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POLICY:

El-Con Construction Inc. is committed to treating all individuals in a way that allows them to maintain their dignity and independence. El-Con Construction Inc. values integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. This will be done by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

PURPOSE:

This 2014-19 accessibility plan outlines the policies and actions that El-Con Construction Inc. will put in place to improve opportunities for people with disabilities.

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INTEGRATED ACCESSIBILITY STANDARDS – MULTI YEAR PLAN 2014-2019
Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation .	Develop and maintain policy	Human Resources	Pending <i>Policy drafted and awaiting approval</i>	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its requirements under this Regulation; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years.	a) Identify barriers b) Work with Communications Specialist to post the plan on the El-Con Construction Inc. Website c) Review plan frequently until standards are fully implemented	Human Resources	Pending	January 1, 2014



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7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	<ul style="list-style-type: none"> - Determine method of training – classroom/online - Create training content and complete training for employees, volunteers and other staff members, board members - Consider external trainers – may be more effective in removing attitudinal barriers - Incorporate training into new hire orientation slides and presentation 	Human Resources		January 1, 2015



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PART II – Information and Communications Standards

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	<ul style="list-style-type: none"> - Conduct a review of all feedback processes across El-Con Construction Inc., both internal and external - Determine what feedback to solicit from customer and staff - Ensure multiple options for providing and receiving feedback and notify the public about their availability - Solicit feedback internally and externally and update procedures and plan accordingly 	Human Resources/ Office Manager		January 1, 2015
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person’s accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	<ul style="list-style-type: none"> - Information can and will be provided in an accessible format for both internal and external requests 	Human Resources/ Office Manager	Accessible formats for customer service forms are available upon request.	January 1, 2016



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Section	Initiative	Description	Action	Responsible	Status	Compliance Date
12	Accessible Formats & Communication Supports	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> - Publish statement on website - Place a sign at the Reception counter that all information is available in other formats - Include in phone greeting when the main number is called 	Human Resources/ Office Manager		January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	<ul style="list-style-type: none"> - Provide Emergency Procedures (building evacuation, fire safety plan) to customers in accessible format upon request 			January 1, 2015



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Section	Initiative	Description	Action	Responsible	Status	Compliance Date
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	<ul style="list-style-type: none"> - Talk to IT Department about this action item - Hire consultant if required - New internet websites and web content on those sites must conform with WCAG 2.0 Level A. 	IT/Communications	Pending	January 1, 2015
			<ul style="list-style-type: none"> - All internet websites and web content must conform with WCAG 2.0 Level AA 	IT/Communications	Pending	January 1, 2021



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PART III – Employment

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Send email via ‘all staff’ list, include on the El-Con Construction Inc. ‘Careers’ page and on job postings: <ul style="list-style-type: none"> - El-Con Construction Inc. is committed to providing accommodations for persons with disabilities. - El-Con Construction Inc. is an equal opportunity employer and will provide accommodations for persons with disabilities. 	Human Resources	Pending	January 1, 2016
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall 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.	At every point in the recruitment process (interviews, testing, etc.) <ul style="list-style-type: none"> - When calling on the telephone or emailing, ask applicant if they need accommodation Accommodation request <ul style="list-style-type: none"> - interview room (accessible interview spaces) - testing (case study, computer, etc.) – could allow for more time; on line and they can use own laptop - Develop interview guidelines (script) and train those involved in interviewing 	Human Resources / Office Manager	Pending	January 1, 2016



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Section	Initiative	Description	Action	Responsible	Status	Compliance Date
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<p>Must inform successful candidate that El-Con Construction Inc. has policy for accommodating employees with disabilities</p> <ul style="list-style-type: none"> - Embed in offer letter: El-Con Construction Inc. is committed to providing employees with disabilities with accommodations. More information will be provided during orientation.” 	Human Resources	Pending	January 1, 2016
25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.	<ul style="list-style-type: none"> - Educate existing employees on: Integrated Accessibility Policy, Return to Work Policy & Procedures - Include in Employee Handbook (“contact Human Resources for more information”) - Post policies/updates on Springboard/Intranet 	Human Resources & Environment, Health & Safety	Pending	January 1, 2016
25	Informing Employees of Supports	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> - Include in orientation presentation and process 	Human Resources	Pending	January 1, 2016



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Section	Initiative	Description	Action	Responsible	Status	Compliance Date
25	Informing Employees of Supports	25.(3)Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability.	See 25.(1)	Human Resources	Pending	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee’s job; and (b) information that is generally available to employees in the workplace.	- When an employee with a disability requests an alternative format or communication, consult with him/her regarding the request	Human Resources/ Managers	Pending	January 1, 2016



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26	Accessible Formats & Communication Supports for Employees	26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<p>Manager and Human Resources will consult with the employee regarding their request of the suitability of accessible format. Make a list of things that an employee might request:</p> <ul style="list-style-type: none"> - Policies, procedures, internal events - Accommodations – large print, language versions, audio files, etc. 	Human Resources/ Managers	Pending	January 1, 2016
27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee’s disability.	<ul style="list-style-type: none"> - Communicate to all staff that if someone needs assistance during any emergency situation, s/he should notify Human Resources - Include in orientation presentation and process - This action needs to be documented: <p>“Initiative was communicated with all employees. Individualized plans were made for those employees who responded.”</p>	Human Resources	Pending	January 1, 2015



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27	Workplace Emergency Response Information	(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	<ul style="list-style-type: none"> - If employee makes such request then a meeting should be set up with the Manager and Human Resources to develop the individualized workplace emergency response. - May include: Buddy system designated meeting spot, etc. - Document to employee file 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2015
27	Workplace Emergency Response Information	(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Provide information, review and update as necessary	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2015



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27	Workplace Emergency Response Information	(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	Review and update as necessary.	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2015
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Develop a written process in place of how to develop and document individual accommodations plan. <ul style="list-style-type: none"> - Assign owner to develop process - Training for those involved - Review templates - Define who needs to be consulted "process under review."	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016



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28	Documented Individual Accommodation Plans	<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the 	<ul style="list-style-type: none"> - Review examples - Determine who can draft an accommodation plan, who should be involved and consulted, who is required for this for this process. - Define when is an assessment required? - When do we pay? When does employee pay (if at all) - Occupational Medical Consultant 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016



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<p>28 continu ed</p>		<p>employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <ol style="list-style-type: none"> 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 				
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29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	<ul style="list-style-type: none"> - Current policy & procedure in place - Review to ensure it meets requirements - Include temporary disabilities along with WSIB and insurance company info 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016
29	Return to Work Process	<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	<p>Connection with accommodation plans and RTW process.</p> <ul style="list-style-type: none"> - When do we check in? - When is next evaluation required? 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016
29	Return to Work Process	<p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under</p>		Human Resources/ Manager/ Environment	Pending	January 1, 2016



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30	Performance Management	30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.	<ul style="list-style-type: none"> - Review current performance management processes. Add: "Any individual accommodation plan is considered during the performance management process". 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<ul style="list-style-type: none"> - Review current processes - Consider individual accommodation plans for lateral moves and advancements 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	<ul style="list-style-type: none"> - Review current processes - Consider individual accommodation plans when - moving staff into another area, transfers, etc. 	Human Resources/ Manager/ Environment Health & Safety	Pending	January 1, 2016