



## **Human Resources Policies and Procedures**

Policy: Accessibility for Ontarians with Disabilities Act (AODA)	Policy: #
Date Issued: February 18, 2015	Date Revised:
Approved by: Darcy Charron	Page: 1 of 6

### ***Purpose***

***The accessibility for Ontarians with disabilities act, 2005 (AODA) was created with the goal of developing standards that would improve accessibility for people with disabilities across the province. The AODA complements the requirements under the Human Rights Code and other laws that protect disabled persons from discrimination or harassment. Ontario Regulation 429/07 establishes accessibility standards for customer service and it applies to every designated public sector organization and to every other person or organization that provides goods or services to members of the public or other third parties and that has at least one employee in Ontario.***

### **SCOPE**

This policy applies to all employees, volunteers, agents and/or others who deal with the public or other third parties on behalf of Kromet International Limited in Ontario.

#### Definitions

AODA “employee” definition does not apply in respect of volunteers and other non-paid individuals except where specifically notes.

AODA “customer” definition includes everyone who interacts with our organization, such as customers, suppliers, vendors, consultants and any other third party.

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

Conversion Ready means an electronic or digital format that facilitates conversation into an accessible format.

Disability, as defined by the AODA, includes but is not limited to:

- 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, includes diabetes, mellitus, epilepsy, a brain injury, any degree of paralysis, amputations, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impairment, muteness or

- speech impediment, or physical reliance on a guide dog or animal or on a wheelchair or other remedial appliance or device;
- b. A condition of mental impairment or a developmental 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.

Service animals: any animal that is individually trained to do work or perform tasks for the benefit of an individual with a disability, including physical, sensory, psychiatric, intellectual, or other mental disability.

If it is not readily apparent that the animal is being used for reasons relating to a persons disability, Kromet International Inc may request verification. Verification may include:

- A letter from a physician or nurse confirming that the person requires the animal for reasons related to a disability;
- A certificate of training from a recognized guide dog or service animal training school.

Support person: Any person who accompanies a disabled person in order to help with communication, mobility, personal care, medical needs and/or access to goods, services or facilities.

Personal assistive devices: any device that is used, designed, made or adapted to assist persons with disabilities in performing various, everyday tasks such as moving, communicating, reading, writing or lifting.

Personal assistive devices cover a broad range of products, including but not limited to: wheelchairs, power chairs, walkers, white canes, assistive listening devices, and oxygen tanks.

## **REFERENCES**

AODA	Accessibility for Ontarians with Disabilities Act (2005)
OHRC	Ontario Human Rights Code (1990)
OHSA	Occupational Health and Safety Act (2012)

## **RESPONSIBILITY**

### Human Resources Department

Must ensure that all current and prospective employees are aware of and understand their rights as they relate to AODA and the OHRC.

Provide training to all employees regarding their own responsibilities as they pertain to accommodation.

## Managers

All managers must attend training as necessary to ensure knowledge of accommodation procedure.

Must ensure prospective and current employees are treated equitably when requesting accommodation.

## Employees

Must attend training to ensure knowledge of all accommodation procedures and their rights under the AODA.

## **PROCEDURES**

Kromet International is committed to accommodating in a way that respects the dignity and independence of persons with disabilities. We are also committed to giving persons with disabilities the same opportunity to access our services and facilities at their own pace, and allowing them to benefit from the same opportunities, in the same place and in a similar way as other Kromet employees and customers. We will also take into account individual needs when providing services and access to our facilities and communicate in a manner that takes into account the persons disability.

Kromet International will make every reasonable effort to ensure that our policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity.

## **CUSTOMER SERVICE**

Kromet International is committed to excellence in serving all customers including persons with disabilities and we will carry out our functions and responsibilities in the following areas:

### **Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing goods, services or facilities of Kromet International.

### **Billing**

Kromet International is committed to providing accessible notices and invoices to all our customers. For this reason, notices and invoices will be provided in alternative formats upon request.

### **Service Animals**

Persons with disabilities may enter Kromet International premises accompanied by a service animal and keep the animal with them, if the public has access to such premises, and the animal is not otherwise excluded by law. Alternative arrangements would be explored in situations where a service animal is not permitted (i.e. Kromet International anodizing line).

While visiting Kromet International, it is the responsibility of the person with a service animal to control the animal at all times.

If a health and safety concern presents itself for example in the form of an allergy to the animal, Kromet International will make all reasonable efforts to meet the needs of all individuals.

### **Support person**

Persons with disabilities may enter Kromet International premises accompanied by a support person and have access to that support person at all times.

Kromet International may require a person with a disability to be accompanied by a support person while on premises, in situations where it is necessary to protect the health and safety of the person with a disability, or the health and safety of others on company premises.

Consent from the person with a disability may be required when communicating private issues related to the person with a disability, in the presence of a support person.

A support person will need to meet the requirements under the controlled goods program.

### **NOTICE OF TEMPORARY DISRUPTION**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Kromet International. Kromet International will make reasonable effort to provide employees and other persons who may be conducting business on Kromet International property with notice in the event of a disruption in the facilities or services usually used by people with disabilities.

This notice will include information about the effect of the disruption, the reason for the disruption, its anticipated duration, and the description of alternative facilities or services, if available. We will not be able to give adequate notice in case of an emergency temporary disruption however when needed, individual accommodation plans will be in place to ensure employees or prospective employees with disabilities will have sage procedures to follow.

### **ACCESSIBLE RECRUITMENT PRACTICES**

Kromet International is committed to a recruitment process that is both accessible and fair for all prospective and current employees. We will ensure that all employees, applicants and members of the public are aware of Kromet Internationals commitment to accommodate through the following disclaimer which is to be used on all internal and external job advertisements.

Kromet International Ltd is an equal opportunity employer and will provide accommodations for disabilities upon request. Kromet International has approval under the federal contractors program and encourages applications from all designated groups.

To ensure that all successful applicants are aware of their rights to ask for accommodation the following clause is to be added to all conditional offer letters.

Kromet International Ltd is committed to ensuring its workplace is safe and accessible for all its employees. Kromet International has a policy in place to accommodate employees with disabilities. If you are in need of an accommodation for a disability, please advise your HR contact as soon as possible so that we can make arrangements to accommodate your disability prior to your first day of employment.

## **EMPLOYEE SERVICES**

### **Assistive Devices**

Employees with disabilities may use their own assistive devices as required while engaged in business with Kromet International, except in the case where doing so would create a hazard to themselves or to their fellow employees.

### **Workplace Information**

Kromet International is committed to providing all policies and procedures relevant to an employee's position in an accessible format. If needed, alternative formats or communication supports are to be provided upon request and after consultation with an employee. Whenever possible, information should be created in a "conversion ready" format so that it is possible for the employee to access the material using their prescribed assistive devices.

### **Individual Accommodation Plan,**

Please refer to EHS procedure: Emergency Preparedness and Response Plan.

### **Return to Work**

Please refer to the following EHS procedures: Short Term Disability and Early and Safe Return to Work Claims Management.

## **TRAINING**

Training will be provided to:

- a. All employees, agents and/or others who deal with the public or third parties on behalf of Kromet International in Ontario; and
- b. Those who are involved in the development and approval of customer service policies, practices and procedures applicable in Ontario.

The training will cover the following topics:

- A review of the requirements of the Accessibility Standards for Customer Service Ontario Regulation 429/07,
- A review of the requirements of the integrated Accessibility Standards, Ontario Regulation 191/11,
- Instructions on how to interact and communicate with people with various types of disabilities
- Instructions on how to interact with people with disabilities who:
  - Use assistive devices
  - Required the assistance of a guide dog or other service animal;  
or
  - Require the use of a support person
  - Instructions on what to do if a person with a disability is having difficulty accessing services.

## **MULTI-YEAR ACCESSIBILITY PLAN**

The multi-year accessibility plan outlines Kromet International's strategy to prevent and remove barriers and to meet the requirements under the Integrated Accessibility Standards, Ontario Regulation 191/11.

Our multi-year accessibility plan will be posted on our website, and available in an accessible format upon request. The multi-year accessibility plan will be reviewed and updated at least once every five years.

The plan will ensure that Kromet International is appropriately:

- Meeting our accessibility requirements within required timelines specified in the Regulation
- Addressing any current accessibility barriers
- Preventing and removing future barriers

The plan will address accessibility strategies in the following areas:

- General Accessibility
- Information and Communication
- Employment
- Built Environment- Design of Public Spaces.

## **FEEDBACK PROCESS**

The ultimate goal of Kromet International is to meet and surpass current and prospective employee's expectations when accommodating disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Customers can submit feedback by:

- Verbally providing feedback to any Kromet International employee; or
- Sending feedback to:

HR Associate  
Kromet International Ltd. 200 Sheldon Drive  
Cambridge, Ontario, N1R7K1