

Accessibility Program

PURPOSE:

Steelcraft is committed to providing an environment in which people with disabilities are treated with respect and dignity.

The Accessibility Program is intended to ensure appropriate treatment of employees, visitors and other stakeholders with disabilities.

SCOPE:

The Accessibility Program applies to all employees, volunteers, agents, contractors and/or representatives of Steelcraft. All terms contained in this program will be as defined in the Accessibility for Ontarians with Disabilities Act, 2005.

APPLICABLE LEGISLATION:

- Accessibility for Ontarians with Disabilities Act, 2005
- Ontario Human Rights Code R.S.O. 1990

REFERENCE DOCUMENTATION:

- Document # HRACC001 - Accessibility Policy
- Document # HRACC003 – Accessible Customer Service Training Program
- Document # HRACC004 – Accessible Customer Service Quiz
- Document # HRACC005 – Accessibility Training Program – for Supervisors / Managers
- Document # HRACC006 – Potential Emergency Response Barriers Self-Assessment Form
- Document # HRACC007 – Individualized Emergency Response Information

RESPONSIBILITIES:

The Employer / Senior Management is responsible to ensure the following:

- Steelcraft is fully compliant with all requirements of AODA and any other applicable legislation.

The Human Resources department is responsible for the following:

- Develop the Accessibility program and associated procedures.
- Ensure consistent application of the program and procedures.
- Educate employees on the requirements of the program, as applicable.
- Report on progress as required under AODA and other applicable legislation.
- Make the program available, including posted on the Company website, and make such available in accessible formats upon request.
- Be responsible for and maintain confidentiality of all documentation and administration related to the program.
- Respond to complaints received through the feedback mechanism described in the program.
- Work with the person with a disability to identify barriers and, where applicable, identify and implement ways to remove those barriers.

Supervisors and Managers of Steelcraft are responsible for the following:

- Ensure employees are educated about the program, as applicable.
- Ensure consistent application of the program and procedures.
- Work with the person with a disability to identify barriers and, where applicable, identify and implement ways to remove those barriers.

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Employees, volunteers, and any other persons making contact with the public on behalf of Steelcraft are responsible for the following:

- Treat persons with disabilities in a way that takes into account their disability and responds in a respectful manner.
- Take an active role in the Accessibility program as it pertains to them.
- Report any concerns about the Accessibility program.
- Attend scheduled meetings and complete assigned training, as required.

NOTE:

The Accessibility Program in its current state contains information and guidelines surrounding the provision of services to third parties and/or customers, and individualized emergency response plans as they affect employees. The Program will be updated to address accessibility in employment, information and communications, and the physical (“built”) environment as applicable policies and practices are established.

PROGRAM:

1) Program Objectives

- To ensure that all interactions between Steelcraft and its stakeholders follow the principles of dignity, independence, integration and equal opportunity.
- To identify barriers and, where applicable, implement ways to remove those barriers to proper service of persons with disabilities.
- To ensure safety of stakeholders with disabilities.
- To take advantage of the unique skills and backgrounds that persons with disabilities can bring to Steelcraft.
- To comply with all relevant legislation, including the Accessibility for Ontarians with Disabilities Act (AODA), 2005.

2) Note on Confidentiality

Steelcraft will take all appropriate steps to ensure the confidentiality of the information collected and used in the Accessibility Program. Individuals responsible for the management of the Accessibility Program will have appropriate understanding and, where required, training on confidentiality and security of employee information.

3) Accessibility Procedures

In most instances, Steelcraft can work with a customer or third party with a disability to remove barriers to service, if those barriers are known or ought to reasonably be known. The following provides examples of the ways in which barriers can be removed:

a) Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services offered by Steelcraft. 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.

Staff will be instructed not to touch or handle any assistive device without permission, and to ensure they do not move assistive devices or equipment, such as canes and walkers, out of the reach of the individual. Additionally, staff will be trained to ask the individual “how can I help?” should they not be familiar with the assistive device being used.

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b) Service Animals

Due to the nature of the work performed at our facilities, the presence of service animals on our premises may pose a safety threat to themselves, our visitors and our employees. Generally, service animals will only be allowed on the parts of our premises which are open to the public, which is limited to the reception area. The Company will assess each situation in which a service animal is required on an individual basis, with safety of all parties being the primary consideration. Staff will be trained that service animals are working animals, not pets, and they should not be touched or addressed.

c) Support Persons

A person with a disability who is accompanied by a support person is allowed to have that person accompany them on our premises. Staff will be trained to speak directly with the person with a disability, and not to the support person.

d) Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Steelcraft will notify customers promptly by placing a notice at the front door and other relevant entrances of the affected facility. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

4) Accessible Employment

Steelcraft is committed to providing employment which is free of barriers for persons with disabilities. This includes accessibility in Individualized Emergency Response Information.

Individualized Emergency Response Information is a plan to help employees with disabilities during an emergency, or emergency information that is formatted so an employee with a disability can understand it.

a) Provision and Timing

Steelcraft will provide individualized workplace emergency response information to an employee with a disability, if individualized information is necessary based on the type of disability, and if Steelcraft is aware of the need for accommodation. Steelcraft will provide this information as soon as is practicable after becoming aware of the need for such accommodation.

b) Identification of Need

Employees will be asked to self-identify as requiring such accommodation upon the release of the Accessibility Program, and during orientation sessions for new employees. All employees will always have the opportunity to self-identify at any time by approaching their immediate supervisor/manager, or the Human Resources department. Supervisors/managers will also be responsible for identifying the need for accommodation when it is evident (eg. if an employee has a broken leg).

c) Development Method

Should accommodation be requested, employees will complete a survey to determine what accommodations are required. This survey will be reviewed by the employee, supervisor/manager and Human Resources department together. The employee, supervisor/manager and Human Resources department are responsible for collaborating to determine how an employee can receive the information they need in an accessible format, or what accommodations to the Individualized Emergency Response Information may be required.

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Should relevant medical documentation be required, Steelcraft may request the employee to provide such information.

The employee is permitted to request representation from (a) their bargaining unit representative; or (b) any other representative from the workplace if they are not represented by a bargaining unit, if they so choose. This request may be made verbally, and must be made prior to the scheduled start time of the meeting.

d) Independent Evaluation

Should Steelcraft wish, the employer may request, in writing, that the employee attend evaluation by an independent medical provider, at the employer's cost, to assist in determining if and how accommodation can be achieved.

e) Assistance from Designated Persons

Should accommodations to the Individualized Emergency Response Information require the assistance of another designated person, Steelcraft will obtain written consent of the employee with a disability to share the workplace response information with the designated person, and only information which is absolutely necessary will be shared.

f) Review

The Individualized Emergency Response Information will be reviewed should the employee change work locations, should their accommodation needs change, or should Steelcraft's emergency procedures which affect that employee change.

g) Privacy

Any information provided through this process will be kept in the employee's locked Medical file, and will be accessible only to Human Resources. The employee, or employee's direct supervisor/manager will be entitled to access this information upon request.

h) Denial Method

If a request for Individualized Emergency Response Information is denied, this will be communicated to the requesting employee both in writing, and verbally in a meeting with Human Resources and the employee's supervisor.

5) Feedback

Individuals who wish to provide feedback on the way Steelcraft operates with respect to persons with disabilities can:

- Suggest the feedback to the representative they are interacting with in the manner in which they feel most comfortable
- Forward the feedback in writing to Steelcraft head office in a letter clearly marked "Confidential" at: Steelcraft Inc., Attn: Human Resources, PO Box 130, 446 Albert St., Waterloo ON N2J 4A1
- Email the feedback to steelcraftaccessibility@steelcraftinc.com

All feedback is to be forwarded immediately to the Human Resources department. All feedback will be responded to within 10 business days.

6) Training

Steelcraft will provide training as applicable based on roles and duties.

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a) Training for Employees who may Interact with People with Disabilities

Steelcraft will provide training on how to interact with people with disabilities to employees who deal with the public or third parties, including customers, vendors or suppliers, on the company's behalf. Individuals in the following types of roles will be trained:

- Senior Management
- Receptionists
- Sales and Purchasing
- Quality Control / Continuous Improvement
- Human Resources / Payroll / Health & Safety
- Accounting
- Customer Service
- Supervisors and Plant Managers
- Shipping / Receiving
- Engineering
- Information Technology
- Other employees as deemed necessary based on their level of interaction with the public or third parties

This training will be provided to new staff during orientation as applicable. Existing staff will also be trained upon implementation of the Accessibility Program, and when significant changes are made to the program.

This training will include:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005, which will detail the applicable standards which impact these employees
- An overview of Steelcraft's Accessibility Policy and this program
- How to interact and communicate with people with various types of disabilities
- How to interact with people who use assistive devices or require the assistance of support persons or service animals
- What to do if a person is having difficulty accessing our goods/services

b) Training for Employees who Develop Policies, Practices and Procedures

Steelcraft will provide training to employees who develop policies, practices and procedures on the provision of goods and services to people with disabilities and how the company responds to any feedback or takes action on any complaints. This will generally include individuals in the following roles:

- Senior Management
- Sales Managers
- Human Resources

This training will be substantially similar to the training described in section 6) a), but in greater detail as required. This training will be provided to new staff during orientation as applicable, and to existing staff upon implementation of the Accessibility Program and when significant changes are made to the program.

c) Training for All Employees

Steelcraft will provide training on accessibility to all employees. At present time, this training will include a presentation of Steelcraft's Accessibility Policy, and notification of the availability of Individualized Emergency Response Information. The scope of this training will be expanded as this Program is expanded. This training will be provided to new staff during orientation, and to existing staff upon implementation of the Accessibility Program and when significant changes are made to the program.

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7) Training Content

a) Understanding Barriers

It is important to remember that “barriers” extends to more than physical barriers which may prevent persons with physical disabilities from accessing services, such as a building with no wheelchair ramp. Types of barriers that need to be considered include:

- Attitudinal Barriers – caused by people discriminating against people with disabilities, such as thinking that a person with a disability is inferior
- Information or Communication Barriers – caused when information cannot be easily understood by persons with disabilities
- Technology Barriers – such as when a technology cannot be modified to support assistive devices
- Organizational Barriers – occur when an organization’s practices, policies and procedures discriminate against people with disabilities
- Architectural Barriers – physical features of buildings or spaces that cause problems for people with disabilities.

b) Interacting with Persons with Disabilities

The person with a disability is the best source of information about their individual needs. A solution can be simple, and the individual will likely appreciate your attention and consideration to their needs. If you do not know the best way to interact with a person with a disability, or if the person with a disability is having difficulty in accessing Steelcraft’s goods and services, you should simply ask “How can I help you?”

While a person with a disability has individualized needs, many disabilities can be generalized to help you better interact and communicate. The following are examples of common disabilities, common assistive devices which may be used, and how you can best interact in order to show respect for the individual and account for the disability:

i) Persons with Physical Disabilities

A person with a physical disability has difficulty moving, standing, sitting or physically communicating. Physical disabilities come in many types and degrees, and are much broader than mobility issues. People who have limited use of their hands or arms, who have arthritis, heart or lung conditions, or amputations are also considered to have physical disabilities. Persons with physical disabilities may use assistive devices including wheelchairs, crutches, walkers, scooters, canes, orthotic braces and prosthetic limbs.

Do not touch assistive devices without permission. If you have permission to move, for example, a person’s wheelchair, don’t leave them in an awkward, dangerous or undignified position, such as facing a wall or in the path of opening doors. If you need to have a lengthy conversation with someone who uses a wheelchair or scooter, consider sitting so you can make eye contact at the same level.

ii) Persons with Vision Loss

Visual impairments reduce one’s ability to see or see clearly. Very few people are totally blind – many have limited/low vision, such as tunnel vision (a lack of peripheral vision), side vision (a lack of direct vision), or can see object outlines or the direction of light. Persons with vision loss may use assistive devices including a magnifier, guide dog or white cane.

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When you know someone has vision loss, don't assume the individual can't see you, as many people who have low vision still have some sight. Identify yourself when you approach, and speak directly to the person. Ask the person if they would like you to read any printed material out loud to them. When you are providing directions or instructions, be precise and descriptive. Offer your elbow to guide them, if needed, but never touch them without permission, except in case of emergency.

iii) Persons with Hearing Loss

Persons with hearing loss come in varying degrees. Persons who are hard of hearing use spoken language to communicate. Persons who are deafened were born with full hearing, but lost it gradually or suddenly. Persons who are deaf have severe to profound hearing loss, with little to no residual hearing. Persons who are hard of hearing may use assistive devices such as hearing aids and technical devices; some may communicate through speech-reading; and some may use sign language, finger spelling or writing. Persons who are deaf may use American Sign Language, hearing aids, technical devices or cochlear implants, or speech-reading.

Make sure you are in a well-lit area, where the person can see your face and read your lips. As needed, attract the person's attention before speaking – try a gentle touch on the shoulder or a wave of your hand. If the person uses a hearing aid, reduce background noise or move to a quieter area. If necessary, ask if another method of communicating would be easier (such as using a pen and paper).

iv) Persons who are Deafblind

A person who is deafblind may have some degree of both hearing and vision loss. Many people who are deafblind will be accompanied by an intervener – a professional support person who helps with communication.

A person who is deafblind is likely to explain to you how to communicate with them, perhaps with an assistance card or a note. Speak directly to the person, and not to the intervener.

v) Persons with Speech or Language Impairments

Don't assume that a person with a speech or language impairment also has another disability. Whenever possible, ask questions that can be answered with "yes" or "no". Be patient – don't interrupt or finish the person's sentences.

vi) Persons who have Learning Disabilities

'Learning disability' describes a wide range of information processing disorders, that may affect visual, auditory and organizational abilities. Some examples include dyslexia (problems in reading and related language-based learning), dyscalculia (problems in mathematics) and dysgraphia (problems in writing).

Be patient – persons with some learning disabilities may take a little longer to process information, to understand, and to respond. Try to provide information in a way that takes into account the person's disability. For example, some persons with learning disabilities find written words difficult to understand, while others may have problems with numbers and math.

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vii) Persons with Intellectual / Developmental Disabilities

Developmental or intellectual disabilities involve a permanent limitation in a person's ability to learn, communicate, do everyday physical activities, and live independently. Examples can include Autism or Down's Syndrome. Don't make assumptions about what the person can do. Use plain language, and provide only one piece of information at a time.

viii) Persons who have Mental Health Disabilities

Mental health disability is a broad term for many disorders that can range in severity – for example, anxiety due to hallucinations, mood swings, phobias or panic disorder. If you sense or know that a person has a mental health disability, be sure to treat them with the same respect and consideration you have for everyone else. Be calm, confident and reassuring. If the person appears to be in crisis, ask them to tell you the best way to help.