Accessibility Policy for Employment

1.0 Intent

This policy is intended to meet the requirements of the *Integrated Accessibility Standards Regulation (IASR), Ontario Regulation 191/11, Part III – Employment Standards* under the *Accessibility for Ontarians with Disabilities Act, 2005,* and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by Ultra Manufacturing Ltd. and its divisions, herein known as Ultra Manufacturing Ltd., shall follow the principles of dignity, independence, integration and equal opportunity.

2.0 Scope

a) This policy applies to employees of Ultra Manufacturing Ltd.;

b) This policy does not apply to volunteers or other non-paid individuals. *O. Reg. 191/11, s. 20 (1).*

3.0 Definitions

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

Accommodation – a special arrangement made, or assistance provided, so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation varies depending on the unique needs of each person.

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Career Development and Advancement – providing additional responsibilities within an employee's current position; and/or the movement of an employee from one job to another in the same organization that may be higher in pay, provide greater responsibility, or be at a higher level within the organization, or any combination of the aforementioned criteria.

Communication Supports – may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports which facilitate effective communications.

Disability – the term disability, as defined by the *Accessibility for Ontarians with Disabilities Act, 2005,* and the *Ontario Human Rights Code,* refers to*:*

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act,* to provide mobility, safety and increased independence for people who are blind.

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

Redeployment – the reassignment of employees 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.

Service Animal – as reflected in *Ontario Regulation 429/07*, an animal is a service animal for a person with a disability if:

- It is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in *Ontario Regulation 429/07*, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

4.0 General Principles

In accordance with the *Integrated Accessibility Standards Regulation (IASR), Ontario Regulation 191/11, Part III – Employment Standards,* this policy addresses the following:

A. Recruitment, Assessment and Selection
B. Informing Employees of Supports
C. Accessible Formats and Communication Supports for Employees
D. Workplace Emergency Response Information
E. Documented Individual Accommodation Plans
F. Return to Work Process
G. Performance Management, Career Development and Advancement, and Redeployment

A. Recruitment, Assessment and Selection

Ultra Manufacturing Ltd. will notify its employees and the public about the availability of accommodation for job applicants with disabilities in its recruitment process as follows:

- When posting an employment opportunity, job applicants will be notified of the availability of accommodation during the recruitment process;
- During the recruitment process, when job applicants are individually selected to participate in the assessment or selection process, applicants will be notified that accommodation is available upon request, in relation to the materials and processes used;
- If a selected job applicant requests accommodation during the assessment or selection process, the applicant will be consulted, and Ultra Manufacturing Ltd. will provide or arrange for the provision of a suitable accommodation that takes into account the applicant's accessibility needs;
- Notifying successful job applicants, when making job offers, of the policies for accommodating employees with disabilities.

B. Informing Employees of Supports

Ultra Manufacturing Ltd. will inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

- This information will be provided to new employees as soon as is practicable after they begin their employment;
- Updated information will be provided to employees whenever there is a change to existing policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

C. **Accessible Formats and Communication Supports for Employees**

Upon request of an employee with a disability, Ultra Manufacturing Ltd. will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

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

Ultra Manufacturing Ltd. will consult with the employee making the request in determining the suitability of an accessible format or communication support.

D. **Workplace Emergency Response Information**

Ultra Manufacturing Ltd. 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 Ultra Manufacturing Ltd. is aware of the need for accommodation due to the employee's disability;
- If an employee who receives individualized workplace emergency response information requires assistance, and with the employee's consent, Ultra Manufacturing Ltd. will provide the workplace emergency response information to the person designated by Ultra Manufacturing Ltd. to provide assistance to the employee.
- Information required under this section will be provided as soon as is practicable after Ultra Manufacturing Ltd. becomes aware of the need for accommodation due to the employee's disability.
- Individualized workplace emergency response information will be reviewed when the employee moves to a different location within the organization; when the employee's overall accommodation needs or plans are reviewed; and when Ultra Manufacturing Ltd. reviews its general emergency response policies.

E. **Documented Individual Accommodation Plans**

Ultra Manufacturing Ltd. will have in place a written process for the development of a Documented Individual Accommodation Plan (IAP) for employees with a disability. This process will include:

- The employee's participation in the development of the IAP;
- The means by which the employee is assessed on an individual basis;

- Identification of the accommodation(s) to be provided;
- Timelines for the provision of accommodations;
- Ultra Manufacturing may request an evaluation by outside medical or another professional, at the company's expense, to assist with determining accommodation needs, and how best to achieve accommodation;
- Employees may request the participation of a representative from the workplace, or a representative from their bargaining agent when applicable, in the development of the accommodation plan;
- The means by which the privacy of the employee's personal information will be protected;
- The frequency with which the IAP will be updated, and the manner in which this will be done;
- If an IAP is denied, the reasons for the denial will be provided to the employee;
- A format for the plan which takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided; and
- Identification of any other accommodation that is to be provided.

F. **Return to Work Process**

Ultra Manufacturing Ltd. will have in place a return to work process for employees who have been absent from work due to a disability, and who require disability-related accommodation(s) in order to return to work. This process will be documented, and will outline the steps that Ultra Manufacturing Ltd. will take to facilitate the return to work of the employee. The process will also integrate Documented Individual Accommodation Plans, as outlined in Section E above: either by following or modifying pre-existing plans if applicable, or by working with the employee to create a new plan.

G. **Performance Management, Career Development and Advancement, and Redeployment**

Ultra Manufacturing Ltd. will take into account the accessibility needs, and/or the Individual Accommodation Plans, of employees with disabilities when:

- Using performance management processes;
- Providing career development and advancement information; and
- Using redeployment procedures.

5.0 Notice of Availability and Format of Documents

Ultra Manufacturing Ltd. shall notify customers that the documents related to the *Accessibility Standard for Employment* are available upon request and in a format that takes into account the customer's disability.

6.0 Feedback Process

Ultra Manufacturing Ltd. shall provide employees and customers, including job applicants, with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, or email), will be available upon request.

Submitting Feedback:
Individuals who wish to provide feedback by completing an onsite customer feedback form, or verbally, can do so by contacting Human Resources at Ultra Manufacturing Ltd.

Individuals who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

7.0 Compliance and Enforcement

Ultra Manufacturing Ltd. shall file an Accessibility Report with the Ministry of Economic Development, Employment and Infrastructure upon request to satisfy requirements set out by the *Accessibility for Ontarians with Disabilities Act, 2005.*

8.0 Training Schedule

Ultra Manufacturing Ltd. will provide training upon hire of all employees within a role of providing goods and services. Training will be provided to all employees providing goods and services annually. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Ultra Manufacturing Ltd. will keep a record of training within the employee's training file.

9.0 Continuous Improvement

This policy and its related procedures will be reviewed as required in the event of legislative changes.

10.0 Administration

If you have any questions or concerns about this policy or its related procedures please contact:

Contact: Human Resources

Phone Number: (519) 893-3831

Mailing Address: Ultra Manufacturing Ltd.
100 Washburn Drive
Kitchener, Ontario
N2R 1S2

Email Address: reception@ultramanufacturing.com

11.0 Reference

WI-18.1-C – AODA Documented Individual Accommodation Plans
Safety PRO-10 – RTW Program Development
POL-17 – AODA Accessibility Policy for Customer Service

12.0 Revision Record

Rev	*Pages*	*Description*	*Revised By*	*Date*
Rel	*All*	*New Policy*	*Maggie Kratz*	*May.2016*
001	*All*	*Reviewed; updates to font and formatting throughout*	*Maggie Kratz*	*Feb 2020*
002	*7*	*Section 11.0 Reference – updated titles of reference documents to reflect change to standardized naming format for all AODA documents*	*Maggie Kratz*	*April 2020*
003	*All*	*Compliance Review of policy and reference documents*	*Melanie Toth*	*November 6, 2023*