



STRUCTURAL GROUP OF COMPANIES	
TITLE: Accessibility Program	PROCEDURE #: 20.01
PREPARED BY: HR Department	APPROVED BY: R. Volpe; J. Ienco
ISSUE DATE: October 2012	REVIEW FREQUENCY: 1 year

1.0 POLICY STATEMENT

The Structural Group of Companies is committed to excellence in serving all clients and visitors in a way that respects the dignity and independence each individual. We are also committed to giving people with disabilities the same opportunity to access information and services in a similar way as other clients or visitors, by providing reasonable accommodations. We are dedicated to continuous improvement, and will continue to evolve our practices in this regard.

The Structural Group of Companies' success is built on a foundation of professional integrity and a commitment to excellence. We value our employees along with the skills and talents that each individual brings to our organization. We are committed to a safe work environment and we are also committed to creating a workplace that is accessible by removing barriers and making reasonable accommodations, which will allow employees to reach their full potential. Employees with disabilities will be consulted with respect to their individualized accessibility and accommodation needs, and emergency plans will be modified to include any accommodations required.

2.0 TOOLS

- Policy and Procedure Manual
- Accessibility for Ontarians with Disabilities Act (AODA)
- Human Rights Code (HRC)
- Accessibility Standard for Customer Service
- Integrated Access Standard Regulation (IASR)
- Employment Standard

3.0 ACCESSIBLE CUSTOMER SERVICE PLAN

3.01 Providing services to people with disabilities

The Structural Group of Companies is committed to excellence in serving all clients and visitors, including people with disabilities. We will carry out our functions and responsibilities in the following areas:

3.1 Communication

We will communicate with people with disabilities in ways that take into account their disability.

Communication is a process of providing, sending, receiving and understanding information. To communicate in an effective way, The Structural Group will take into consideration how the disability may affect the way the person expresses, receives or processes communications. Where possible, our staff will ask the individual directly the best way to communicate with him/her.

We will train staff who communicate with clients and visitors on how to interact and communicate with people with various types of disabilities.



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A variety of ways will be used, wherever possible, to make communications more accessible by:

- A. Considering the needs of people with disabilities during the planning stage of services and communication development.
- B. Using plain language to make a document easier to read for people with certain learning disabilities.
- C. Offering information in alternate communication methods, upon request:
 - Hand-write or type information back and forth;
 - Large print;
 - E-mail as an alternate channel to provide accessible communication.
 - Relay Service

3.2 Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats, upon request:

- Large print hard copy
- E-mail

We will answer any questions customers may have about the content of the invoice in-person, by telephone, or e-mail.

3.3 Assistive devices

We are committed to serving people with disabilities who use assistive devices. We will ensure that our staff is trained and familiar with various assistive devices that may be used by clients or visitors with disabilities while accessing our services.

3.4 Use of service animals and support persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises open to clients and visitors, in accordance with the visitor policy. We will also ensure that all staff accompanying clients and visitors is properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

3.5 Notice of temporary disruption

Notice will be provided in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances on our premises.



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3.6 Training for staff

The Structural Group of Companies will provide training to all employees who deal with third parties (clients, and visitors), and all those who are involved in the development and approvals of customer service policies, practices and procedures. Individuals in the following positions will be trained:

- Reception
- Managers

Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the Relay Service
- What to do if a person with a disability is having difficulty in accessing our services
- The Structural Group’s policies, practices and procedures relating to the customer service standard.

Applicable staff will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

3.7 Feedback process

The ultimate goal of The Structural Group is to meet and surpass expectations while serving clients and visitors with disabilities. Comments on our services regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way we provide services to people with disabilities can be made by e-mail, verbally, or written correspondence. All feedback will be directed to the Safety Manager and responded to within 14 business days.

3.8 Modifications to this or other policies

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any policy of The Structural Group of Companies that does not respect and promote the dignity and independence of people with disabilities will be modified.

4. INFORMATION AND COMMUNICATION

The Structural Group of Companies is dedicated to ensuring information is accessible for people with disabilities. This will be achieved through the following means:



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- ensuring websites and web content is accessible, according to the World Wide Web Consortium’s Web Content Accessibility Guidelines (WCAG).
- Provide accessible formats and communications supports as quickly as possible at no additional cost, when person with a disability asks for them.
- Make feedback processes accessible by providing accessible formats and communications supports, when requested
- Make public emergency information accessible, when requested

5. EMERGENCY PLANNING

The Structural Group will prepare for the specific needs that employees with disabilities may have in emergency situations.

Upon notification of the need for accommodation due to an employee’s disability, we will provide individualized emergency response information to employees with disabilities, when necessary. Emergency plans will be modified to include any accommodations required.

With the employee’s consent, the workplace emergency response information will be provided to the person designated to assist the employee.

The Structural Group will review the individualized workplace emergency response information:

- When the employee moves to a different location within the organization
- When the employee’s overall accommodation needs or plans are reviewed, or
- when the general emergency response policies are reviewed

5.1 When to Provide Individual Workplace Emergency Response Information

There are several ways that The Structural Group may be made aware of the need to provide individualized workplace emergency response information:

- A new employee may have requested accommodations during the recruitment process.
- Existing employees tell their employers that they have a disability. (For example, an existing employee who develops vision loss and requests screen reader software for his/her computer)
- An existing employee develops a temporary disability (ie. an injury such as a broken leg)

The Structural Group may initiate dialogue to offer assistance and accommodation to an employee who is perceived to have a disability.

5.2 Developing Individual Workplace Emergency Response Information

The Structural Group will consult with employees who have disabilities, so that the individualized workplace emergency response information meets the employees’ needs.

It is important to recognize how an individual’s disability, as well as the physical nature of the workplace, may create unique challenges in emergency situations.



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For example:

- A worker with a hearing disability may not hear an audible alarm for evacuation, and may need to be notified by other means, such as a visual alarm with flashing lights
- An employee with a visual disability may be unable to identify the escape routes, or obstructions to the escape routes and may need guidance toward the exit and meeting area
- A worker with a broken leg may require assistance during an emergency evacuation of the building.

5.3 When an Employee Needs Assistance

Employees with disabilities may require assistance when evacuating the workplace in emergencies.

In these cases, and with the employees consent, The Structural Group will provide the employees' individualized workplace emergency response information to the designated individual(s). However, we will respect our employees' privacy. For co-workers to provide assistance, they do not need to know the details of the employees' disabilities.

For example, an employee with limited mobility may need assistance walking down stairs. The person designated to help only needs to know the individual requires help walking down stairs. In other words, it is important to not include personal medical information in the individualized workplace emergency response information.

5.4 Documenting Individualized Workplace Emergency Response Information

If an employee has an individual accommodation plan, then the individualized workplace emergency response information provided to the employee should be included in the plan.

6. EMPLOYMENT

The Structural Group of Companies' success is built on a foundation of professional integrity and a commitment to excellence. We value our employees along with the skills and talents that each individual brings to our organization. We are committed to a safe work environment and we are also committed to creating a workplace that is accessible by removing barriers and making reasonable accommodations, which will allow employees to reach their full potential. Employees with disabilities will be consulted with respect to their individualized accessibility and accommodation needs, and emergency plans will be modified to include any accommodations required.

This commitment applies to all paid employees including full-time, part-time, paid apprenticeships, and seasonal employment.

6.1 Recruitment

The Structural Group will notify job applicants that where needed, accommodations for disabilities will be provided, on request, to support their participation in the recruitment process.



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During the recruitment process, The Structural Group will 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. If a selected applicant requests an accommodation, The Structural Group will consult with the applicant and arrange to provide the suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

The Structural Group will incorporate a variety of ways to make the recruitment process accessible:

- Job Advertisements
- Clearly stating that The Structural Group is an equal opportunity employer.
- Using a simple typeface that is easy and large enough to read, and the use of plain language.
- Consideration of alternate formats of advertising such as web-based listings
- Using an employment agency in the community
- Focusing on skills, abilities, expectations and desired outcomes.

6.1.1 Recruitment and Selection

The selection process for all applicants will be consistent, including interviews, tests and other screening tools.

When contacting candidates for an interview, The Structural Group will ask if they have any accommodation needs for the interview. (For example, they may need materials provided in large high-contrast print)

Staff greeting job candidates will be trained on how to interact with people with disabilities.

Questions asked will be related to the job or job task. If the job requires specific physical demands, such as heavy lifting, questions may be asked about the candidate's physical ability to perform the task.

6.1.2 Applicant Testing

All candidates will be asked if they need any accommodations for the interview and any related tests ahead of time. (For example, you may have to give the test verbally, or provide a larger font test, or provide a computer for candidates to do the test.)

The same test and clear instructions will be given to all candidates. Testing methods and requirements will be established according to the specific job.

6.2 Notice to Successful Applicants

When making an offer of employment, the successful applicant will be notified of The Structural Group's policies for accommodating employees with disabilities.

6.3 Informing Employees of Supports

The Structural Group will inform all new and existing employees of its policies used to support employees with disabilities, including job accommodations that take into account an employee's accessibility needs due to disabilities.



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All new hires will be provided with this information during the orientation process, as soon as practicable after their hire date.

Updated information will be provided to all employees whenever there is a change to existing policies relating to job accommodations that take into consideration accessibility needs due to disability.

The policy information may be communicated in a variety of ways:

- Newsletters
- Emails
- Staff memos
- Staff meetings

6.4 Accessible Formats and Communication Supports for Employees

On request, The Structural Group will consult with their employees who have disabilities in order to provide them with the accessible formats and communication supports they require to do their jobs effectively and to be informed of information that is generally available to all employees in the workplace.

The Structural Group will consult with the employee making the request to determine the suitability of an accessible format or communication support. Accommodations will depend on the needs of the individual.

This requirement also applies to company newsletters, bulletins on company policies and procedures, fact sheets, health and safety information, and inter-office memorandums. There may be a variety of formats that may be provided, including:

- Printed material
- Email
- Staff notice boards
- Verbally

6.4.1 Documenting Accessible Formats and Communication Supports

If an employee has an individual accommodation plan, then the accessible formats and/or communications supports that will be provided to the employee should be included in the plan.

Refer to the section below regarding accommodation plans.

7. DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS

The Structural Group is committed to provide a safe work environment for our employees, and we are also committed to creating a workplace that is accessible by removing barriers and making reasonable accommodations which will allow employees to reach their full potential.

Employees with disabilities will be consulted with respect to their individual accessibility and accommodation needs. Any individual accommodation plan to be implemented will be fully documented in writing.



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Please refer to the *Incident Reporting and Investigation Procedure* and *Return to Work* policy and procedure outlining the protocol involved in the return to work and accommodation of injured workers. Transitional Work Plan forms are used to document a worker's modified work program and accommodations to be implemented in the workplace.

7.1 Developing Individual Accommodation Plans

Each employee who has a disability will be assessed on an individual basis, to determine their accessibility and accommodation needs.

If clarification of the employee's functional capacity is required, The Structural Group will request that the worker obtain medical documentation outlining the worker's functional abilities and limitations. The Structural Group may request that the employee attend a medical assessment by an outside medical provider or expert, at the expense of the company, to clarify their functional capacity and the worker's accommodation needs.

Employees with disabilities will be consulted, when developing an individual accommodation plan.

Employees may request participation of a Worker Health and Safety Representative or Union Representative in the development of the accommodation plan.

The Structural Group respects our employees' privacy. Personal information will be used for the purpose for which it has been collected and will not be disclosed to any other party, unless consent has been obtained from the individual or as required by law.

Accommodation plans will be reviewed and updated:

- When the worker changes job positions, or moves to a different location
- When the employee's accommodation needs change
- When there is a change to the company's policies, practices, or processes

If the individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.

A copy of the individual accommodation plan will be provided to the employee in a format that takes into account the employee's disability needs due to disability. The plan will include:

- any information regarding accessible formats and communications supports provided,
- any individualized workplace emergency response information, and
- identify any other accommodation that is to be provided



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8.0 PROGRAM REVIEW

This procedure is to be reviewed on an annual basis to ensure it remains current with the “best practices” of the industry.

REVISION DATE	APPROVED BY	CHANGES MADE
November 14, 2017	Megan Adams	Updated layout
November 14, 2017	Megan Adams	Included Tools to reference legislative requirements, updated 1.0 policy statement to include 6. Employment Policy statement Added Form 20.1 Individualized Accommodation Plan, and 20.2 ADOA Training document
February 1 2018	M Adams	Remove reference to Injury Management Program, change Modified Work policy to Return to Work policy; update form numbers for Incident Reporting Package
December 2019	E. Bishop	Updated Formatting. Removed Revision # from footer. Fixed section numbers

9.0 ATTACHMENTS

The following forms apply to this document:

Program 20.0 Accessibility Program:

- FORM 20.1 Individualized Accommodation Plan
- FORM 20.2 AODA Training document

Program 12.01 Return to Work Program:

- FORM 12.1 Physical Guidelines Form
- FORM 12.2 Consent to Release of Medical Information

Program 10.01 Incident Reporting and Investigation Program:

- Incident Report Package:
 - FORM 10.0 INCIDENT REPORT PACKAGE and PROCEDURE
 - FORM 10.1 Incident Report – Worker
 - FORM 10.2 Medical Treatment Memorandum
 - FORM 10.2.1 Modified Work Offer Letter to Worker
 - FORM 10.3 Transitional Work Plan Form
 - FORM 10.4 Incident Investigation Report
 - FORM 10.5 Incident Report – Witness
- WSIB Forms:
 - WSIB Functional Abilities Form