



Alumicor Accessibility Standards Policy, Multi Year Plan

Issue Date: Nov. 2017

Revision Date: Dec. 2020

For compliance with Accessibility for Ontarians with Disabilities Act and Accessibility for Manitobans with Disabilities Act

Will be implemented as a best practice across all Alumicor facilities: Ontario, Manitoba, Quebec, Nova Scotia, British Columbia

PART 1 - General Requirements

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of policies, practices and procedures	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.	Policy drafted, reviewed by President and finalized. Posted internally and on Website Workplace inspection (JHSC) to identify barriers.	Completed 14-Dec-2012.	01-Jan-2014 31-Dec-2013

Section	Initiative	Description	Action	Status	Compliance Date
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.	Attended HRPA webinar, met and networking with AODA group and started working on draft. Identifying barriers. Will post final multi year plan on website. HR will review plan periodically and when organizational changes happen and will make changes as needed.	31-Dec-2013 Review Ongoing	1-Jan-2014
	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.	To determine method of training specific for employees and managers. Online provider to be determined. Schedule demo for AccessON training session Schedule employee online training Include in new hire Orientation	Completed New hire orientation updated with AODA training. Selected HR downloads on-line training Initiated employee training 15-Nov-2013. AODA-IASR Training completed in Nov. 22-27, 2017. Orientation training is provided to all employees.	27-Nov-2017
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.	Conduct a review of all feedback processes. Determine accessible formats for communication. Ensure all staff are aware of the need to accommodate upon request and how to do that.	Completed 14-Dec-2012. Fillable PDF feedback document posted on Website and instructions on internal posting.	1-Jan-2015

Section	Initiative	Description	Action	Status	Compliance Date
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.	Will determine what accessible formats & communication supports we will provide to persons with disabilities upon request (w/in 24 hours if not immediately). Communicate information to staff to ensure everyone is aware of available materials/formats.	completed and ongoing. Survey submitted to all employees and discussed with new hires. Customers, as requested.	1-Jan-2016
		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Communicate to staff and management this requirement. Develop protocol for situations where a suitable agreement cannot be made.	Completed and ongoing. Survey submitted to all employees and will be provided to all new hires.	1-Jan-2016
		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Information will be available on our website and provided by the receptionist when requested.	Completed.	1-Jan-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.		Completed	1-Jan-2012

Section	Initiative	Description	Action	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.	All information and documents requested will be available in an accessible format. By January 1, 2021 all internet websites and web content must conform with WCAG 2.0 Level AA, other than: success criteria 1.2.4 Captions (Live); success criteria 1.2.5 Audio Descriptions (Pre-recorded).	Completed	15-Dec-2020
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.	Determine "how". Include statement on website under careers. Example: We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs. Identify where you advertise, paper, website, bulletin board.	ongoing	1-Jan-2016

Section	Initiative	Description	Action	Status	Compliance Date
23	Recruitment, Assessment or Selection Process	<p>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.</p> <p>(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.</p>	<p>Determine "how" to notify applicants – telephone, email, letter</p> <p>May wish to designate a contact person to handle queries regarding accessibility (HR Manager).</p> <p>Identify barriers: location of interview room, format of tests, room set up for in person interview, interviewing timelines, supports, paperwork.</p> <p>Develop interview guidelines.</p>	ongoing	1-Jan-2016
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.	Include sentence in offer letter regarding needs for accessibility.	Completed	1-Jan-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.	Included in employee handbook 1-Oct-2012), printed and distributed to all employees. Manual also posted on Intranet. Stated on our commitment and posted.	Completed	31-Dec-2013

Section	Initiative	Description	Action	Status	Compliance Date
		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Include in new hire orientation. For current employees, provided in on-line training.	completed and ongoing	1-Jan-2016
		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.	Will be communicated through email and internal postings. Intranet and website will be updated as required.	completed and ongoing	1-Jan-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.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing: Jan. 1. 2016. Also surveys sent out in Aug. 2017	Aug. 2017
		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing: Jan	Aug. 2017

Section	Initiative	Description	Action	Status	Compliance Date
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 employee's disability.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	completed and ongoing	1-Jan-2012
		(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.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing	1-Jan-2012
		(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.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing: Jan. 1. 2016. Also surveys sent out in Aug. 2017	Aug. 2017

Section	Initiative	Description	Action	Status	Compliance Date
		<p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.</p>	<p>Completed and ongoing: Jan. 1. 2016. Also surveys sent out in Aug. 2017</p>	<p>Aug. 2017</p>
28	<p>Documented Individual Accommodation Plans (IAP)</p>	<p>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 (IAP) for employees with disabilities.</p>	<p>Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package. Will involve outside party - The Williamson Group to assist in the evaluation of accommodation requests.</p>	<p>Completed and ongoing</p>	<p>1-Jan-2016</p>

Section	Initiative	Description	Action	Status	Compliance Date
	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 employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal. 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. 		Completed and ongoing	1-Jan-2016
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization, (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 (b) shall document the process.</p>	<p>Included in employee handbook (1-Oct-2012), under On the Job Injuries/Illness and Modified or Graduated Return to Work Plan. The manual was printed and distributed to all employees. Manual also posted on Intranet. Memo to employee and physician included in the incident package in the event of a workplace injury.</p>	Completed 14-Dec-2012.	1-Jan-2016

Section	Initiative	Description	Action	Status	Compliance Date
		29. (2) The return to work process shall, (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 (b) use individual documented accommodation plans, as described in section 28, as part of the process.	Included in employee handbook (1-Oct-2012), under On the Job Injuries/Illness and Modified or Graduated Return to Work Plan. The manual was printed and distributed to all employees. Manual also posted on Intranet. Memo to employee and physician included in the incident package in the event of a workplace injury.	Completed 14-Dec-2012.	1-Jan-2016
		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 any other statute.	Included in employee handbook (1-Oct-2012), under On the Job Injuries/Illness and Modified or Graduated Return to Work Plan. The manual was printed and distributed to all employees. Manual also posted on Intranet. Memo to employee and physician included in the incident package in the event of a workplace injury.	Completed 14-Dec-2012.	1-Jan-2016
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.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing: Jan. 1. 2016. Also surveys sent out in Aug. 2017	Aug. 2017

Section	Initiative	Description	Action	Status	Compliance Date
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.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing	1-Jan-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.	Will be done on an as needed basis. Survey completed by all current employees and will include in the new hire package.	Completed and ongoing: Jan. 1. 2016. Also surveys sent out in Aug. 2017	Aug. 2017
MANITOBA					
1	Accessibility for Manitobans with Disabilities	Customer service standards Employment Accessibility standards Information and Communication Built Environment (will only apply to new buildings and major building renovations Transportation does not apply to Alumicor	With the introduction to this act, Alumicor will use AODA compliance requirements as best practices across all facilities in Canada.	As a private sector employee, we do not have to file a report with the Disabilities office in Manitoba.	1-Jan-2018
2	Accessibility workplace audit Winnipeg facility	Assess accessibility for customers, vendors and employees at the Winnipeg facility.	Audit the workplace for accessibility for customers, vendors and employees.	Completed	30-Nov-15

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3	Training	Train all employees on Workplace Accessibility	To determine method of training specific for employees and managers. Online provider to be determined. Schedule demo for AccessON training session Schedule employee online training Include in new hire Orientation	Completed New hire orientation updated with AODA training. Selected HR downloads on-line training Initiated employee training 15-Nov-2013. AODA-IASR Training completed in Nov. 22-27, 2017. Orientation training is provided to all employees.	27-Nov-2017
4	Leadership training	Improving Workplace Accessibility - General Training for Leaders in All Jurisdictions	To determine method of training specific for employees and managers. Online provider to be determined. Schedule demo for AccessON training session Schedule employee online training Include in new hire Orientation	Completed New hire orientation updated with AODA training. Selected HR downloads on-line training Initiated employee training 15-Nov-2013. AODA-IASR Training completed in Nov. 22-27, 2017. Orientation training is provided to all employees.	27-Nov-2017
OTHER FACILITIES					
1	Accessibility across facilities	Assess accessibility for customers, vendors and employees at the Montreal and Halifax facility.	Audit the workplace for accessibility for customers, vendors and employees.	To be determined	

Section	Initiative	Description	Action	Status	Compliance Date
2	Training	Train all employees on Workplace Accessibility LAPHO (French AODA) Training Montreal	<p>To determine method of training specific for employees and managers. Online provider to be determined.</p> <p>Schedule demo for AccessON training session</p> <p>Schedule employee online training</p> <p>Include in new hire Orientation</p>	<p>Completed</p> <p>New hire orientation updated with AODA training.</p> <p>Selected HR downloads on-line training Initiated</p> <p>employee training 15-Nov-2013. AODA-IASR Training completed in Nov. 22-27, 2017.</p> <p>Orientation training is provided to all employees.</p>	27-Nov-2017
3	Leadership training	Improving Workplace Accessibility - General Training for Leaders in All Jurisdictions	<p>To determine method of training specific for employees and managers. Online provider to be determined.</p> <p>Schedule demo for AccessON training session</p> <p>Schedule employee online training</p> <p>Include in new hire Orientation</p>	<p>Completed</p> <p>New hire orientation updated with AODA training.</p> <p>Selected HR downloads on-line training Initiated</p> <p>employee training 15-Nov-2013. AODA-IASR Training completed in Nov. 22-27, 2017.</p> <p>Orientation training is provided to all employees.</p>	1-May-2019