



## **AODA Policy**

**Issued by: Peter Cuypers**

**Issued date: January 3, 2017**

# Statement of Commitment

Partners In Credit Inc. is an equal opportunity employer and our policies are compliant with the Accessibility for Ontarians with Disabilities Act, 2005 and its associated standards and regulations.

Partners In Credit Inc. is committed to providing a barrier free environment for all employees/ clients/customers, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services.

We understand our responsibility to ensuring a safe, dignified, and a welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier free environment is a shared effort and as an organization, Partners In Credit Inc. is committed to working with the necessary parties to make accessibility for all a reality.

For more detailed information on our accessibility policies, plans, and training programs, please ask for a copy of our AODA Policy or contact our Human Resources department or a Joint Health and Safety member.

HR- Melanie Moore Ext. 3469

JHSC - Peter Cuypers Ext. 3471

# **A. DEFINITIONS AND EXPLANATIONS**

## **1. Disability**

"Disability" or "handicap" refers to all disabilities protected in the Human Rights Code, R.S.O. 1990, Ch.H.19 and is defined in sec.10 of the Code as:

*(a) 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, including diabetes mellitus, epilepsy, and 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 on a wheelchair or other remedial appliance or device,*

*(b) A condition of mental disorder, handicap or impairment,*

*(c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,*

*(d) An injury or disability for which benefits were claimed or received under the Workplace Safety and Insurance Act.*

## **2. Accommodation**

Accommodation is an adaptation or adjustment for the benefit of the disabled. It applies to recruiting, selection and employment including training and career development. It may be short or long-term with the goal of enabling the person with disabilities to perform the essential duties of the position.

**Examples of accommodation include but are not limited to:**

### **(i) Communications Services**

"Communications services" includes captioning, conversion of print to braille, audiotapes or enlarged print.

### **(ii) Human Support Services**

"Human Support Services" refers to personnel provided to assist in accommodation; examples include attendants, sign language and oral interpreters, readers and service animals.

### **(iii) Technical Aids and Devices**

"Technical aids and devices" includes, environmental control units (for example, remote control to open/close doors, operate lights), hoists, grips, Telephone Devices for the Deaf, infrared systems, FM broadcast systems, braille computer printers, optical character recognition systems,

keyboard adaptations and the training and technical support required to use technical aids and devices.

#### **(iv) Position Redesign**

"Position redesign" refers to the modification of duties and/or the hours of work on either a short or long-term basis.

#### **(v) Employment Policy and Practice Modifications**

"Employment policy and practice modifications" refers to the practice of waiving or modifying a particular working condition to provide accommodation, e.g., by providing flexible hours.

#### **(vi) Workplace Modifications**

"Workplace modifications" refers to physical or technological alterations of the workplace, and includes specialized or adjustable furniture, modified lighting, handrails, door access and retrofitted facilities.

### **3. Work Hardening**

Work hardening refers to a program delivered by an external service provider with a view to increasing the employee's tolerance for returning to the workplace.

### **4. Ergonomics**

Ergonomics includes task and/or equipment modification to enable the worker to accomplish the essential duties of his/her position.

### **5. Essential Duties**

The essential duties of a position are those duties necessary to achieve the overall objective of the position.

To determine the essential duties of a position, consideration is given to:

- (i) How often each duty is undertaken
- (ii) Proportion of time spent on each duty
- (iii) Impact of removing a duty
- (iv) Description of current position, and
- (v) Normal productivity expected in the position

## B. GENERAL GUIDELINES FOR ACCOMMODATION PLANS

Partners In Credits will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

1. Accommodation shall address current employment limitations only, unless future limitations are known and can reasonably be accommodated coincident with the present accommodation.
2. Accommodation shall address such needs as are disclosed by the employee and which directly relate to their employment or such needs as are disclosed by the position applicant and which directly relate to the application process.
3. The employee shall participate in all stages of the accommodation process together with the appropriate department and the Joint Health and Safety Committee (JHSC).

Other participants in the process may include as appropriate: Human Resources/Employee Relations (HR/ER), unions/employee associations, health care professionals and insurers.

4. The employer may seek assistance from outside experts for preparation requirements.
5. The employer will take all necessary steps to protect the privacy of the employee and his/ her personal information.
6. A review schedule will be created as mutually agreed upon by both the employee and employer.
7. The employer shall attempt to re-employ a worker who has been unable to work as a result of illness or injury in a manner consistent with the Workplace Safety and Insurance Act, and/or the Companies policies and practices.
8. The employee and employer will structure an accommodation plan that meets the needs of both parties.
9. The nature of the accommodation provided may include the following types of accommodation, as appropriate:

- (i) Communications services
- (ii) Human support services
- (iii) Technical aids and assistive devices
- (iv) Position redesign
- (v) Employment policy and practice modifications
- (vi) Workstation modifications

## **C. HIRING PROCESS AND JOB APPLICANTS WITH DISABILITIES**

Partners in Credit is committed to ensuring that our recruitment and assessment processes are fair and accessible. All supervisors and other employees involved in staffing of any type are required to complete the AODA Employment Standard training module.

1. Partners in Credit will publically post that employer will accommodate people with disabilities.

(i) On Company Website

(ii) Job postings

(iii) General information board

2. Applicants will be made aware that accommodations are available and that they may request accommodation at any time during the hiring process. PIC is committed to understanding their needs and will make changes as required.

3. Accommodation for applicants shall be coordinated through the HR Department and or JHSC whereby where there is a need for accommodation, PIC will provide individualized workplace emergency response information upon request.

## **D. SHORT-TERM ACCOMMODATION OF EMPLOYEES**

If injury or illness is likely to prevent an employee from fulfilling the essential duties of his/her position in case of temporary disruptions, the Company shall endeavour to provide accommodation to the employee. The objective of the short-term accommodation is the graduated return of an employee to full duties. A short-term accommodation typically includes modified hours and/or duties for a limited period of time and may include ergonomic interventions.

1. All requests for short-term accommodation shall be directed to the HR.
2. HR and JHSC shall meet with the employee to explain the work accommodation process and to obtain relevant medical information. HR shall then prepare an appropriate accommodation plan for the approval of the employee's unit/department.
3. Where the employee is not able to perform the essential duties of the pre-injury/pre-illness position, the employee may require any of the following:
  - (i) An extension of the accommodation period
  - (ii) A new accommodation plan
  - (iii) Work hardening
  - (iv) A return to leave for further medical gains
  - (v) An assessment for a long-term accommodation

## **E. LONG-TERM ACCOMMODATION OF EMPLOYEES**

The Company shall endeavour to provide long-term accommodation to enable an employee with an injury, illness or disability to fulfill the essential duties of the position. Long-term accommodation typically modifies the worksite, tools, duties and/or hours.

1. All requests for long-term accommodation shall be directed to HR.
2. HR shall meet with the employee to explain the process and obtain relevant information such as medical information and releases.
3. HR shall contact the unit/department to obtain information about the position, and to determine if an independent medical assessment is required at this stage. If the employee's own position is not available, the employee will be referred to HR/ER.
4. HR shall provide the employee's unit/department with an assessment so that the unit/department can determine if long-term accommodation is possible.
5. If the specific approved long-term accommodation cannot be provided immediately, consideration will be given to interim methods of providing accommodation.
6. If the employee's own position is available, but the initial decision is that an accommodation cannot be made by the unit/department,
  - (i) HR shall notify the employee, the union, HR, and
  - (ii) HR shall arrange for an independent medical assessment.
7. The independent medical assessment shall allow the Company to determine whether,
  - (i) The employee can perform the essential duties of the position with an accommodation if necessary; or
  - (ii) The employee should receive further intervention such as work hardening before an accommodation can be provided, or
  - (iii) The employee's limitations cannot be accommodated in his/her own position, and the employee should be referred to HR..
8. The Company shall continue to use its best efforts to place the employee in an alternative position for which the employee is qualified in accordance with the Workplace Safety and Insurance Act, Company policies, practices and collective agreements. The employee must be qualified and able to fulfill the essential duties of the alternative position, with accommodation if necessary.



## **F. FEEDBACK**

The company shall make available to the employee opportunity to provide feedback on the goods and services being provided. Email address and extension number of HR representative will be provided to allow the employee to voice any concerns or requests. Additionally, with each review, the employee will also be provided an opportunity to voice any concerns and or requests. These will be documented, addressed maintained in personnel files.

## **G. TRAINING**

Partners in Credit will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties and needs of employees, volunteers and other staff members and every person who deals with the public on behalf of Partners in Credit including third parties i.e. employees, agents, volunteers, management. In addition, employees may also have to be trained on one or more of the standards-information and communications, employment or transportation, as it relates to the duties and responsibilities of their position.

Partners in Credit has taken the following steps to ensure employees were provided with the training needed to meet Ontario's accessible laws by January 1, 2017

- Developed a process that determines and ensures the correct training is delivered on the requirements of the Ontario Human Rights Code.
- Provided educational or training resources or materials in an accessible format that takes into account the accessibility needs of a person with a disability.
- Ensured new employees and volunteers all complete training within two (2) weeks of employment.
- Maintains a database of the training participant's names and dates of completion.

## **H. SUMMARY OF OPERATIONAL RESPONSIBILITIES**

Operational responsibilities for implementation of the Accommodation in Employment for Persons with Disabilities Policy are shared by all executives of the Company. Some areas however, are specifically accountable for implementation of segments of this Policy and procedure.

### **President**

The President is responsible for;

- (i) The approval of the Accommodation in Employment for Persons with Disabilities Policy.
- (ii) Financing the accommodation costs according to specific criteria

### **Vice-President, Operations**

The Vice-President (Operations) is responsible for:

- (i) Approving the guidelines and procedures for Accommodation in Employment of Persons with disabilities, which may be revised from time to time;

### **Director, Audit Risk and Compliance**

The Department of compliance is responsible for:

- (i) Ensuring that recruiting and hiring are conducted in accordance with Company policies, procedures and collective agreements
- (ii) Advising applicants and employees of relevant company policies, procedures and collective agreements and the mechanisms available to them for pursuing solutions
- (iii) Providing disability management services directly or in conjunction with the Joint Health and Safety Committee
- (iv) Providing assessment and training where required
- (v) Facilitating position placements where appropriate
- (vi) Advising on contractual requirements concerning employee accommodations

### **Joint Health and Safety Committee and Human Resources Department**

The Joint Health and Safety Committee and Human Resources Department is responsible for:

- (i) Coordinating accommodations of position applicants and employees as appropriate;
- (ii) Communicating companies accessibility policy by way of Newsletter, emails, memo, bulletin boards, staff meetings and / or one-on-one conversations.
- (iii) Assessing in conjunction with the academic administrator, local manager and/or supervisor and the employee the position requirements, and the employee's functional abilities for accommodation requirements;

- (iv) Developing an appropriate accommodation plan for applicants and employees with disabilities according to the guidelines and procedures of this Policy;
- (v) Monitoring and evaluating accommodations;
- (vi) Complete the required compliance report on a timely basis.

### **Academic Administrators, Local Managers and Supervisors**

Academic Administrators, Local Managers and Supervisors are responsible for:

- (i) Ensuring that recruitment and hiring are conducted in accordance with Company policies, procedures and collective agreements;
- (ii) Promoting an environment supportive of requests for accommodation;
- (iii) Working with DOHS in the development of appropriate accommodation for applicants and employees in accordance with the guidelines and procedures of the Accommodation in Employment for Persons with Disabilities Policy;
- (iv) Implementing and overseeing accommodations and facilitating the integration of the employee being accommodated such as but not limited to large print for visually impaired.
- (v) Protect the privacy and confidentiality of the employees personal information / situation
- (vi) Hold formal and informal performance reviews and review the employee on an individual basis

### **Employees**

Employees are responsible for:

- (i) Disclosing the particulars of their need for accommodation
- (ii) Participating in the accommodation process e.g., by providing relevant medical information in a timely manner, identifying the essential duties that they are able or unable to perform

**Standard and accessible formats of this document are available free upon request.**

**Authorized Creator:** Peter Cuypers, National Director, JHSC Manger

**Signature:**  \_\_\_\_\_