

Copley Policy: HR 2.01.01	Date of Issue:	September 20, 2013
Title: AODA – Integrated Accessibility Standard Regulation (IASR) Employment Policy	Revision Date:	July 12, 2023
Approved by: Deana Blair	Review Frequency:	Per Legislation

PURPOSE

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Employment Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Copley Ltd. shall follow the principles of dignity, independence, integration and equal opportunity.

SCOPE

The AODA Policy applies to all employees of Copley Ltd.

DEFINITIONS

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

STANDARD AND PROCEDURES

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

A. General Requirements

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

Establishment of Accessibility Policies and Plans

Copley Ltd. will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. Copley Ltd. will include a statement of its commitment (See Appendix A) to

meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request. Copley Ltd. will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request. Copley Ltd. will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility. Status reports will be prepared that will report on the progress of the steps taken to implement Copley Ltd.'s accessibility plan.

Training Requirements

Copley Ltd. will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Copley Ltd.'s policies, and all other persons who provide goods, services or facilities on behalf of Copley Ltd.. Training will be provided as soon as is reasonably practicable. Training will be provided on an ongoing basis to new employees and as changes to Copley Ltd.'s accessibility policies occur.

Records

Copley Ltd. will maintain records on the training provided, when it was provided and the number of employees that were trained.

B. Recruitment, Assessment and Selection

Copley Ltd. will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Copley Ltd. will consult with the applicant and provide or arrange for suitable accommodation. Successful applicants will be made aware of Copley Ltd.'s policies and supports for accommodating people with disabilities.

C. Accessible Formats and Communication Supports for Employees

Copley Ltd. will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur. If an employee with a disability requests it, Copley Ltd. will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Copley Ltd. will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

D. Workplace Emergency Response Information

Where required, Copley Ltd. will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee. This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Copley Ltd. reviews general emergency response policies.

E. Documented Individual Accommodation Plans

Copley Ltd. will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines. Copley Ltd. must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employee can request an evaluation by an outside medical expert, or other experts (at the employee's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

F. Performance Management and Career Development and Advancement

Copley Ltd. will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.

G. Return to Work

Copley Ltd. will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work. The return to work process will outline the steps Copley Ltd. will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

H. Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

Individual accommodation plans will be consulted, as required.

ROLES AND RESPONSIBILITIES

Human Resources will manage the AODA policy and program at Copley to ensure compliance with the law.

Employees will communicate their needs for accommodations to Human Resources in good faith.

Supervisors and managers will ensure that AODA plans are being implemented.

COMMUNICATION, TRAINING AND IMPLEMENTATION

The AODA Employment Policy will be discussed during the orientation of new employees. Regular communication between the employee requiring an AODA plan, Human Resources, supervisors and managers will occur as needed.

This policy will be available to employees online and in the Policy Manual.

EVALUATION

Human Resources will complete the Program Evaluation form annually.

FORMS

The signed original copy of this policy will be stored with Human Resources.

REFERENCE MATERIALS

Accessibility for Ontarians with Disabilities Act, AODA

REVISIONS

#	Date	Notes	Initials
1	July 12, 2023	Created standard format. Added Roles and Responsibilities section. Added Communication, Training and Implementation section. Corrected senior executive name and Forms section.	MS

Appendix A

Statement of Commitment to Accessibility

Copley Ltd. is committed to providing a barrier-free environment for our customers, employees, suppliers and visitors who enter our premises or access our information. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment, and Transportation, and eventually, for the Built Environment.

Our organization has made a commitment to accessibility for everyone who uses our services because this makes good business sense, and it is also a legal obligation. Our organization Copley Ltd. has an important responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance with accessibility legislation by incorporating policies, procedures, equipment requirements, training for employees, and best practices. We will review these policies and practices on a regular basis. Our commitment to making our organization accessible to everyone includes the integration of accessibility legislation with our policies, procedures, programs, and training. We are committed to reviewing and incorporating the following information with our employees:

- Legislation regarding the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005.
- Integrated Accessibility Standards for Information and Communications, Employment, and Transportation.
- Accessible employment practices such as recruitment, assessment, and selection.
- Customer service standards.
- Accessible communication supports and information formats (both digital and non-digital).
- Communicating with people with various forms of disabilities.
- Assistive devices, mobility aids, service animals and support persons.
- Notices of service disruptions (temporary or long-term).
- Copley Ltd.'s relevant policies and procedures regarding accessibility.
- Reporting procedures.
- Training procedures.

Copley Ltd. realizes that providing accessible and barrier-free environments for everyone is a shared effort. As a community, all businesses and services must work together to make accessibility happen. For more detailed information on our accessibility policies, plans, and training programs, please contact Human Resources.

Sincerely,
Deana Blair
Director of Finance and Human Resources

Copley Policy: HR 2.01.02	Date of Issue:	September 20, 2013
Title: AODA – Integrated Accessibility Standard Regulation (IASR) Information and Communications Policy	Revision Date:	July 12, 2023
Approved by: Deana Blair	Review Frequency:	Per Legislation

PURPOSE

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Information and Communications Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of information and communications services and materials for people with disabilities.

All information and communications materials and services provided by Copley Ltd. shall follow the principles of dignity, independence, integration and equal opportunity.

SCOPE

The AODA Policy applies to all employees of Copley Ltd.

DEFINITIONS

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – An electronic or digital format that facilitates conversion into an acceptable format.

STANDARD AND PROCEDURES

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

- A. General Requirements
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Exceptions

A. General Requirements

General requirements that apply across all of the four (4) standards, Information and Communications, Employment, Transportation and Design of Public Spaces, are outlined as follows.

Establishment of Accessibility Policies and Plans

Coppley Ltd. will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. Coppley Ltd. will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request. Coppley Ltd. will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request. Coppley Ltd. will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans. Status reports will be prepared that will report on the progress of the steps taken to implement Coppley Ltd.'s accessibility plan.

B. Accessible Formats and Communication Supports

Unless deemed unconvertible, Coppley Ltd. will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual. Coppley Ltd. will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

C. Accessible Websites and Web Content

Coppley Ltd. will ensure that any new website and the new website's content published after January 1, 2014, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the schedule set out in the IASR.

D. Exceptions

The Information and Communications Standard does not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Coppley Ltd. will ensure that the individual who made the request is provided with an explanation and a summary of the information. Coppley Ltd. will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.

ROLES AND RESPONSIBILITIES

Human Resources will manage the AODA policy and program at Coppley to ensure compliance with the law.

Employees will communicate their needs for accommodations to Human Resources in good faith.

Supervisors and managers will ensure that AODA plans are being implemented.

COMMUNICATION, TRAINING AND IMPLEMENTATION

The AODA Employment Policy will be discussed during the orientation of new employees. Regular communication between the employee requiring an AODA plan, Human Resources, supervisors and managers will occur as needed.

Training Requirements

Copley Ltd. will provide training for its employees and volunteers regarding the IASR and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Copley Ltd.'s policies, and all other persons who provide goods, services or facilities on behalf of Copley Ltd. Training will be provided on an ongoing basis to new employees and as changes to Copley Ltd.'s accessibility policies occur. Copley Ltd. will maintain records on the training provided, when it was provided and the number of employees that were trained.

This policy will be available to employees online and in the Policy Manual.

EVALUATION

Human Resources will complete the Program Evaluation form annually.

FORMS

The signed original copy of this policy will be stored with Human Resources.

REFERENCE MATERIALS

Accessibility for Ontarians with Disabilities Act, AODA

REVISIONS

#	Date	Notes	Initials
1	July 12, 2023	Created standard format. Corrected senior executive name and Forms section.	MS

Copley Policy: HR 2.01.03	Date of Issue:	September 20, 2013
Title: AODA - Accessible Customer Service Plan	Revision Date:	July 12, 2023
Approved by: Deana Blair	Review Frequency:	Per Legislation

PURPOSE

This policy is intended to meet the requirements of *Accessibility Standards for Customer Service, Ontario Regulation 429/07* under the *Accessibility for Ontarians with Disabilities Act, 2005*, and applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by Copley Ltd. shall follow the principles of dignity, independence, integration and equal opportunity.

SCOPE

The AODA Policy applies to all employees of Copley Ltd.

STANDARD AND PROCEDURES

A. The Provision of Goods and Services to Persons with Disabilities

Copley Ltd. will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all customers receive the same value and quality;
- allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- using alternative methods when possible, to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the customer's disability.

B. Assistive Devices

Customer's own assistive device(s): Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Copley Ltd. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

D. Support Persons

If a customer with a disability is accompanied by a support person, Copley Ltd. will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

COMMUNICATION, TRAINING AND IMPLEMENTATION

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Copley Ltd. In the event of any temporary disruptions to facilities or services that customer's with disabilities rely on to access or use Copley Ltd.'s goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will Include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable
- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur Copley Ltd. will provide notice by:

- posting notices at the main entrance of the building with the service disruption.
- by any other method that may be reasonable under the circumstances.

F. Feedback Process

Copley Ltd. shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers. Feedback may be provided verbally, by completion of our feedback form or email.

Submitting Feedback:

Customers or employees can submit feedback to:

905-529-1112
107 MacNab Street North, Hamilton, ON, L8R 2L9
info@copley.com

Customers that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Training will be provided to:

- all employees who deal with the public
- those who are involved in the development and approval of customer service policies, practices and procedures.

Training Provisions:

As reflected in *Ontario Regulation 429/07*, regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the *Accessibility Standards for Customer Service, Ontario Regulation 429/07*.
- 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;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- Copley Ltd.'s policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Training Schedule:

Copley Ltd. will provide training as soon as practicable. Training will be provided to new employees who deal with the public. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

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

Notice of Availability and Format of Documents

Copley Ltd. shall notify customers that the documents related to the *Accessibility Standard for Customer Service* are available upon request and in a format that takes into account the customer's disability.

This policy will be available to employees online and in the Policy Manual.

EVALUATION

Human Resources will complete the Program Evaluation form annually.

FORMS

The signed original copy of this policy will be stored with Human Resources.

REFERENCE MATERIALS

Accessibility for Ontarians with Disabilities Act, AODA

REVISIONS

#	Date	Notes	Initials
1	July 12, 2023	Created standard format. Corrected senior executive name and Forms section.	MS