

	
<b>Title: Shipway Stairs Ltd. Integrated Accessibility Standards Multi Year Plan</b>	
Issue Date: January 1, 2019	Previous Issue Date: January 1, 2018
Originator: Human Resources	Approved: President and Vice President

## Shipway Stair Ltd. Multi-year Accessibility Plan

### INTRODUCTION AND STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (the “AODA”). It is the goal of the Ontario government to make Ontario accessible by 2025. The Integrated Accessibility Standards Regulations (“IASR”) under the AODA require that Shipway Stairs Ltd. establish, implement, maintain and document a multi-year accessibility plan which outlines the organization’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

Under the AODA, the following accessibility standards set certain requirements that are applicable to Shipway Stairs Ltd.:

- Customer Service
- Emergency Procedure, Plans Or Public Safety Information
- Workplace Emergency Response Information
- Procuring Or Acquiring Goods, Services Or Facilities
- Training
- Information and Communications
- Employment
- Accessibility Standards for the Built Environment

This multi-year plan outlines Shipway’s strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill Shipway’s commitment, as outlined in Shipway’s AODA Policy.

In accordance with the requirements set out in the IASR, Shipway will:

- Establish, review and update this plan in consultation with persons with disabilities.
- Post this plan on its website.
- Provide this plan in an accessible format, upon request.
- Review and update this plan at least once every five years.

## CUSTOMER SERVICE STANDARDS

### **Commitment:**

Shipway Stairs Ltd. is committed to excellence in serving all customers, including persons with disabilities and it will carry out its functions in a manner which delivers an accessible customer service experience.

Shipway Stairs Ltd. is committed to providing its goods and services in a way that respects the dignity and independence of persons with disabilities. This commitment will be integrated wherever possible and will ensure that persons with disabilities will benefit from the same services, in the same place and in a similar way as other Shipway Stairs Ltd. customers.

### **Action Taken:**

The following measures have been implemented by Shipway Stairs Ltd.:

- Ensuring all persons who, on behalf of the Shipway Stairs Ltd., deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities.
- Ensuring such persons are trained and familiar with various assistive devices that may be used by customers with disabilities.
- Ensuring completion of accessibility training is tracked and recorded.
- Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated.
- Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication channels.
- An “Accessibility” tab has been added to the footer of the websites, to communicate the Shipway Stairs Ltd.’s accessible customer service policy including related procedures and guidelines.

**Required legislative compliance: January 1, 2012**

**Completion date: January 1, 2012**

## EMERGENCY PROCEDURE, PLANS OR PUBLIC SAFETY INFORMATION

### **Commitment:**

Shipway Stairs Ltd. is committed to providing and maintaining premises that respect the dignity and independence of persons with disabilities.

### **Action Taken:**

The following measures were implemented by the Shipway Stairs Ltd.:

- Emergency procedures, plans and public safety information that are prepared by Shipway Stairs Ltd., and will be made available in an accessible format or with appropriate communication supports, upon request.
- An accessible format employee information sheet was developed and is available for completion by Shipway Stairs Ltd. staff upon request in an accessible format, however requested or reasonable by the staff member. In addition, an internal referral process is in place for fulfilling the accessible format request.

**Required legislative compliance: January 1, 2012**

**Completion date: January 1, 2012**

## WORKPLACE EMERGENCY RESPONSE INFORMATION

### **Commitment:**

Where Shipway Stairs Ltd. is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### **Action Taken:**

The following measures were implemented by Shipway Stairs Ltd.:

- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required.
- Workplace emergency response information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities.
- Where required, Shipway Stairs Ltd. provides assistance to specific disabled employees, with the disabled employees' prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees.
- These individualized emergency plans will be communicated to the employees' respective managers and safety personnel, on an 'as needed' basis.
- On an ongoing and regular basis, and as per the applicable terms of the IASR, Shipway Stairs Ltd. will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

**Required legislative compliance: January 1, 2012**

**Completion date: January 1, 2012**

PROCURING OR ACQUIRING GOODS, SERVICES OR FACILITIES

**Commitment:**

Shipway Stairs Ltd. is committed to incorporating accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.

**Action Taken:**

The following measures have been implemented by Shipway Stairs Ltd.:

- Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.
- Where Shipway Stairs Ltd. has decided that it is not practicable to incorporate accessibility criteria and features, it will provide an explanation upon request.
- Provide educational awareness and tools to internal stakeholders and communication to external stakeholders, informing on changes to procurement procedures and purchasing criteria.

**Required legislative compliance: January 1, 2013**

**Completion date: January 1, 2013**

TRAINING

**Commitment:**

Shipway Stairs Ltd. is committed to implementing a process to ensure that all employees, volunteers, third-party contractors who provide goods, services and facilities on Shipway Stairs Ltd.'s behalf, and persons participating in the development and approval of Shipway Stairs Ltd.'s policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

**Action Taken:**

The following measures have been implemented by Shipway Stairs Ltd.;

- Establish an internal committee with the responsibility for developing appropriate training.
- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on Shipway Stairs Ltd.'s behalf, and persons participating in the development and approval of Shipway Stairs Ltd.'s policies.
- Ensure that the training is provided to persons referenced above as soon as practicable.
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

## INFORMATION AND COMMUNICATION STANDARDS

### **Commitment:**

Shipway Stairs Ltd. is committed to making company information and communications accessible to persons with disabilities. Shipway Stairs Ltd. will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities.

### **1. Feedback, Accessible Formats and Communication Supports**

**Action Taken:** The following measures were implemented by Shipway Stairs Ltd.;

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner.
  - Provide or arrange for the provision of such accessible formats and communication supports.
  - Consult with the person making the request to determine the suitability of the accessible format or communication support.
  - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
  - Notify the public about the availability of accessible formats and communication supports.

**Required legislative compliance: January 1, 2015**

**Completion date: January 1, 2015**

### **2. Accessible Websites and Web Content**

**Action Taken:** The following measures were implemented by Shipway Stairs Ltd.;

- AODA compliance is included as one of the criteria in selecting technology vendors for new website development initiatives.
- Follow the mandated Accessibility Directorate of Ontario (ADO) guidelines and Province of Ontario I&IT solutions that support obligated Private Sector and Broader Public Sector organizations in compliance initiatives

**Required Legislative Compliance: January 1, 2021**  
**Anticipated Completion date: January 1, 2021**

## EMPLOYMENT STANDARDS

### **1. Recruitment**

#### **Commitment:**

Shipway Stairs Ltd. is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

#### **Action Taken:**

The following measures were implemented by Shipway Stairs Ltd.:

#### **Recruitment General**

Shipway Stairs Ltd. will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes.
- Specifying that accommodation is available for applicants with disabilities on job postings.

#### **Recruitment, Assessment and Selection**

Shipway Stairs Ltd. will notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes.
- If a selected applicant requests an accommodation, consult with the applicant and arrange for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.

#### **Notice to Successful Applicants**

When making offers of employment, Shipway Stairs Ltd. will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- A review and, as necessary, modification of existing recruitment policies, procedures and processes.

- Inclusion of notification of Shipway Stairs Ltd.'s policies on accommodating employees with disabilities in employment offers.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

## **2. Informing Employees of Supports**

In accordance with the IASR, Shipway Stairs Ltd. will inform all employees of policies that support 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.

### **Action Taken:**

The following measures were implemented by Shipway Stairs Ltd.:

- Informing current employees and new hires of Shipway Stairs Ltd.'s policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability.
- Providing information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process.
- Keeping employees up to date on changes to existing policies on job accommodations with respect to disability.
- Where an employee with a disability so requests it, Shipway Stairs Ltd. will provide or arrange for provision of suitable accessible formats and communications 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.

In meeting the obligations to provide the information that is set out in the paragraph above, Shipway Stairs Ltd. will consult with the requesting employee in determining the suitability of an accessible format or communication support.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

## **3. Documented Individual Accommodation Plans/Return to Work Process**

### **Commitment:**

Shipway Stairs Ltd. will incorporate new accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

### **Action Taken:**

The following measures have been implemented by Shipway Stairs Ltd.;



Shipway Stairs Ltd.'s existing policies include steps that Shipway Stairs Ltd. will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to disability.

Shipway Stairs Ltd. will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability, if such plans are required.

Shipway Stairs Ltd. will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan.
- Include in the process the means by which the employee is assessed on an individual basis.
- Include in the process the manner in which Shipway Stairs Ltd. can request an evaluation by an outside medical or other expert, at Shipway Stairs Ltd.'s expense, to assist Shipway Stairs Ltd. in determining if and how accommodation can be achieved.
- Steps are in place to protect the privacy of the employee's personal information.
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done.
- Provide the employee with the reasons for the denial if an individual accommodation plan is denied.
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.
- If individual accommodation plans are established, ensure that they include.
  - Information that is needed in order to perform the employee's job.
  - Information that is generally available to employees in the workplace.
- Identify any other accommodation that is to be provided to the employee.

Shipway Stairs Ltd. will ensure that the return to work process as set out in its existing policies outlines the steps Shipway Stairs Ltd. will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

**Required Legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**



## 4. Performance Management, Career Development and Redeployment

### Commitment:

Shipway Stairs Ltd. will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans:

- When using its performance management process in respect of employees with disabilities.
- When providing career development and advancement to its employees with disabilities.
- When redeploying employees with disabilities.

### Action Taken:

The following measures have been implemented by Shipway Stairs Ltd.:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR.
- Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
  - Assessing performance
  - Managing career development and advancement
  - Redeployment is required
- Review, assess and, as necessary, include in Performance Management workshops, accessibility criteria.
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings.

**Required legislative compliance: January 1, 2014**

**Completion date: January 1, 2014**

## DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY FOR THE BUILT ENVIRONMENTS)

### **Commitment:**

Shipway Stairs Ltd. is committed to designing public spaces that are free from barriers and accessible to all persons we serve while undertaking new construction or planned significant alterations.

### **Action Taken:**

In accordance with the IASR, Shipway Stairs Ltd. implemented the following:

- Shipway Stairs Ltd. shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction or planned significant alterations of public spaces.

**Required legislative compliance: January 1, 2017**

**Completion date: January 1, 2017**