

ACCESSIBILITY STANDARD FOR EMPLOYMENT

Policy

Global Contract Inc. (hereinafter known as the “Company”) is required as an obliged organization to comply with the standards of the AODA legislation.

The Company is committed to ensuring that Persons with Disabilities have the same opportunity of access to employment opportunities and related services as do all employees.

The Company is further committed to meeting the accessibility needs of persons with disabilities in a timely manner through its human resources policies, practices, procedures and employment-related services.

Purpose

These commitments are intended to ensure that accessibility issues are duly considered in the Company’s decision-making processes and provide a framework in which such accessibility initiatives and plans are created in order to move the organization towards the AODA goal of improved accessibility for persons with disabilities with respect to employment matters.

Scope

This standard applies to all employees and prospective employees in the Company’s Ontario facilities.

Responsibility

It is the responsibility of Company managers, supervisors, department heads and team leaders to ensure that employees follow the guidelines established in this Standard.

Members of management must see to the training of employees with respect to accessibility. Human Resources personnel will ensure that their practices incorporate accessibility procedures.

Definitions

- *accessible formats* refer to Company-created print, audio and electronic formats. There are ways to produce information in formats that can be accessed by persons who are not able to read printed or electronic documents. Formats chosen will depend upon the requirements of the individuals. Formats include print, digital/electronic, e-mail and website (internet and intranet)
- *communication supports* refer to methods adopted to overcome communication barriers

GLOBAL *Contract*

- *disability*, as defined in the Ontario Human Rights Code is : “(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, amputation, lack of physical coordination, 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”; (b) a condition of mental impairment or a developmental disability; (c) a learning disability or a 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”
- *employee* means every person who is paid wages by the Company
- *persons with disabilities* are individuals who have a disability as defined under the Ontario Human Rights Code
- *workplace barriers* - see attachment 1.0 on “Barriers in the Workplace”

Recruitment, assessment and selection procedures

The Company will ensure in its recruitment, assessment and selection procedures that accommodation will be provided to individuals who self-identify as having disabilities. Individuals who are chosen by the Company for the selection process will be informed of accessibility measures provided by the Company in this regard.

Job advertisements will focus on position requirements and include no discriminatory job requirements.

The Company is committed to a transparent and merit-based system of recruitment and selection. No job applicant will receive less favorable consideration for reasons of age, gender, family status, creed, ethnic origin, sexual orientation or marital status.

The process of recruitment and selection will be fair, systematic, objective, efficient and effective, ensuring equality of opportunity. Consideration will be given to the skills and attributes required to perform the job effectively, utilizing a job description which is based on the core competencies of the position.

Internal and external job postings will outline requirements of the job, including essential criteria, skills, education and knowledge. Postings will be arranged through the Human Resources Department.

GLOBAL *Contract*

Job applicants will be considered on their merits and not for a disability. At the same time, candidates are encouraged to request accommodation if this is necessary to assist them in performing a job.

Hiring managers will be specifically trained in accessibility matters. The hiring manager is also responsible for providing an up-to-date job description for a position which is barrier-free. The Human Resources Department will review job descriptions to ensure this requirement is met.

Job applicants will be short-listed and the hiring manager, together with Human Resources personnel, will interview selected candidates with a set of questions based on the position. Such questions will be pre-developed and barrier-free. If a selected candidate requests accommodation in this process, the Company will undertake a review of the necessary requirements in order to make such an accommodation for the interview process. Records of an interview will be kept by Human Resources.

Reference checks will be undertaken by Human Resources personnel who will also prepare the employment contract. The contract must be accepted and signed before the employee commences work at the Company.

New employees will participate in an orientation process through the Company's Human Resources and Payroll Departments and their performance will be reviewed during an agreed-to probationary period (if applicable).

The Company will therefore endeavor to reduce/eliminate recruitment barriers through managerial commitment to accessibility standards of the AODA, providing training, technical assistance and special accommodation measures suited to individual needs.

The Company also complies with the requirements of the Federal Contractors Program for the Employment Equity Act which respect to persons with disabilities, identifying members of this target group for recruitment in various occupations on an ongoing basis.

There are employment agencies (temporary and full-time) which specialize in providing candidates who have disabilities. The Company will consider outreach initiatives in this regard.

When an offer of employment is made to an individual, the Company will, as part of its orientation program, advise the individual about its accessibility programs.

As AODA standards policies are introduced or updated, such information will be communicated to employees. Company employees, through training, will be made aware that such accessibility measures are made available through its hiring processes.

When an employee requests communication supports or accessible information formats, the Company will work with the individual to provide such supports in a meaningful way to ensure the individual can perform his or her job.

Individualized accommodation plans

Such plans will be documented and tailored to an individual's needs.

The plans will be developed with the participation of the individual.

Employee privacy will be taken into consideration at all times.

Individual plans will be changed when either the physical environment is adapted or the employee moves to another workplace venue.

Workplace accommodation measures will review the following criteria:

- modifying an employee's work environment,
- modifying work location (redeployment),
- modifying work schedules,
- modifying work being performed and providing retraining, and
- providing special equipment, tools or aids

Health and safety and return-to-work

The Company is committed to providing a safe and healthy workplace environment. In the event of a work-related injury, management will undertake as soon as possible to work towards an early return-to-work to either full duties or modified work. Modified work will be reassessed on a regular basis with a goal of returning to full duty. The Company will also work within the requirements of the Workplace Safety and Insurance Act in this regard.

The return-to-work process for persons with disabilities will require, if necessary, an individualized accommodation plan, communication with the person with a disability and be developed by qualified employees (eg, health and safety personnel together and the Human Resources Department).

Non work-related employee illness or injuries will be assessed on an individual basis by the Company Health & Safety Representative who will liaise with the employee to formulate a return-to-work plan.

Short and long-term absences will be assessed accordingly and a Record of Employment may be issued for illness or a long-term disability application to the Company's insurer. The Human Resources Department is responsible for briefing an employee about such processes.

The Health & Safety Representative will work together with production and office management to review employee safety issues as well as comply with WSIB requirements. The Company's Joint Health & Safety Committee and its certified management and worker

representatives will also play a role in this respect. Trained first aiders will be informed about any persons with disabilities and their accommodation needs within the workplace.

Company managers, supervisors and team leaders are responsible as well for the health and safety of employees under their direction and are expected to be involved at all stages of the return-to-work process.

In the event of a workplace emergency (eg, fire) an individualized emergency plan will be utilized to ensure the safety of any self-identified persons with disabilities. The plan will take into consideration, location, exit strategy and support personnel. (Back-up personnel will be identified should key personnel be absent from work for whatever reason). All employees, as part of their orientation program at the time of their hire, will be familiarized with exit routes in their building.

Such measures will be communicated to the employee as soon as possible after the employee has identified his or her disability to Company management. Any individualized workplace emergency response information will be kept confidential and be communicated, when deemed necessary, to members of the Joint Health and Safety Committee.

Employees are responsible for preventing work-related illness and injury and cooperating fully in any return-to-work process, including: the immediate reporting of any illness or injury, seeking medical attention, maintaining contact with management and advising of any accommodation requirements.

Medical information that is made available to the Company and is necessary in reaching a return to work will be kept confidential. The Company may ask an employee who has self-identified as having a disability for medical information insofar as this information relates to the employee's ability to perform the essential functions of a job.

Performance management

The Company will take into consideration the accessibility needs and accommodation of persons with disabilities in administering performance management processes.

Performance management is necessary for improving organizational and employee effectiveness in meeting Company goals (financial, production, etc). Performance expectations and goals are identified, communicated and monitored for employees.

Management will utilize a standardized performance review template for this process as well as identify training necessary to either improve performance or advance employee skills in order to better benefit the organization and facilitate employee career development and advancement.

The Company will endeavor to provide training material in accessible formats for employees. If unable to do so, Management will communicate this to the requesting employee.

Performance criteria will be based on clear and visible outcomes. The review will provide employees with feedback about their performance and allow employees to give management their feedback. Self-identified persons with disabilities will have the same access to training and development opportunities as other employees. An employee with a disability who is not maintaining work standards is expected to have the same opportunity to improve his or her work standards as other employees. If it is found that the disability is the root cause for an employee not being able to maintain performance standards than the Company will review accommodation measures in this regard and establish an individualized accommodation plan.

Career development, advancement and promotion

The Company will take into consideration the accessibility needs and accommodation of persons with disability when the Company advances or promotes the employee.

Staff training

The Company will provide training on the AODA standards and the Ontario Human Rights Code insofar as it applies to the accommodation of persons with disabilities within the workplace. Such training will be provided to members of management and to those employees who interact with the public (such as sales and customer service representatives). The Company will maintain its training records.

Modifications to company policies

The Company's employment-related policies will be modified or amended to ensure that they respect the principles of accessibility and accommodation of persons with disability.

Such changes will be communicated through on-line notices on the Company intranet, written notification or in updated policy or benefit manuals. A person with a disability may request alternate means of communication which will be assessed and acted on in a timely manner by the Company.

Job descriptions

Job descriptions are developed to ascertain requirements to suitably perform a task or tasks – what skill, effort, responsibilities and education are required. Jobs should be assessed and kept up-to-date to ensure that such functions are still essential to a job's performance and is barrier-free.

Record-keeping and privacy

The Human Resources Department will collect, file, update and maintain individualized employee accommodation records, emergency evacuation plans and any self-identified medical documentation. Such records will be kept in a secure location and maintained on a confidential basis, respecting employee privacy.

Complaint process

If any person with a disability is of the opinion that in some way his or her employment has been negatively impacted solely for reasons of a disability, this concern should be brought to the immediate attention of the Human Resources Department. A Human Resources representative will interview the complainant and investigate the complaint in a timely manner and take the appropriate action deemed necessary to resolve the complaint.

Attachment 1.0 - Workplace Barriers

Employment barriers arise both intentionally and unintentionally from practices, policies, attitudes and corporate culture that are neither job-related nor required for the safe and efficient operation of an organization. A policy or practice is a *barrier* when it has a greater negative impact on designated group members than on those who are not members of a designated group. These barriers contribute to hiring and promotion rates that are lower than expected for designated group members in comparison to those who are not members of a designated group. They also manifest themselves in the under-utilization of designated group members and in the concentration of designated group members at the lower levels of an organization and in non-decision making positions. Barriers can be subtle and hard to detect. They frequently result from a lack of awareness of their impact on designated group members.

With respect to the Accessibility of Ontarians with Disabilities Act (AODA) the subject of workplace barriers relates specifically to persons with disabilities.

Examples of workplace barriers include (but are not limited to):

- prejudice or ill-will reflected in deliberately discriminatory actions against persons with disabilities,
- unequal treatment (eg, asking different questions of persons with disabilities applying for the same job as persons who have no disabilities),
- systemic barriers that discourage or block persons with disabilities from employment opportunities (eg, unnecessary experience requirements),
- maintenance of a working environment that is either hostile or abusive toward persons with disabilities or that is simply a non-supportive work culture and environment for persons with disabilities,
- inadequate facilities that present physical barriers to persons with disabilities,
- use of recruitment sources that do not provide an appropriate pool of candidates (eg, advertising, word-of-mouth, networking, employment agencies),
- lack of objective, structured staffing, particularly when coupled with attitude problems,
- unequal access for persons with disabilities to non-advertised promotion, training and development systems, networks and assignments, and
- lack of reasonable accommodation