

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA) POLICY**

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## **ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES – AODA**

### **OBJECTIVE**

Sykes Assistance Services Corporation (SASC) is committed to and bound by applicable provincial legislation including, but not limited to, the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is a bill passed by the Ontario legislature. This bill consists of 5 different standards which are being targeted in stages. These standards are as follows:

- Customer Service
- Information and Communication
- Employment
- Transportation
- Building environment

The Customer Service Standard stands alone and the remaining four Standards - Employment, Information and Communication, Transportation, and Building Environment - constitute the Integrated Accessibility Standards Regulation (IASR).

The purpose of the AODA is to achieve a fully accessible province of Ontario by 2025, by developing, implementing and enforcing accessibility standards with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. At the same time, under the AODA, organizations are required to develop policies, plans, and procedures to provide accessibility which covers general topics and specific requirements. These accessibility standards apply to all organizations in Ontario that provide goods and services and/or employ Ontarians.

This policy is made pursuant to the AODA and will be amended as necessary to include new regulation requirements as they come into effect to ensure ongoing compliance with the Act and applicable regulations.

### **POLICY**

SASC is committed to meet the accessibility needs of persons with disabilities in a timely manner in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) under the parameters outlined in the Customer Services Standard and the IASR.

Accommodating the needs of persons with disabilities is based on the principles outlined in the AODA which include dignity, independence, integration, and equality. These principles will be the pillar for SASC when delivering customer service as well as through any interaction that SASC undertakes with employees, customers and/or clients with disabilities.

SASC is committed to offer the use of alternate measures that take into account an individual's disability, so that all employees, customers and clients with disabilities can receive full benefit from the company's services at all times. Management is also committed to identifying and eliminating barriers that can prevent accessibility to information and communication, and employment on an ongoing basis.

## RELATED POLICIES / DOCUMENTS

Located under Sharepoint/Human Resources/All SASC Library/Policies and Procedures:

- Accommodating Disability policy.
- Hiring policy.
- Workforce Reduction policy.
- Development Review policy.

Located under Sharepoint/Human Resources/Managing Abilities in the Workplace:

- Managing Abilities in the Workplace document.

Located under Sharepoint/Human Resources/Accessibility for Ontarians with Disabilities Act / Integrated Accessibility Standard Regulation:

- Individualized Workplace Emergency Response Plan (IWERP) document.
- SASC Multiyear Accessibility Plan document.
- Accessible Document Guidelines.

## DEFINITIONS

### Accessible Formats

Formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats may include large print, Braille, and audio electronic formats such as DVDs and CDs.

### Clients

Companies that contract with SASC.

### Communication Supports

Supports that individuals with disabilities may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate.

### Customers

Those who buy products or services from SASC clients.

### Dignity

Policies, procedures and practices that respect the dignity of a person with a disability are those that treat them as customers and clients valued and deserving of effective and complete service as any other customer/client. Persons with disabilities are not treated as an afterthought, nor are they forced to accept lesser service, quality or convenience.

### Disability

- (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 co-ordination, 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, 1997*; (“handicap”)

### **Equal Opportunity**

Equal opportunity means having the same chances, options, benefits and results as others. In the case of services it means that persons with disabilities have the same opportunity to benefit from the way goods or services are provided as they are provided to others.

### **Independence**

Freedom from control or influence of others – freedom to make your own choices. In some situations, it may mean the freedom to do things your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor. A staff person should not hurry them or take over a task for them if they prefer to do it themselves in their own way.

### **Integration**

Integrated services are those that allow persons with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, practices and procedures are designed to be accessible to everyone including persons with disabilities. There may be times when integration does not serve the needs of all persons with disabilities; in these cases, it will be necessary to use alternate measures to provide goods or services.

### **Timely Manner**

The timeframe should be negotiated with the requestor. Timeliness can be dependent upon a number of factors including:

- Amount of information
- Complexity of information
- Type of information requested
- Organizational Capability
- Urgency of information

## **TRAINING**

SASC is committed to provide training to all its employees, and third party contractors on the requirements set out in this policy and specifically:

- The principles set out in the Accessibility for Ontarians with Disabilities Act, 2005, the Accessibility Standards for Customer Service Regulation as well as the Integrated Accessibility Standards Regulation.
- How to interact and communicate with persons with various types of disabilities.
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- How to use the TTY systems and/or Relay Services, and/or any other technological aids that are offered in accordance to the clients requirements.
- What to do if a person with a disability is having difficulties in accessing SASC services or premises open to the public.
- SASC policies, practices, and procedures relating to the AODA and all its standards.
- IASR and the Human Right Code.

The training will be provided within the first 2 weeks of the initiation of employment for salaried employees and during training for registered and non registered front line staff. Third party contractors will have the training provided once the contract has been signed.

SASC will collect training acknowledgments to evidence training for employees as well as contractors.

Training will be provided on an ongoing basis in respect to any changes to the policies, practices, and procedures relating to the IASR as it relates to the duties of employees and contractors.

Specialized training will be determined at the Departmental level as the need may arise in order to support the ongoing AODA requirements.

## **COMPLIANCE**

### **Filing Accessibility Reports**

Sykes Assistance Services Corporation is required to file annual Accessibility Reports outlining the organization's progress towards becoming accessible for people with disabilities. In addition, the company may be required to submit compliance-related information or other reports upon request and may be subjected to compliance audits or inspections.

### **Penalties for Non-compliance**

The Accessibility for Ontarians with Disabilities Act (AODA) allows for severe maximum monetary penalties for any violation to the Act. The maximum penalties under the AODA include:

- A person and unincorporated organizations that are guilty of a major offence under this Act can be fined up to \$50,000 dollars for each day the violation continues
- A corporation that is guilty can be fined up to \$100,000 per day
- Directors and officers of a corporation with fiduciary responsibility who are guilty are liable to a fine of up to \$50,000 a day

## **ROLES & RESPONSIBILITIES**

### **Employee responsibilities**

- Complete required training.
- Comply with the Customer Service Standard and IASR as outlined in policy and training.
- Seek guidance from manager if questions arise regarding the Customer Service Standard and IASR.
- Forward AODA complaints to the manager on duty. If there is not a manager on duty at the time of the call, take the information on behalf of the caller, and forward the information to the manager for follow up.
- Advise manager if an IWERP is required.

### **Employer responsibilities**

- Provide training to staff and third party contractors in regard to the AODA and IASR, and obtain training acknowledgment forms.

- Identify and eliminate barriers that could prevent accessibility to customer service, information, communication, and employment.
- Respond to any complaints as per the guidelines provided in this policy.
- Provide notice of disruption of service to customers/clients.
- Provide an IWERP upon the request of the employee with the disability.
- Ensure that an alternative method of communication is provided when dealing with persons with disabilities, if the existing provisions do not take into consideration a person's disability.
- Ensure that any new or existing website is in compliance as per the parameters established in the Web Content Accessibility Guidelines (WCAG).
- Ensure that the accessibility needs of employees with disabilities during the work life cycle are met as per the Employment Standard requirements.

### **Immediate supervisor responsibilities**

- Identify and eliminate barriers that could prevent accessibility to customer service, information, communication, and employment.
- Ensure that an alternative method of communication is provided when dealing with persons with disabilities, if the existing provisions do not take into consideration a person's disability.
- Provide notice of disruption of service to the appropriate Director, Client Relations for the Division that is being affected with the disruption.
- Record any complaints in the AODA Complaint Reporting Form located under: Sharepoint/Human Resources/All SASC Library/Accessibility for Ontarians with Disabilities / Integrated Accessibility Standard Regulation, and submit to Human Resources at [calon-hradmin@sykes.com](mailto:calon-hradmin@sykes.com) within 24 hours of receipt of complaint.
- Respond to any complaints as per the guidelines provided in this policy.
- Ensure employees are in compliance with training under the AODA - Customer Service Standard and IASR.
- Consult with the employee making the request in determining the suitability of an accessible format or communication support.
- Identify employees on their team that may require an IWERP.
- Provide an IWERP upon the request of an employee with the disability.
- Monitor the IWERP and revise as necessary.

## **CUSTOMER SERVICE STANDARD**

### **GUIDELINES**

#### **Providing Services to Persons with Disabilities**

SASC will communicate with persons with disabilities in ways that take into account their individual needs, using clear and plain language and alternative forms of non-verbal communication as appropriate and available. Considering the nature of SASC's business, the following options may be available for persons with disabilities (dependant on the client):

- Membership materials available in large print
- TTY telephone system or Relay Services
- Live chat support
- Websites ([www.roadsideaid.com](http://www.roadsideaid.com))

In addition, SASC will consider any other options presented by clients or customers should the above not be satisfactory to accommodate individual needs.

#### **Personal Assistive Devices**

SASC is committed to allow persons with disabilities, to use, at all times, any assistive device. Assistive devices include, but are not limited to the following: cognitive aids; mobility aids such as wheelchairs, walkers, scooters, white canes; communication aids such as hearing aids, communication boards, speech generating devices or any other personal assistive device required when communicating to obtain, use, or benefit from our services. SASC will provide accessible customer service regardless of the person's disability.

#### **Service Animals**

Unless otherwise excluded by law, SASC is committed to allow guide dogs or other service animals to accompany persons with disabilities on the premises that are open to the public. Customers, clients or visitors that require a meeting with a staff member on SASC premises are encouraged to advise in advance, so the staff member can make the appropriate arrangements such as booking a meeting room for this purpose.

Where such notice could not be provided, the staff member will advise those who will be sharing the same physical space with the support animal, so other measures can be taken to avoid triggering allergic reactions to persons who may be sensitive to animal dander.

Where excluded by law or for other health and safety reasons, the service animal is prohibited from the premises that are open to the public; SASC will ensure that other methods of access are available to ensure accessibility.

For purposes of this policy, an animal is a "service animal": if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability. A service animal includes a guide dog as that term is defined in the *Blind Persons' Right Act*.

#### **Support Persons**

SASC is committed to allow persons with disabilities to be accompanied by a support person, on the premises that are open to the public or third parties. It is assumed that the support person is necessary to



protect the health or safety of the person with a disability or to assist with communication on behalf of the person with the disability.

For purposes of this policy, a “support person” is, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

### **Temporary Disruption of Service**

In the case of a temporary disruption, in whole or in part, to any services that may be used by persons with disabilities, SASC will notify clients/customers affected by the disruption providing the reason for it, its duration, and a description of alternative ways services will be provided, if they are available. This notice can be provided by using one or a combination of the following methods:

- Posting notice at affected SASC’s facilities
- Reception counter (where the site has one)
- SASC’s website
- Prerecorded message in each line of business that is affected by the disruption
- Any other physical or technological method that serves to notify customers/clients of a disruption in the services usually used by persons with disabilities.

SASC will notify the client that is being affected by the disruption, so the client can notify its customers as per its policies.

In the event of an unexpected disruption of services, SASC will make every effort to remedy the disruption as soon as possible.

### **Feedback**

The methods described in the *Accessibility Feedback Processes* under the “Information and Communications Standard Requirement” (page.10) apply under this section.

### **Complaint Resolution**

SASC is committed to acknowledge all complaints that may arise in providing services to persons with disabilities within 5 business days of receipt. Human Resources will follow up with the appropriate departmental Director or Vice President to ensure that a resolution is implemented within a reasonable time frame (based on the complexity of the resolution). SASC will notify the person who submitted the complaint, and will inform of the action plan to be undertaken.

If a complaint is received via telephone, the employee will forward the call to the manager on duty. If there is no manager on duty, the employee will ask the caller if a manager can return their call, and ask them to provide the best way for them to be reached. This information will be forwarded to the manager for a call back as soon as possible. The manager will complete the AODA Complaint Reporting Form and forward it to the Human Resources Department within 24 hours of receipt of the complaint. The AODA Complaint Reporting Form is located under: SASC Sharepoint/Human Resources/ Accessibility for Ontarians with Disabilities Act/Integrated Accessibility Standard Regulation /AODA Complaint Reporting form.

### **Document Requirements**

SASC will notify the public that the documents required under the Accessibility for Ontarians with Disabilities Act, 2005 are available upon request by publishing a notice on the SASC website and by communicating this to its clients via email. A copy of this policy can be given to any person who requests it and its format can be agreed upon taking into consideration a person’s disability.



## **INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)**

### **GUIDELINES**

The Integrated Accessibility Standards Regulation (IASR) has been created as part of the Accessibility for Ontarians with Disabilities Act. These standards establish accessibility standards and requirements for Information and Communication, Employment, Transportation as well as Building Environment. The IASR also establishes the compliance framework for organizations.

As with the Customer Service Standard, the intent of the regulation is to provide organizations with rules to follow to identify, remove and prevent barriers so that people with disabilities have more opportunities to participate in everyday life.

As the Transportation Services Standard applies specifically to organizations providing transportation services, and the Building Environment Standard is not yet law, this policy only addresses the Information and Communications Standard as well as the Employment Standard.

The IASR section of the policy addresses standards and regulations where compliance is already required or will be required in the near future. Updates will be ongoing as requirements come in to effect. Please refer to SASC's Accessibility Plan for a long term view of the accessibility requirements.

The Ontario Human Rights Code requires organizations to accommodate people with disabilities to the point of undue hardship. The IASR does not replace or affect the legal rights or obligations that arise under the Human Rights Code. This means that there may be additional requirements not outlined in the IASR or in this policy that must still be considered under other applicable legislation and/or outlined in other SASC policies and procedures. Please refer to the "Related Policies and Procedures" section (p.3).

### **PART I**

#### **GENERAL REQUIREMENTS**

The General Requirements provide the framework that SASC has used to establish the company's accessibility strategy and goals that apply across the applicable standards: Information & Communications Standard and Employment Standard.

#### **Accessibility Plan**

Sykes Assistance Services Corporation has developed a Multi-Year Accessibility Plan, outlining strategies to prevent and remove barriers for people with disabilities taking in to account the legislative requirements and timelines for the phased in standards.

The Accessibility Plan is posted on the SASC website and can also be viewed internally at: Sharepoint/Human Resources/Accessibility for Ontarians with Disabilities Act/Integrated Accessibility Standard Regulation/SASC Multiyear Accessibility Plan.

The Accessibility plan shall be reviewed at least once every five years and can be provided in an accessible format upon request.

## PART II

### INFORMATION AND COMMUNICATIONS STANDARD

The Information and Communications Standard outlines requirements for organizations to create, provide and receive information and communications in ways that are accessible for people with disabilities. The Standard specifically addresses the following:

#### Accessible Feedback Processes

SASC is open to receive feedback and welcomes any questions, suggestions, comments, or ideas that help to enhance the way services are delivered to persons with disabilities.

At any time, customers/clients can provide feedback regarding the way SASC provides services to persons with disabilities by using any of the following methods:

- In person, at the Reception area (where the site has one).
- By telephone (519) 434-3221 Ext. 3231 or Relay Service 1-800-855-0511.
- By email at [CALON-accessibility@sykes.com](mailto:CALON-accessibility@sykes.com)
- By mail addressed to the attention of Human Resources (248 Pall Mall Street, London, ON N6A 4T4)
- By any other means that takes into account a person's disability, as requested.

#### Accessible Formats and Communication Supports

SASC will notify the public that accessible formats to standard print are available upon request by publishing a notice on SASC's website and by communicating this to its clients via email. This pertains only to information and communications that SASC controls directly or indirectly through contractual relationships. It does not apply to information that SASC provides or shares on behalf of its Clients.

A copy of this policy and any related forms can be given to any person in a timely manner, who requests it and its format can be agreed upon taking into consideration a person's disability.

Access to the company's policies and procedures including emergency evacuation and safety procedures, and forms can be agreed upon taking into consideration a person's disability as well as protecting the company's right to proprietary information.

#### Accessible Websites and Web Content

SASC is committed to making its public facing websites accessible to people with disabilities by conforming to international standards for website accessibility. Any new internet websites and web content of those sites developed after January 1, 2012 conform with WCAG 2.0 Level A.

A new website refers to a site with a new domain name – a brand new web address. The term does not refer to a new page or new link on an existing site.

The term also refers to a site with an existing domain name that is undergoing a significant "refresh". There is not an industry standard definition for significant "refresh". In this context, it could include but not limited to the following elements:

- A new look and feel to the website
- A change in how users navigate around it
- A major update and change to the content of the website

Content may include any information that may be found on a web page or web application, including text, images, forms and sounds.

Content published on a website prior to January 1, 2012 is not required to be compliant with WCAG 2.0. However, people with disabilities can still request information to be provided in an accessible format under the 'Accessible Formats and Communication Supports' requirement.

The regulation has staggered timelines which allows SASC to build accessibility into the company's infrastructure planning on an ongoing basis.

### **PART III**

#### **EMPLOYMENT STANDARD**

The Employment Standard under the Integrated Accessibility Standards Regulation requires employers to provide for accessibility across the employment life cycle. It applies to paid employees only, including full-time, part-time and casual. It does not apply to volunteers or other non-paid individuals. The requirements covered under this Standard include the following:

- Recruitment, assessment and selection
- Notice to successful applicants and informing employees of supports
- Accessible formats and communication supports
- Workplace Emergency Response Information
- Documented individual accommodation plans
- Return to work process
- Performance management, career development and advancement
- Redeployment

SASC policies and procedures support the intent of the Employment Standard to build an inclusive and accessible work environment which enables employees to participate fully.

#### **Recruitment, Assessment and Selection**

SASC is committed to notify applicants about the availability of accommodations for disabilities, where needed, to support their participation in the recruitment processes in both the job posting as well as the recruitment portal. SASC is committed to providing the same internal employment opportunities to employees with disabilities. Support will be made available during the recruitment process to applicants with disabilities, including accommodation that takes into account an applicant's accessibility needs.

Please also reference the Hiring policy, located in Sharepoint/ Human Resources / Policies and Procedures.

#### **Notice to successful applicants and informing employees of supports**

SASC shall inform each successful candidate, of its policies, processes, and programs for accommodating employees with disabilities. This will be communicated to employees following the schedule outlined under the Training section of this policy (please refer to page 4) as well as in the offer of employment letter.

### **Accessible Formats and Communications Support**

SASC is committed to provide, where an employee with a disability requests it, accessible formats and communications support for:

- Information that is needed in order for an employee to perform their job; and
- Information that is generally available for employees in the workplace.

SASC will consult with the employee in determining the suitability of an accessible format or communication support.

Please refer to the Accessible Formats and Communication Support section under Part II, Information and Communications Standard of this policy (page 10) and the Accessible Documents Guidelines, located in Sharepoint/Human Resources/Accessibility for Ontarians with Disabilities /Integrated Accessibility Standard Regulation.

### **Workplace Emergency Response Information**

SASC is committed to provide individualized workplace emergency response information plans (IWERP) to employees who have a disability, if the disability is such that the individualized information is necessary and the company is aware of the need for accommodation due to the employee's disability. An IWERP may be required to provide employees with disabilities with the necessary support in the event of an emergency evacuation. The manager will work with the employee to develop and document the plan.

SASC will provide information related to the IWERP to the person designated to provide assistance to the employee with a disability, only if the employee who receives the IWERP requires assistance and provides consent.

SASC will review the IWERP when:

- The employee is changing work locations or managers.
- The designated emergency support staff is no longer part of the IWERP.
- A change occurs in the Site Policy addressing emergency evacuation that might affect the established emergency response plan for the individual.
- The designated accommodation and/or IWERP review date.

Please also reference the Individualized Workplace Emergency Response Plan (IWERP) document, located under Sharepoint/Human Resources/Accessibility for Ontarians with Disabilities Act/Integrated Accessibility Standard Regulation and the Evacuation procedures by site, located under Sharepoint/JHSC/OHS.

### **Documented Individual Accommodation Plans and Return to Work**

SASC is committed for the development and maintenance of documented individual accommodation plans. The Managing Abilities in the Workplace (MAWP) program outlines the roadmap to assist managers and employees on establishing measures regarding accommodations, attendance support, medical leaves of absence, and return to work through job aids. The MAWP's framework addresses the related requirements under the Employment Standard.

Please also reference the MAWP documents, located under Sharepoint/Human Resources/Managing Abilities in the Workplace and the Accommodating Disability policy located under Sharepoint/Human Resources/Policies and Procedures.

### **Performance Management, Career Development and Advancement**

SASC is committed to provide the same opportunities to employees with disabilities with regard to career development and advancement, as it provides to all employees. This means that when opportunities for advancement and/or development are presented, a person's disability, and/or individualized accommodation plan is taken into consideration, to ensure that equal opportunity is presented in the organization to people with disabilities.

Please also reference the Hiring policy and Development Review policy, located under Sharepoint/Human Resources/Policies and Procedures.

### **Redeployment**

SASC is committed to provide accommodations to employees with disabilities who have been redeployed to ensure such individualized accommodation plan meets their needs in their new role in the cases where redeployment is warranted.

Please also reference the Workforce Reduction Policy, located under: Sharepoint/Human Resources/Policies and Procedures.