



Accessibility

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Approved

The ***Accessibility for Ontarians with Disabilities Act, 2005*** (AODA) was created to develop mandatory accessibility standards that identify, and to the extent possible, prevent and eliminate barriers experienced by persons with a disability, both visible and non-visible. A disability may have been present from birth, caused by an accident, or developed. There are physical, mental and learning disabilities, mental health issues, hearing or vision disabilities, drug and alcohol dependencies, environmental sensitivities, and other conditions.

PSI is committed to providing a high level of customer service to its customer, staff and visitors including those with a disability. PSI is also committed to providing reasonable accommodation to its visitors with disabilities and is dedicated to continuously improving and evolving its practices in this regard. Floor Plans denote where wheelchair accessible washrooms are located, fire extinguishers, as well as where exits are located. Floor Plans must be posted at all service locations, and visible to all.

A standard for customer service has been established under the Act to ensure goods and services are, where at all possible, equally accessible to every member of the public.

We at PSI are committed to providing a barrier-free environment and the objective of this policy is to ensure we meet the requirements of the Standard and promote its underlying core principles as described below.

Disability is defined as (*as per the **Ontario Human Rights Commission***):

- 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 a 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**; (“handicap”)

Although PSI has had a long-standing commitment to accessibility for individuals with disabilities, the AODA Customer Service Standard now mandates a requirement to meet the needs of persons with disabilities with clearly defined policies and procedures. PSI has made reasonable efforts to ensure that its policies and procedures are consistent with the principles, defined by the Customer Service Standard, AODA.

- **Dignity-** Persons with a disability will be treated as valued individuals who are as deserving of service as any other customer.
- **Equality of Opportunity-** Persons with a disability will be given an opportunity equal to that given to others to obtain, use, and benefit from our goods and services.
- **Integration-** Where possible, persons with a disability will benefit from our goods and services in the same place and in the same or similar manner as any other individual. In circumstances where integration does not serve the needs of the person with a disability, goods and services will, to the extent possible, be provided in another way that takes into account the person’s individual needs.
- **Independence-** Goods and services must be provided in a way that respects the independence of persons with a disability therefore the company will always be willing to assist a person with a disability but will not do so without the express permission of the individual.

Communication

Two-way communication is a process of providing, sending, receiving and understanding information and to communicate in an effective way, PSI will consider how the disability affects the way the person expresses, receives or processes communications. PSI is committed to communicating to the public in a manner that is accessible to everyone therefore will ask the member directly the best way to communicate with him/her and will use a variety of ways to make communication accessible, for example:

- considering the needs of people with disabilities during the planning stage of services and communication development
- using plain language to make a document easier to read for people with certain learning disabilities
- offering information in alternate formats, on request:
 - Hand-write or type information back and forth
 - Braille
 - Printed hand-outs of commonly used information
 - Large print
 - Email as an alternate channel to provide accessible communication
 - Translator (i.e. sign language interpreter)

Assistive Devices

Assistive devices are devices that are used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations. Persons with a disability are permitted to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our goods or services (i.e. wheelchair, cane, walker, support person).

Service Animals

PSI is committed to welcoming individuals with disabilities who are accompanied by a trained, accredited service animal. A service animal may accompany an individual with a disability to all parts of our premises that are open to the public, and will ensure that all employees, and others dealing with the public, are properly trained on how to interact with people with disabilities, who are accompanied by a service animal.

To be considered a service animal under this standard, it must either be readily apparent that the animal is being used because of a person's disability or the person with a disability may be asked to provide a letter from a third-party confirming that it is required because of his or her disability.

PSI anticipates there will be special situations and is prepared to make every effort to accommodate the circumstances on an individual basis as they arise, keeping safety to all customers, visitors, staff, volunteers and service animals in mind. Anyone in the presence of a service animal (staff, visitors etc.) must understand that the animal is a support system for the individual and that we cannot engage in play or other type of conduct with the service animal. Everyone must respect and address the individual with the disability and not focus their attention on the service animal.

Support Persons

Any person with a disability who is accompanied by a support person is allowed to enter PSI premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on the company's premises. A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services.

Customer Service Training

PSI will provide training to all persons who deal with the public as well as those in charge with the development of this policy and its related procedures and practices.

Training will include:

- A review of the Purpose of the Act and Requirements of the Standard
- Policy review
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with disabilities who use an Assistive Device or require the assistance of a Service Animal or Support Person
- How to use equipment or devices made available on our premises to assist persons with a disability to obtain, use or benefit from our goods and services
- What to do if a person with a disability is having difficulty accessing our premises and/or services

Training will be provided to all persons to whom this Policy applies as soon as practical after he or she is assigned the applicable duties and will be retrained if changes to the policy and procedures are made.

Training will be recorded and will show the; training protocol, dates on which the training was provided and number of individuals attending the training.

Feedback

PSI welcomes and appreciates feedback regarding this Policy and its implementation and feedback can be provided the following ways:

- In person or in writing to PSI 3535 Laird Road, Mississauga, Ontario, L5L 5Z4 Attn Human Resources
- By Telephone to at (905)-858-3600 X 209
- Electronically at scosta@psiengineering.com

PSI has a feedback protocol to enable it to receive and respond to comments, including complaints. The feedback protocol is available upon request.

Posting of Documents

Notices are posted, informing the public that the documents required by the Customer Service Standard are available upon request and will be provided in a format that takes a person's disability into account. Notices and documents are available through the website and throughout the premises.

Emergency Response Plans

PSI will create an Individualized Emergency Response Plan (see Appendix A) for employees with a disability (i.e., physical or mental disability) that requires assistance during an emergency (i.e., evacuation, lockdown). Human Resources will only collect details of how to assist someone during an emergency; medical information may be collected in order to assist the individual, but details will be kept to a minimum. Each situation will be handled on a case by case basis and all information collected will be kept strictly private and confidential.

Disabilities can be temporary or permanent, therefore staff members and contractors are welcome to come forward and speak with their supervisor and/or Human Resources to discuss their individualized emergency response plan. New hires will be asked during their orientation with the Human Resources Manager and if and when there is a physical office/warehouse layout change, change in premises etc.

Staff with a disability will be asked to complete the Emergency Response Worksheet (see Appendix A) and submit it Human Resources. The worksheet will be reviewed with the staff member and an Individualized Emergency Response Plan (see Appendix A) will be completed and put in place for the individual with a disability. This plan will

indicate how the individual with a disability will be helped during an emergency situation. All Individualized Emergency Response Plans will be kept in the employees personnel file.

When a temporary disability ceases to exist, the Individualized Emergency Response Plan must be removed and shredded.

Examples of a disability are, but not limited to:

- Hearing loss (complete or partial)
- Vision loss (complete or partial)
- Injury to a limb
- Fear of enclosed spaces
- Asthma
- Speech disability
- Anxiety/Panic during emergency situations, enclosed spaces and/or crowds

Disability and the Ontario Human Rights Code

The Ontario Human Rights Code ("the Code") provides for equal rights and opportunities and freedom from discrimination. The Code along with PSI recognizes the dignity and self-worth of people with disabilities and understands that they are entitled to the same opportunities and benefits as people without disabilities.

PSI will work together with an employee with a disability who may require accommodations in order to assist the individual to perform his/her duties.

Removing Barriers and the employers Duty to Accommodate.

PSI facilities and services are designed as inclusively as possible i.e., wheelchair accessible washrooms, accessible emergency exits etc. However, accommodation is a shared responsibility. Everyone involved, including the person requesting an accommodation must work together; exchange relevant information and look for accommodation solutions together.

If an accommodation is required, the employee must advise Human Resources of what his/her disability-related needs are as related to his/her duties. PSI will work with the individual in order to best accommodate his/her needs. PSI will only collect information that is required to assist an individual perform his/her duties. Not all medical information or details of an individual's disability will be required to provide accommodation.

This policy will be reviewed during new hire orientation and on an annual basis thereafter.

Recruitment Process for individuals with a Disability

PSI will notify its employees and the public about the availability of accommodation for job applicants with disabilities. Job postings will indicate that PSI will provide accommodation during the recruitment process upon request.

Selection Process for individuals with a Disability

When inviting a job applicant for a phone screen/interview, PSI will state that accessibility accommodations are available upon request to support the individuals' participation. For example, an applicant with a hearing disability can be phone screened/interviewed via email or in other written formats. PSI will consult with the job applicant that has requested accommodation and arrange for the provision of a suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

It is the responsibility of the Accessibility Officer (Human Resources Manager) to keep track of all accommodation requests.

When making an offer of employment to an individual with a disability, the successful candidate will be advised of PSI policies for accommodating employees with disabilities directly on his/her offer letter. PSI will advise of its policies used to support its staff members with a disability upon the creation and/or change of policy and on an annual basis via email or in person.

Accommodation Plan for staff members with a disability

PSI will make every effort to provide accommodation to staff members with known disabilities. Once the employee has disclosed his/her disability to a supervisor or Human Resources, accommodation measures will be taken. It is the responsibility of the staff member with a disability to discuss/request accommodation.

In consultation with the staff member upon his/her request, Human Resources will create and document an Individualized Accommodation Plan (see Appendix A). The accommodation plan is a formal method of recording and reviewing details of accommodation.

The accommodation plan will include:

- a. How the employee with a disability participates in the development of his/her own plan
- b. How an employee is assessed on an individual basis
- c. How PSI can seek outside assistance/advice if required to help determine an individual's accommodation needs
- d. How the privacy of personal information will be protected
- e. If required, include any information regarding the individual's Workplace Emergency Response information
- f. Accommodation details
- g. How to provide the plan in an accessible format if required
- h. The schedule for how and when the next review/update of the plan will take place
- i. How PSI will inform the employee with a disability if their accommodation plan has or has not been accepted

Once the terms of the accommodation plan have been approved by all parties involved, the plan will be implemented and reviewed on a quarterly basis or as required.

Return to Work Plan for staff members with a disability

The purpose of the Return to Work Plan for staff members with a disability is to document the steps to help staff members return to work when they have been away due to a disability and require accommodations. The provisions of this policy pertain only to a staff member with a temporary or permanent disability that was not the result of a workplace injury. PSI work related injuries leading to disability will be covered under the guidelines of the Workplace Safety and Insurance Act.

The Human Resources Manager will communicate with the staff member during his/her absence to obtain updates on his/her estimated return to work date and determine if accommodations are required. Document all discussions with the individual by completing the Record of Contact form (see Appendix A) on an on-going basis. With the staff members prior consent, while the staff member is on leave, the HR Manager will make occasional contact and keep a detailed log of contact. This will assist PSI and the staff member assess their conditions for return to work as well as address other concerns that may arise.

Once the return to work discussions have begun, the staff member will complete the Return to Work Plan (see Appendix A). Once completed, the Return to Work Plan must be sent to Human Resources for review. The following measures will be taken to ensure a safe return to work;

- a. Review the staff members individual accommodation plan or create a plan if one does not exist
- b. Discuss the details of accommodation with the individual before his/her return to work
- c. Ask for a doctor's note/medical information to accompany limited duties as required
- d. Ask for a doctor's note/medical information if the individual is returning to work on full duties
- e. Outline the steps taken to facilitate the return to work
- f. Monitor and review the Return to Work Plan on a quarterly basis or as required to ensure appropriate accommodations have been made

Performance Management, Career Development and Advancement and Redeployment for staff members with a disability

PSI will take into account the accessibility requirements of individuals with disabilities as well as the individual accommodation plan during all aspects of performance management, career development and advancement and redeployment.

Definitions

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

Career Development and Advancement: providing additional responsibilities and the movement from one role to another that may be equal or higher in pay, provide greater responsibility or to be at a higher level or in any combination.

Redeployment: the reassignment of staff members to other departments or roles as an alternative to lay off or termination. Staff reassigned to another role or department will have their new role and salary analyzed with a possibility of a salary change (no change, increase or decrease) depending on the role.

When offering a staff member with a disability the opportunity for advancement, PSI will provide accommodations required in order to help the individual with a disability to succeed. Should a staff member with a disability change roles, PSI will transfer the individual accommodation plan and supports upon reassignment and make adjustments if required.

When measuring the performance of a staff member with a disability, PSI will look at the difference between disability related issues and performance related issues. Supervisors are asked to confer with Human Resources for assistance providing feedback as required.