



Title: Accommodation Policy	Date of Issue: November 29/2023
Approved by: Vice President – Craig Seibel	Review / Revise Date:
Location: Office – Shop – Vehicles – Job Site	

PURPOSE:

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

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:

Accommodation:

The Ontario Human Rights Commission defines accommodation as: making adjustments to policies, rules, requirements and/or the built environment to ensure that people with *Code*-related needs have equal opportunities, access and benefits. (Ontario Human Rights Commission n.d.)

The AODA and the Human Rights Code share the following definition of disability:

- 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:

ACL Steel Ltd. is committed to accommodating persons with disabilities, ensuring a more equitable workplace.

The following process will be used to identify and meet employee accommodation needs:

1. Recognize the need for accommodation via:
 - a. Employee request
 - b. Management observation and/ or request
2. Gather Information and Assess Individual Need
 - a. Collect information on the employee's functional abilities. Medical or other experts may be contacted (at the company's expense) to determine the most appropriate accommodation.
 - b. Identify job duties affected by limitations.
 - c. Employee and Management or Human Resources will collaborate to find the most appropriate accommodation.

Employee's personal information will be kept secure and confidential as practicable. Information will only be disclosed to individuals who need it to participate in the accommodation process.

Employees may ask a workplace representative to participate in the process.

3. Develop Individual Accommodation Plan

Using the Individual Accommodation Plan Form the following will be documented:

- Limitations identified
- Job duties affected
- Accommodations provided
- Emergency Response Plan
- Additional supports available
- When the plan will be reviewed and updated

Human Resources will provide the employee a copy of the individual accommodation plan, or written statement outlining reasons for denying accommodation (accessible formats available upon request).

4. Implement/ Monitor/ Update

Human Resources, the employee and their manager will review the plan periodically and update the plan when required to ensure it is and remains effective. Additionally, the accommodation plan will be reviewed/ updated if/ when the employee's work location or position changes and/or the nature of the employee's disability changes.



ROLES AND RESPONSIBILITIES:

Senior Management:

- Review and sign off on Accommodation Policy and Procedure.
- Assign one person the responsibility to oversee the AODA Program.
- Support the provision of assistive devices and other means of accommodation.

Human Resources, Health and Safety Coordinator:

- Develop and implement accommodation policy, impairment and monitor for efficacy.
- Provide training on policy.
- Provide policy documents upon request.
- Will keep proof of training (records) on file
- Review Policy Annually and oversight by ACL Steel Ltd.'s Vice President
- Assist with the provision of assistive devices.
- Engage experts (ex. ergonomists) to generate accommodation options.

Supervisors:

- Cooperate in accommodation process and participate in all required training.

Workers:

- Attend training sessions.
- Participate in the development of their individualized accommodation plan when required.
- Provide information on functional abilities and any other required documentation/ information necessary to determine effective means of accommodation.

POLICY COMMUNICATION:

This policy will be communicated in one of the following ways to all 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 accommodation policy will be available upon request and will be uploaded to the company Health and Safety Google drive, which employees are able to access via QR code posted in shop and office lunchrooms.

TRAINING:

- 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 website within 5 working days of the employees' start.



EVALUATION:

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

CONTINUOUS IMPROVEMENT:

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