



Title: <b>AODA and Accessibility Policy</b>	Date of Issue: December 2011
Approved by: Vice President – Craig Seibel	Review / Revise Date: <b>November 29/2023</b> , April 13/ 2020 June, Jan 2/2015
Location: Office – Shop – Vehicles – Job Site	

---

**PURPOSE:**

---

To ensure that ACL Steel Ltd. meets the requirements as set out in the Accessibility for Ontarians with Disability Act and the Ontario Human Rights codes.

---

**LEGISLATION:**

---

Accessibility for Ontarians with Disabilities Act, 2005  
Ontario Human Rights Code, 1990

---

**SCOPE:**

---

Vice President    President    Human Resources, Health and Safety Coordinator    Controller  
  
Supervisors    Foreman    All other employees    Visitors    Subcontractors (if applicable)

---

**DEFINITION:**

---

AODA            Accessibilities for Ontarians with Disabilities Act

AODA defines a DISABILITY as:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a development disability,
- c) a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.



Accessibility: means access – refers to the ability for everyone, regardless of disability or special needs, to access, use and benefit from everything within their environment. It is the “degree to which a product, device, service, or environment is available to as many people as possible.”

---

**POLICY:**

Discrimination against those with disabilities in Ontario continues to exist in spite of legislation. This Act was put in place to benefit everyone by ensuring that Ontario workplaces achieve accessibility with respect to goods, services, facilities, accommodation, employment, building, structures. This Act reflects the goal to improve accessibility across this province.

Goal of Accessibility: to create an inclusive society for people with physical, mobility, visual, auditory or cognitive disabilities. This means everyone has equal access to perceive, understand, engage, navigate and interact with all elements of the physical and digital world.

This Act pertains to employers who:

- Provide goods and services either directly to the public or to other businesses or organizations, and
- Have one or more employees in Ontario

To provide accessible customer service, organizations need to:

- Create and put in place an accessibility plan that:
  - Considers a person’s disability when communicating with them
  - Allows assistive devices - wheelchairs, walkers, oxygen tanks, etc.
  - Allows service animals
  - Welcomes support persons
  - Lets customers know when accessible services aren’t available
  - Invites customers to provide feedback
- Train staff on accessible customer service

Offering accessible customer service is not about the structure of your physical premises – not about changing doors or adding elevators or ramps. It’s simply about understanding that customers with disabilities may have different needs and helping them can be as easy as asking one simple question: How can I help?

**ACL’s Accessibility Plan** has the following elements:

- Considers a person’s disability when communicating with them
- Allows assistive devices such as wheelchairs, walkers and oxygen tanks
- Allows service animals
- Welcomes support persons
- Lets customers know when accessible services aren’t available
- Invites customers to provide feedback
- Trains staff and documents in training matrix



- Document in writing all policies, practices and procedures for providing accessible customer service and meet other document requirements set out in the standard.
- Provide the information in a format that takes into account the person's disability when requested
- Notifies customers that documents required under the customer service standard are available upon request.
- Complies with reporting requirements.

#### **INTEGRATED ACCESSIBILITY STANDARDS:**

ACL complies with the requirements set out in the IASR in the specified areas of customer service, employment, information communications, the built environment and transportation.

ACL Steel and continues to develop and maintain:

- Accessibility policies and plans
- Training for employees and volunteers
- Evaluation of accessibility when purchasing goods or services

#### **ACL Respects and upholds the guiding principals of the AODA:**

Dignity

Independence

Equal opportunity

Integration

### **ACL ACCESSIBILITY PROCESSES**

#### **Customer Service Processes:**

When providing goods and services, we consider the needs of people who are or have experienced a disability including:

- Physical disability
- Deaf or have some form of hearing loss
- Blind or have some form of loss of vision
- Deaf - blind
- Learning disability
- Speech or language impairment
- Intellectual or developmental disability
- Mental illness

We train and encourage all employees to follow some general guidelines when interacting with customers with disabilities including:

- Treat anyone with a disability with the same respect and courtesy that you would offer to everyone else
- Treat and speak to adults with disabilities as adults.
- Speak directly to the person with a disability not to the companion, assistant or interpreter who may be with them

- Don't shout; speak clearly and distinctly, and at a moderate pace.
- It's okay to use words like "see," "walk," or "hear." Don't avoid common expressions when they fit naturally into the conversation
- Offer assistance to a person with a disability if it seems appropriate, but wait until the offer is accepted before you help. If you are helping and aren't sure what to do, ask.
- Let a person with a disability make their own decisions regarding what they can or cannot do
- Do not make assumptions
- Do not pet, feed or distract a guide dog or service animal from doing its job.
- Ways of providing information for one person with a disability may not be appropriate for another
- Different people with the same type of disability may communicate in different ways because of different skills or resources.
- Where possible, it is helpful to ask the person directly how to communicate with them.

### **Communication:**

ACL uses a variety of means to make communication more accessible:

- Use plain language whenever possible.
- Offering a variety of methods of communication to clients and customers
  - In person
  - Via phone
  - Handout – use verbal to explain
  - Large print for those with low vision
  - Audio or digital format
  - Simplified summaries of information
- Allows and supports use of assistive devices or services.
- Assessing communication to take into account range of ways person with a disability can communicate (i.e.: person who is unable to speak may use gestures, pen/paper or typing).

### **Supports:**

Persons with disabilities are permitted to:

- Be accompanied by service animal, keeping the animal with them in areas open to public
- Animal must be kept in control at all times
- Be accompanied by a support person in order to assist with communication, mobility, personal care or medical needs, or access to goods or services
- Make use of assistive devices ensuring that the device is operated in safe, controlled way at all times



## **PROCEDURES:**

- The Customer Service Standards Policy Statement:
  - To be written and developed by Human Resources, Health and Safety Coordinator and Senior Management
  - To be posted by Senior Management
- Policy on providing training under the Customer Service Standards, including:
  - Human Resources, Health and Safety Coordinator to develop a summary of the contents of the training.
  - Human Resources, Health and Safety Coordinator to provide details of when the training was or is to be provided and to record of the number of individuals who have been trained.
  - Human Resources, Health and Safety Coordinator to provide safety talk to give information for Supervisors to deliver.
- Policies relating to allowing service animals and support persons on any part of the premises that are open to the public or to third parties.
- Steps to be taken in the event of a temporary disruption, including when and how notice will be provided.
- Feedback process, including:
  - To whom feedback should be addressed
  - How feedback will be responded to
  - How long the business will take to respond
- Sign must be posted in a conspicuous location informing the public that the documents required by the Customer Service Standards are available upon request

## **Feedback:**

We encourage feedback as it will only assist us to improve our Policies and Procedures. The process allows people to give feedback in a number of ways:

- In person, at reception
- By telephone
- In writing
- By email to [hr@aclsteel.ca](mailto:hr@aclsteel.ca)

## **Procedure:**

- The feedback can be received in any one of the forms listed above
- Human Resources, Health and Safety Coordinator will review and identify:
  - Does it involve a person?
  - An activity?
  - Is it positive or an opportunity to improve an existing Policy?
  - Is there an opportunity to provide further training?
- Human Resources, Health and Safety Coordinator will:
  - Decide upon the appropriate response
  - Will inform the JHSC in writing that feedback has been provided
  - HR will add as Agenda item for next scheduled Meeting with VP



- Maintain the confidentiality of the provider of feedback
- Will respond to the provider of feedback in an appropriate format

### **Notice of Temporary Disruption:**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. These include: in person services via reception including in person, via phone and by email. The notice will be made publicly available via posting on the website, message on our phone service and a posting at each public building entrance.

### **Confidentiality:**

If confidential information is to be disclosed, consent from person with disability must be obtained first  
Assistive Devices;

### **Emergency Planning:**

- Evacuation plans, signs – is there anything that would make it hard for a person with disability to read, see, hear, understand will be reviewed
- Human Resources, Health and Safety Coordinator will review the current Plans for Office and Shop for accessibility.
- Human Resources, Health and Safety Coordinator to make necessary changes to ERP
- Supervisors and Senior Management to provide changes to ERP via safety talk within 2 weeks of the ERP being completed by Human Resources, Health and Safety Coordinator
- Human Resources, Health and Safety Coordinator to amend the ERP within 2 weeks of performing an assessment regarding the accessibility of ERP information

## **ACCESSIBLE DESIGN**

### **Accessible Web Design:**

IT person to ensure that the company web site is designed with accessibility in mind.

### **Making Buildings Accessible:**

ACL will ensure that the requirements for the built environment as outlined in the IASR are met and in addition strive for physical, sensory, learning, developmental and mental health accessibility.

ACL's building has been assessed to determine the accessibility of:

- Entrances
- Exteriors
- Fire and life safety
- General layout and services



- Interiors
- Parking areas
- Public washrooms
- Signage and information systems
- Wall finishes

### **Accessible Employment Practices**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment. We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- information that is needed in order to perform the employee's job; and
- information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.



## TRAINING

### PROCEDURES:

- Training on the above information is provided to all new hires via a power point presentation based on information from Access Forwards' training modules and the Ontario Human Rights Commission's.
- Managers and those who are likely to have a higher level of interaction with customers and suppliers have received additional training on best practices for accommodating and working with persons with disabilities via completion of Access Forward's online customer service module.
- ACL Steel Ltd. administers an assessment of learning after the training course to ensure understanding and document course completion.
- ACL Steel Ltd. provides access to the book Demystifying Disability: What to Know, What to Say, and How to Be an Ally. This material will act as a supplement to the basic training and provide more in-depth information from someone with expertise and experience in accessibility. How to access this material will be discussed during onboarding and refresher AODA training courses.
- Records will be kept of all training and will be maintained by Human Resources, Health and Safety Coordinator

Training materials will be made available via alternative formats upon request.

---

### ROLES AND RESPONSIBILITIES:

---

#### Senior Management:

- Assign one person the responsibility to oversee the AODA Program
- Ensure Policy and Procedures implementation.
- Review and sign off on Policy Statement.
- Post Policy Statement
- Consider accessibility of products/ equipment purchased

#### Human Resources, Health and Safety Coordinator:

- Develop AODA Program with assistance of senior management.
- Provide access to documentation of policies, policy statements and procedures by posting copies in locations as outlined in this policy and via direct request.
- Will provide or arrange training.
- Will keep proof of training (records) on file.
- Review Policy Annually and oversight by ACL Steel Ltd.'s Vice President.

#### Supervisors:

- Uphold all AODA guiding principals and participate in all required training.
- Assist in ensuring accessibility of ACL's facilities and services for both employees and customers.



Workers:

- Workers will attend training sessions and respect and comply with the expectations outlined in this policy and the company's AODA Policy Statement.

---

**POLICY COMMUNICATION:**

---

This policy will be communicated in the following ways to ACL employees:

1. Training Presentations
  2. Safety Talks
  3. Availability on ACL Health and Safety Google Drive
  4. New Employee Orientation
- The Human Resources, Health and Safety Coordinator will provide policy and training within 5 working days to new employees.
  - The AODA policy statement will be posted in the lobby of the entrance and other locations as indicated above.

---

**EVALUATION:**

---

- Via Feedback
- By annual review of HR, Health and Safety Coordinator and ACL Vice President

---

**CONTINUOUS IMPROVEMENT:**

---

Improvements will be based on an annual review of the Policy and policy changes identified.