

Accessibility for Ontarians with Disabilities Act

Integrated Accessibility Standards Policy

Date: August 25, 2014

Responsible Department: Human Resources (CAO)

Policy Recommended By: Human Resources (CAO)

Policy Approved By: Partnership Board

Scope: This policy applies to Partners/Lawyers/Employees of Harrison Pensa and Lexis Services.

Policy for Harrison Pensa LLP and Lexis Services LP (the management firm for Harrison Pensa LLP), hereinafter referred to as the 'Firm'.

BACKGROUND

The following policy has been established by the Firm to govern the provision of its services in accordance with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the Accessibility for Ontarians with Disabilities Act, 2005. These standards are developed to break down barriers and increase accessibility for people with disabilities in the areas of information and communications, employment and transportation.

The Firm is governed by this policy as well as the Accessibility Standards for Customer Service Policy, the Accessibility for Ontarians with Disabilities Act, 2005 and the Human Rights Code in meeting the accessibility needs of persons with disabilities.

This policy applies to all staff and lawyers of the Firm, whether part-time, full-time or casual. The policy also applies to others in the work context, such as volunteers, articling students, co-op students, and dependent and independent contractors.

Definitions

Accessible Formats -formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats may include large print, Braille, and audio electronic formats such as DVDs, CDs.

Communication Supports -supports that individuals with disabilities may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate.

Communications -the term communications as it is used in the Information and Communications Standard refers to the interaction between two or more people or entities when information is provided, sent or received.

Conversion Ready -refers to an electronic or digital format that assists conversion into an accessible format such as Braille, large print, audio cassettes, CDs, DVDs, etc.

Information -the term information as it is used in the Information and Communications Standard refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.

POLICY & PROCEDURES

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

1. Accessibility Plan
2. Training
3. Information and Communications Standards
 - a. Feedback
 - b. Accessible Formats and Communication Supports
 - c. Accessible Websites and Web Content
4. Employment Standards
 - a. Recruitment
 - b. Recruitment, Assessment or Selection Process
 - c. Notice to Successful Applicants
 - d. Informing Employees of Supports
 - e. Accessible Formats and Communication Supports for Employees
 - f. Workplace Emergency Response Information
 - g. Documented Individual Accommodation Plans
 - h. Return to Work Process
 - i. Performance management, Career Development and Advancement & Redeployment

Accessibility Plan

The Firm will develop, maintain and document an Accessibility Plan outlining the Firm’s strategy to prevent and remove barriers from its workplace and to meet its requirements under the Regulation.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the Firm’s website. Upon request, the Firm will provide a copy of the Accessibility Plan in an accessible format.

In addition, the Firm will prepare annual status reports on the progress of measures taken to implement the Firm’s strategy outlined in its Accessibility Plan, and will post the status reports on its website. Status reports will also be made available in an accessible format upon request.

Training

The Firm ensures that training is provided on the requirements of the accessibility standards referred to in the Regulation as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing the Firm’s policies; and,
- all other persons who provide goods, services or facilities on behalf of the Firm.

As reflected in Ontario Regulation 191/11, regardless of the format, training covers the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11.
- A review of the requirements of the Human Rights Code.
- The Firm's policies, procedures and practices pertaining to meeting the accessibility needs of persons with disabilities.

The Firm will provide training as soon as practicable. Training will be provided to new employees, volunteers, agents and/or contractor who deal with the public or act on our behalf during orientation. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

The Firm will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

The Firm will ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, the Firm will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

The Firm will consult with the person making the request in determining the suitability of an accessible format or communication support.

The Firm will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

The Firm will ensure that its Internet and Intranet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment

The Firm will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process

The Firm will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Firm will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, the Firm will verbally notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

The Firm will inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, the Firm will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Firm will consult with the employee making the request.

Workplace Emergency Response Information

The Firm 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 if the Firm is aware of the need for accommodation due to the employee's disability. The Firm will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, the Firm will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Firm to provide assistance to the employee.

The Firm will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed, and, when the Firm reviews its general emergency response policies.

Documented Individual Accommodation Plans

The Firm will maintain a written process, through its Human Rights Policy, for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

The Firm will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps the Firm will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e. the Workplace Safety Insurance Act, 1997).

Performance Management, Career Development and Advancement & Redeployment

The Firm will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Revision History/Replaced Policies:

Revision 0.0 August/2014