </ul>	<ul style="list-style-type: none"> <li>● Develop CSS training policy</li> <li>● Develop CSS training</li> <li>● Develop process to provide training on an on-going basis</li> <li>● Develop process to keep records of training, dates and numbers trained</li> </ul>	<p><b>Jan. 1, 2012</b></p>
<p><b>FEEDBACK PROCESS</b></p>	<ul style="list-style-type: none"> <li>● Establish process for receiving and responding to feedback; make information about process publicly available</li> <li>● Create document describing process; make available on request</li> </ul>	<ul style="list-style-type: none"> <li>● Establish process</li> </ul>	<p><b>Jan. 1, 2012</b></p>
<p><b>NOTICE OF AVAILABILITY AND FORMAT OF DOCUMENTS</b></p>	<ul style="list-style-type: none"> <li>● Notify customers that the documents covered by this regulation are available upon request by posting conspicuously on premises, website or other reasonable method</li> </ul>	<ul style="list-style-type: none"> <li>● Include required notice at end of CSS policy and all documents</li> </ul>	<p><b>Jan. 1, 2012</b></p>
<p><b>EMERGENCY AND PUBLIC SAFETY INFORMATION</b></p>	<ul style="list-style-type: none"> <li>● Make information available to public in an accessible format or with appropriate communication supports, upon request</li> </ul>	<ul style="list-style-type: none"> <li>● Update and ensure Emergency Procedures Manual is in an accessible format</li> </ul>	<p><b>Jan. 1, 2012</b></p>
<p><b>WORKPLACE EMERGENCY RESPONSE INFORMATION</b></p>	<ul style="list-style-type: none"> <li>● Provide individualized workplace emergency response information to employees who have a disability if disability is such that it is necessary</li> </ul>	<ul style="list-style-type: none"> <li>● Develop a process for the company</li> </ul>	<p><b>Jan. 1, 2012</b></p>
<p><b>GENERAL REQUIREMENTS</b></p>			
<p><b>ACCESSIBILITY POLICIES</b></p>	<ul style="list-style-type: none"> <li>● Develop, implement and maintain policies about what Govan Brown will do to meet the IASR requirements and become more accessible</li> </ul>	<ul style="list-style-type: none"> <li>● Prepare a policy</li> </ul>	<p><b>Jan. 1, 2014</b></p>

<p><b>ACCESSIBILITY PLANS</b></p>	<ul style="list-style-type: none"> <li>● Create multi-year plan (5 years) outlining strategic direction to prevent and remove barriers, post plan and make accessible. Govan Brown will: <ul style="list-style-type: none"> <li>a) Develop, implement and maintain a multi-year plan which outlines a strategy to prevent and remove barriers, and meet the current and future requirements of the AODA (Accessibility for Ontarians with Disabilities Act);</li> <li>b) Assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities;</li> <li>c) Post the plan on our website, and provide all information relating to the plan in alternative formats, upon request;</li> <li>d) Review and update the accessibility plan at least once every 5 years.</li> </ul> </li> </ul>	<p><b>Multi-year plan</b></p> <ul style="list-style-type: none"> <li>● Prepare 5-year plan</li> </ul>	<p><b>Jan. 1, 2014</b></p>
<p><b>THE PROVISION OF GOODS AND SERVICES TO PERSONS WITH DISABILITIES</b></p>	<ul style="list-style-type: none"> <li>● Ensure that all clients/guests receive the same value and quality</li> <li>● Allow clients/guests with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk</li> <li>● Use alternative methods when possible to ensure that clients/guests with disabilities have access to the same services, in the same place and in a similar manner</li> <li>● Take into account individual needs when providing goods and services</li> <li>● Communicate in a manner that takes into account the client/guest's disability</li> </ul>	<ul style="list-style-type: none"> <li>● Develop accessibility-related resources and information</li> </ul>	<p><b>Jan. 1, 2014</b></p>
<p><b>SELF-SERVE KIOSKS</b></p>	<ul style="list-style-type: none"> <li>● Govan Brown will have consideration for accessibility when designing, procuring or acquiring self-service kiosks to better serve persons with disabilities</li> </ul>	<ul style="list-style-type: none"> <li>● Self-service kiosks are not currently offered at Govan Brown</li> </ul>	<p><b>Jan. 1, 2015</b></p>

## GENERAL REQUIREMENTS

<b>TRAINING</b>	<ul style="list-style-type: none"> <li>● Train all employees, volunteers, persons developing policies, and all others providing goods, services or facilities on behalf of Govan Brown on requirements of IASR standards and on OHRC as it pertains to disabilities</li> <li>● Ensure training on standards and OHRC is appropriate to duties of employees, volunteers and others</li> <li>● Provide ongoing training in respect to any changes.</li> <li>● Keep record of training, dates trained, number trained</li> </ul>	<ul style="list-style-type: none"> <li>● Source and or develop training to meet requirement</li> </ul>	<p style="text-align: center;"><b>Jan. 1, 2015</b></p>
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## INFORMATION AND COMMUNICATION STANDARDS

<b>FEEDBACK PROCESS</b>	<ul style="list-style-type: none"> <li>● Govan Brown will ensure that existing feedback processes continue to remain accessible to people with disabilities by providing or arranging for the provision of accessible formats</li> <li>● Ensure feedback processes are accessible by providing accessible formats or arranging for communication supports, upon request</li> <li>● The public will be notified of availability of accessible formats and communication supports</li> </ul>	<ul style="list-style-type: none"> <li>● Feedback process has been established under the customer service standards</li> </ul>	<p style="text-align: center;"><b>Jan. 1, 2015</b></p>
<b>ACCESSIBLE FORMATS AND COMMUNICATION SUPPORT</b>	<ul style="list-style-type: none"> <li>● Upon request, provide or arrange to provide accessible formats and communication supports for persons with disabilities</li> <li>● In a timely manner that takes into account the person's accessibility needs</li> <li>● At a cost that is no more that the regular cost charged to other persons</li> </ul>	<ul style="list-style-type: none"> <li>● We will consult with the person making the request to determine the suitability of an accessible format or communication support</li> </ul>	<p style="text-align: center;"><b>Jan. 1, 2016</b></p>
<b>EMERGENCY PROCEDURES, PLANS, OR PUBLIC SAFETY INFORMATION</b>	<ul style="list-style-type: none"> <li>● Govan Brown, in cooperation with the Joint Health &amp; Safety committee, will assess our current emergency procedures for barriers to persons with disabilities during an emergency</li> </ul>	<ul style="list-style-type: none"> <li>● Govan Brown will provide Clients and Guests with publicly available emergency information in an accessible format, upon request</li> </ul>	<p style="text-align: center;"><b>Jan. 1, 2012</b></p>



	<ul style="list-style-type: none"> <li>We will update our procedures to ensure that all staff remember to take into consideration the various disabilities, and ensure their needs can be met in the event of an emergency. We will also provide employees with disabilities with individualized emergency response information, when necessary</li> </ul>		
<b>NEW INTERNET WEBSITES AND WEB CONTENT</b>	<ul style="list-style-type: none"> <li>Conform to WCAG 2.0, initially Level A. (Applies to websites, web content and web-based applications that we control directly or through contractual relationship)</li> </ul>	<ul style="list-style-type: none"> <li>Ensure content is accessible (level A compliant)</li> </ul>	<b>Jan. 1, 2014</b>
<b>EMPLOYMENT STANDARDS</b>			
<b>RECRUITMENT</b>	<ul style="list-style-type: none"> <li>During the recruitment process, Govan Brown will notify applicants about the availability of accommodation. We will also do the following: <ul style="list-style-type: none"> <li>(a) Notify job applicants selected in hiring process that accommodations are available upon request in relation to material or processes to be used;</li> <li>(b) Consult with the applicant, or arrange to provide the accommodation.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Prepare communication to notify potential applications about accommodation process</li> <li>Consult with potential applications when a request is made</li> <li>Accommodate applicants during the hiring process, upon request</li> </ul>	<b>Jan. 1, 2016</b>
<b>DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS</b>	<p>Govan Brown will develop and implement a written process for the development of individual accommodation plans for employees with disabilities.</p> <p>The process for the development of documented individual accommodation plans must include the following elements:</p> <ul style="list-style-type: none"> <li>The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;</li> <li>The means by which the employee is assessed on an individual basis.</li> </ul>	<ul style="list-style-type: none"> <li>Develop a written process for individualized accommodation plans (IAP)</li> </ul>	<b>Jan. 1, 2016</b>

	<ul style="list-style-type: none"> <li>● 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</li> <li>● The steps taken to protect the privacy of the employee's personal information</li> <li>● The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done</li> <li>● If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee</li> <li>● The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability</li> </ul>		
<b>EMPLOYEES RETURNING TO WORK</b>	<ul style="list-style-type: none"> <li>● Establish a documented return-to-work process.</li> <li>● Process to facilitate RTW and document IAP</li> </ul>	<ul style="list-style-type: none"> <li>● Prepare a documented return-to-work process in place</li> <li>● Incorporate IAP in RTW process</li> </ul>	<b>Jan. 1, 2016</b>
<b>PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND REDEPLOYMENT</b>	<ul style="list-style-type: none"> <li>● Govan Brown will take into account disability and accommodation plan when using performance management, when redeploying employees</li> </ul>	<ul style="list-style-type: none"> <li>● Prepare document outlining process to ensure IAP is involved during performance management and redeployment</li> </ul>	<b>Jan. 1, 2016</b>
<b>INFORMATION AND COMMUNICATIONS STANDARDS</b>			
<b>ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS</b>	Govan Brown will arrange for accessible formats and communication supports (upon request, in a timely manner, at cost that is no more than regular charge to others).	<ul style="list-style-type: none"> <li>● Prepare a process to facilitate this obligation</li> </ul>	<b>Jan. 1, 2016</b>
<b>ALL INTERNET WEBSITES AND WEB CONTENT (2021)</b>	<ul style="list-style-type: none"> <li>● Must comply with WCAG 2.0 Level AA (excludes live captioning, audio description)</li> </ul>	<ul style="list-style-type: none"> <li>● All websites and web content to confirm to Level AA</li> </ul>	<b>Jan. 1, 2021</b>