

## **STATEMENT of POLICY and PROCEDURE**

### **Multi-Year Accessibility Plan for Thordon Bearings Inc.**

#### **Policy**

Thordon Bearings Inc. will establish, implement and maintain a multi-year accessibility plan, which outlines the company's strategy to prevent and remove barriers and meet its requirements.

The multi-year accessibility plan will indicate how Thordon Bearings Inc. intends to implement the requirements of the Integrated Regulation within legislated timelines. It will also address the identification, removal and prevention of barriers to people with disabilities in the organization.

Specifically, the multi-year plan will:

- a) Provide a framework for developing cohesive accessibility initiatives which identify, remove and prevent barriers
- b) Set annual goals for specific improvements to accessibility
- c) Establish action plans for meeting those goals and initiating accountability at various levels
- d) Seek input and suggestions from employees

#### **Purpose**

The purpose of this Statement of Policy and Procedure is to create a workable multi-year accessibility plan that outlines Thordon Bearings strategy to prevent and remove barriers and meet its requirements under the Integrated Regulation. This plan will meet the needs of all employees, contractors, sub-contractors and visitors with disabilities, and provide a mechanism for planning, reviewing and evaluating the implementation of the AODA Accessibility Standards.

#### **Scope**

This policy applies to all employees, contractors, sub-contractors and visitors of Thordon Bearings Inc.

#### **Responsibility**

It is the responsibility of Thordon Bearings Inc. to assess current policies, practices and procedures, premises and information and communication systems to identify barriers for persons with disabilities.

It is the responsibility of Thordon Bearings Inc. to address the identified barriers and develop a five-year plan for the removal and prevention of these barriers.

It is the responsibility of Thordon Bearings Inc. to post the plan in a visible place on the premises and on the corporate website.

It is the responsibility of Thordon Bearings Inc. to provide all information relating to the plan in alternative formats upon request.

It is the responsibility of Thordon Bearings Inc. to review and update the plan at least once every five years.

It is the responsibility of the Human Resources Manager to:

- a) Identify and understand structures, laws, rules, policies, programs, practices and services of, or applicable to, Thordon Bearings Inc. regarding accessibility and barriers to access that people with disabilities may encounter.
- b) Ensure Thordon Bearings Inc. meets its obligations under the AODA to develop a multi-year accessibility plan and other requirements as required under the law.
- c) Develop and implement an accessibility plan that includes, among other things:
  - The identification and prioritization of barriers that need to be addressed as per established standards over the next year and subsequent years through consultation with people with disabilities, and employees
  - An annual action plan to eliminate barriers as per established standard and priority
  - Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates
  - Update the multi-year accessibility plan and make it available to the general public
  - Act as the organization's ambassador in the elimination of barriers and promotion of accessibility
  - Communicate all documents (e.g. policies, plans) to employees of Thordon Bearings Inc. and ensure they are trained on accessibility issues and the policies and plans as required by law
  - Prepare and submit the necessary reports and documentation to management and the government
  - Examine and monitor progress to ensure the plan is being implemented accordingly

## **Definitions**

***Accessible formats*** – may include, but are not limited to, large print, recorded audio and electronic formats, and other formats usable by persons with disabilities

***Accommodation*** – means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs

***Communication supports*** – may include, but are not limited to captioning, alternative communication supports, and other supports that facilitate effective communications

***Communications*** – means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received

***Dignity*** – means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons

***Equal Opportunity*** – means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others

***Independence*** – means when a person is able to do things on their own without unnecessary help or interference from others

***Information*** – includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning

***Integration*** – means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternative measure is necessary to enable the individual to access goods or services

***Reasonable efforts*** – means taking approaches that meet the required needs of the individual

## **REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE**

### **Accessibility for Ontarians with Disabilities Act, 2005**

Integrated Accessibility Standards, Ontario Regulation 191/11

Statement of Policy & Procedure - Statement of Organizational Commitment for Thordon Bearings Inc

## Procedures

### Multi-year accessibility plan – (Compliance date – Jan 1, 2014)

- Thordon Bearings will work to improve accessibility by developing a multi-year accessibility plan that conforms to the Regulation which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA and its standards.
- Thordon Bearings will report annually on the progress and implementation of the plan, posting this information on the company's bulletin boards and on the company's website. The plan will be provided in alternative formats upon request.
- The multi-year plan must be reviewed and updated at a minimum of once every five years.
- The plan will be publically posted on the company's website and will also be posted on the company's bulletin boards.
- Upon request, the plan will be provided in accessible formats.
- When a person with a disability makes a request for an alternative accessible format or communication support, that person must be consulted as to their needs. The plan must be provided in a timely manner and the cost of providing the plan in an accessible format must not be more than the regular cost charged to other people.

### Self-service kiosks – N/A

### Training – (Compliance date –Jan 1, 2015)

Thordon Bearings Inc. will ensure that by January 1, 2015, training is provided to all employees who deal with customers and the public on the company's behalf, and to persons participating in the development and approval of its policies, practices and procedures on the requirements of the Regulation and on the **Human Rights Code** as it pertains to persons with disabilities.

The type and intensity of training on the requirements of accessibility standards and the **Human Rights Code** will vary according to the duties of the employee, and others.

Thordon Bearings Inc. will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

Training will re-occur when there are changes to the accessibility policies.

## **Requirements under the Information and Communications Standard – (Compliance date – Jan 1, 2014)**

### **Commitment to accessibility policies, practices and procedures**

Thordon Bearings Inc. will commit to making information and communication systems and platforms accessible to persons with disabilities and address how it will be achieved.

Thordon Bearings Inc. will establish an accessibility policy, procedures and practices for providing accessible information and communications that take into account a person's disability when communicating or providing information. This includes:

- Posting the policy on bulletin boards and on the corporate website
- Providing the policy in an alternative format upon request
- Ensuring that the cost of providing this policy in an accessible format is not more than the regular cost charged to other people
- Reviewing the policy at least annually or when there are changes to the law or to practices and procedures or when an incident/breach occurs.

### **Multi-year plan – (compliance date – Jan 1, 2014)**

Thordon Bearings will include the requirements under the information and communications standard in its multi-year plan, which outlines the organization's strategy to provide accessible information and communications. This includes:

- Assessing barriers to information and communications systems
- Determining the accessibility of the company's information systems
- Establishing a practice that company documents be created in a structured electronic format to allow for easier conversion to accessible formats
- Establishing a company standard for documents that will be as accessible as possible without need for accessible formats (i.e., font style, font size, colour contrast, plain language)

- Posting the plan on company bulletin boards and the corporate website and providing the plan in accessible format upon request
- Reviewing and updating the plan at least once every five years

### **Feedback (compliance date – Jan 1, 2015)**

Thordon Bearings will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This includes:

- When an accessible format is requested, the person making the request is consulted
- The public is notified about the availability of accessible formats and communication supports
- Reviewing the policy at least annually or when there are changes to the law or to practices and procedures or when an incident/breach occurs

### **Providing information and communication in accessible formats and with communications support (compliance date – Jan 1, 2016)**

Thordon Bearings Inc. 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. This includes:

- Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist within Thordon Bearings Inc.
- Explaining how Thordon Bearings Inc. will produce and deliver alternately formatted material essential to Thordon Bearings Inc. visitors and customers, and what those materials are
- Notifying the public about the availability of accessible formats and communications supports
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested

- Have a process in place for visitors and customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible
- Posting this information on the company's bulletin boards and corporate website
- If the information or communications are unconvertible, upon request, Thordon Bearings Inc. will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications
- Reviewing this process at least annually or when there are changes to the law or to practices and procedures or when an incident/breach occurs

### **Accessible websites and web content (compliance date – Jan 1, 2014)**

Thordon Bearings will ensure that all new websites and web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to Level AA by 2021. This includes:

- Conducting an assessment of the company's website and testing for accessibility
- Committing and planning to make the website is accessible and outline the course of actions and timelines needed to achieve web accessibility based on the results of the assessment and compliance with the law
- Developing accessible website and Web content that conforms to WCAG 2.0 Level A and eventually that conforms to the WCAG 2.0 level AA
- Monitoring website accessibility and compliance with the guidelines and the law

### **Requirements under the employment standard**

Thordon Bearings Inc. will include the requirements under the employment standard in its multi-year plan, including the following:

- Workplace emergency response information
- Assessment of barriers in employment
- Support information for new employees
- Accessible formats and communication
- Documenting individualized plans

- Performance assessment, career development, advancement and redeployment

### **Workplace emergency response information (compliance date – Jan 1, 2012)**

Thordon Bearings Inc. will provide individualized workplace emergency response information to employees who have disclosed a disability.

With the employee's consent, provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

The individualized workplace emergency response information will be reviewed:

- When the employee moves to a different location in the company
- When the employee's overall accommodations needs or plans are reviewed, and
- When the employer reviews its general emergency response policies

### **Assessment of barriers in employment**

Thordon Bearings will identify, remove and prevent barriers in employment by evaluating existing policies and procedures as well as the overall workplace.

### **Recruitment (compliance date – Jan 1, 2016)**

Thordon Bearings Inc. will promote employment opportunities for the designated groups including persons with disabilities.

On the company's website and in job advertisements, specify that accommodation is available for job applicants with disabilities.

Thordon Bearings will inform candidates about the availability of accommodations:

- When called for an interview
- During the selection process
- At the time of job offer
- At orientation

### **Support information for new employees (compliance date – Jan 1, 2016)**

Thordon Bearings Inc. will inform employees of policies and supports for employees with disabilities as soon as practicable after new employees begin employment.



Thordon Bearings Inc. will update information provided to employees as policies change.

### **Accessible formats and communication (compliance date – Jan 1, 2016)**

Thordon Bearings will, upon request by an employee with a disability, provide accessible formats and communication supports for information in the workplace in consultation with the employee making the request.

### **Document individualized plans (compliance date – Jan 1, 2016)**

Thordon Bearings will develop a written process for developing individual accommodation plans for employees with disabilities.

Thordon Bearings will develop and implement a return-to-work process for employees absent due to disabilities who require accommodation to return to work.

### **Performance assessment, career development, advancement, and redeployment (compliance date – Jan 1, 2016)**

By Jan 1, 2016, Thordon Bearings Inc. will ensure that its procedures take into account the accessibility needs of employees with disabilities and their individual accommodation plans:

- When assessing their performance
- In managing their career development and advancement
- When redeploying them

### **Contact Information**

If you have questions on this policy, want to provide feedback or have a complaint, the Human Resources Manager for Thordon Bearings Inc. should be contacted to deal with such matters and can be reached at:

[donnam@thomson-gordon.com](mailto:donnam@thomson-gordon.com)

905-319-6878 – direct line or

905-335-1440 ext 218