

# Accessibility Policy

HS-010-HSA



**COLOUR**  
INNOVATIONS

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## Attachments

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**Individual Accommodation Plan**  
**Return to Work Plan**

## 1 Accessibility Policy Purpose

The following policy has been established by Colour Innovations Inc. and Raining Creative Inc. (the Company) to govern the provision of services with Regulation 191/11, “Integrated Accessibility Standards” under the Accessibility for Ontarians with Disabilities Act, 2005.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

The Company is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

## 2 Commitment

The Company is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

This policy will be implemented in accordance with the periods established by the Regulation.

## 3 Definition of Disability

The definition of a Disability as applicable under the Accessibility for Ontarians with a Disability Act may be found in the Ontario Human Rights Code. This is a condensed definition:

- Any degree of physical infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness,
- A condition of mental impairment or disorder, a developmental or learning dysfunction

The Company will do its best to ensure the following individuals have same access to our information, work place accessibility, and facilities:

- People with physical/mobility disabilities
- People with vision loss
- People with hearing loss
- People with a support person
- People with speech or language disabilities
- People who are deafblind

- People who have learning disabilities
- People who have developmental disabilities
- People who have mental health disabilities
- People who use assistive devices
- People who use service animals
- People accessing goods, services or facilities

## **4 Accessibility Plan**

The Company has developed and will maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every 5-years and will be posted on the Company's website.

### **4.1 Training Employees and Volunteers**

The Company will ensure that training is provided on the requirements of the accessibility standards and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- All its employees and volunteers
- All persons who participate in developing the Company's policies;
- All other persons who provide goods, services or facilities on behalf of the company

The training will be appropriate to the duties of the employees.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained during the orientation process.

## **5 Information and Communications Standards**

### **5.1 Feedback**

The Company will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

### **5.2 Accessible Formats and Communication Supports**

Upon request, the Company will provide, or will arrange for, the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

The Company will consult with the person making the request in determining the suitability of an accessible format or communication support.

### **5.3 Accessible Websites and Web Content**

The Company will ensure that the Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

## **6 Employment Standards**

### **6.1 Recruitment**

The Company will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### **6.2 Recruitment, Assessment or Selection Process**

The Company is committed to ensuring that people with disabilities have the same opportunity of access to employment opportunities as all prospective employees and employees. The company will ensure that in its recruitment practices the public is made aware that it will provide accommodation for applicants with disabilities in its recruitment, assessment, and selection processes.

When the Company selects job applicants for a job selection process, the Company will make applicants aware that, upon request, they have access to accommodation in relation to materials and processes that will be used for applicant selection and that take into account their accessibility needs due to a disability.

### **6.3 Notice to Successful Applicants**

Upon an offer of employment, the Company will notify the successful applicant of HS-010-HSA policy of accommodating employees with disabilities.

### **6.4 Informing Employees of Supports**

The Company will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

### **6.5 Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, the Company will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

### **6.6 Workplace Emergency Response Information**

The Company will 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. The Company will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, the Company will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Company to provide assistance to the employee.

The Company will review the individualized workplace emergency response information when the employee moves to a different location in the organization. The Company and the employee will review the overall workplace emergency response information, accommodations needs or plans.

## 6.7 Documented Individual Accommodation Plans

The Company will maintain a written process for the development of documented individual Accommodation Plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual Accommodation Plans.

In addition, the plan will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

### Accommodation Process Template

The Company is committed to adhering to O. Reg. 191/11, s. 28 (1) and as such will provide a written process for the development of documented individual Accommodation Plans for employees with disabilities. The Company will perform the following steps in completing an Accommodations Process Plan for an employee upon request by the employee:

#### ***Step 1: Recognize the Need for Accommodation***

The need for accommodation can be:

- Requested by the employee through his/her supervisor, or human resources
- Identified by the employee's manager or the hiring manager

#### ***Step 2: Gather Relevant Information and Assess Needs - the employee is an active participant in this step***

The Company does not require details on the nature of the employee's disability to provide an accommodation; it only needs to know about the employee's abilities.

- The manager may ask for a Functional Capacity Assessment at the organization's expense
- The employee and his/her manager evaluate potential options to find the most appropriate measure
- An external expert may be involved, at the organization's expense
- The employee's personal information will be protected at all times

The employee can request the participation of a representative from his/her bargaining agent. If there is no bargaining agent, someone from the workplace can be a representative.



### ***Step 3: Write a Formal, Individual Accommodation Plan***

Once the most appropriate accommodation has been identified, the accommodation details are written down in a formal plan, including:

- What accommodation(s) will be provided
- How to make information accessible to the employee, including accessible formats and communication supports, if requested
- Workplace emergency response information, if required
- Any other accommodation that is to be provided

If the employer denies an accommodation, ensure that the employee knows the reasons for the denial.

### ***Step 4: Implement, Monitor, and Review Accommodation Plan***

The employee and his or her manager will monitor the accommodation to ensure that it has effectively resolved the challenge.

- Formal reviews happen according to a regular schedule agreed upon with the employee and manager
- The Accommodation Plan is reviewed if the employee's work location or position changes
- The accommodation is reviewed if the nature of the employee's disability changes

If the accommodation is no longer appropriate, the employee and the manager can work together to gather information and reassess the employee's needs in order for the Company to find the best accommodation measure (Step 2).

### ***Step 5: Outside Medical Evaluation***

In the event that the employee's Accommodation Plan does not seem to be relevant or meet the employee's disabilities, then an outside medical or other expert can assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.

### ***Step 6: Availability of Documentation***

The individual Accommodation Plan can be provided in any format deemed fit for the employee upon request. Further, emergency evacuation processes will be reviewed and revised based on the employee's disability and provided to the employee upon request.

## **6.8 Return to Work Process**

The Company maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps the Company will take to facilitate the return to work and will include documented individual Accommodation Plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e. the Workplace Safety Insurance Act, 1997).

## **6.9 Performance Management, Career Development and Advancement & Redeployment**

The Company will take into account the accessibility needs of employees with disabilities, as well as individual Accommodation Plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

## **6.10 Access to Goods and Services**

The Company has a fully accessibility facility with dedicated Disabled Parking spot, ramp, and flat surfaces throughout. The only section of the Company that is not accessible due to stairways is the secure room. In the event that an individual who has restrictions needs access to the room, the Company's personnel will do their best to provide what is required from the secure room to the individual by means of:

- Providing access to the premises as far as possible by reasonable accommodation
- Access to information in a format that accommodates a Disability as reasonable
- Respecting the independence of disabled Customers by allowing disabled Customers to act
- Respecting the dignity of disabled Customers
- Considering integration and equal opportunity of disabled Customers

It should be noted that only authorized personnel have access to the secure room and it is not available for touring to customers.

## **6.11 Support Persons**

It is the policy of the Company to allow disabled Customers to be accompanied by a support person when accessing the Company's goods and services.

## 8 Training Objective

Train all staff at Colour Innovation on how to interact with people with disabilities.

Training includes a review of AODA's purposes, requirements, and instruction about the following matters:

1. How to interact and communicate with persons with various types of disability.
2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

### 8.1 Customer Service Training Outline

Discuss different ways of interacting with individuals with disabilities. Colour Innovations and Raining Creative are committed to ensuring that people with disabilities have the same opportunity of access to our services in a similar way, as these services are available to others we serve.

Example of barriers:

1. **Access Issues to Facility:** Disabled Parking spot is available closest to the entrance door for those who require access or help reaching our facility. Facility has a ramp that can be used for those who require a wheelchair to enter the building.
2. **Low Vision:** all data can be supplied to a client or employee in PDF format to allow for the individual to use a screen reader for data.
3. **Learning Disability:** Staff can read documentation over the phone or in person to person with reading disability to help inform the person.
4. Allowing service animals or support help in designated areas within the facility. Only primary areas in the front office can allow for service animals. If the individual needs access to production area, service animal can be held in an office where he/she will be safe.

**8.2 Roles and Responsibilities for CI’s Project Team**

Personnel	Responsibilities
<b>Company</b>	To inform and provide access to the Accessibility Act
<b>Employees</b>	To provide an environment where it is safe and fair for all those around them  To inform management of barriers that can prevent someone with a disability from performing same work as those who are not disabled  To inform management if they require modifications to current working environment to help them perform their job with their current disability
<b>Customers</b>	To provide feedback of barriers faced that may pose an issue for their situation
<b>Contracts</b>	Shall follow the policies and regulations set forth within Colour Innovations and AODA

**8.3 Work Related Discussions**

The following will be discussed during training in order to inform employees how to access, manage, deal with, and report barriers that would hinder the Company from providing a fair workplace for all its staff and customers:

- Accessible formats and communication supports for employees
- Workplace emergency response information
- Return to work process
- Modified work or work place
- Parking availability
- Designated safe areas for support animals and persons

# Forms

# Individual Accommodation Plan

Employee's Name	
Supervisor's Name	

Limitations	Job related tasks / activities affected by limitations	Is this an essential job requirement (yes or no)

### Description of Accommodation(s) Measures

Which job requirements/related tasks require accommodation support?	
What must the accommodation do to be successful/achieve success?	
What accommodation strategies/tools have been selected to facilitate this task/activity?	

### Accommodation(s)

Start Date (MMM-DD-YYYY)	End Date	Review Frequency and date

### Implementation

Actions to implement accommodation(s)	Assigned to	Due Date (MMM-DD-YYYY)

Information sources (identify and include the contact information for any experts consulted when building the plan such as family doctor, specialist, etc.)


# Return to Work Plan

Employee's Name	
Supervisor's Name	

**Objective**

At the end of the return to work process, the employee will return to his/her

<input type="checkbox"/> Original Job	<input type="checkbox"/> Original Job with modifications	<input type="checkbox"/> Alternate Job
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**Accommodations and transitional measures**

List any limitations the employee experiences as a result of his/her disability, how it affects different aspects of his/her job and any accommodations or safety measures required to help the employee return to work. Accommodations may include but are not limited to:

- Modified work hours/days
- Modified work location
- Modified job requirements
- Assistive device(s)
- Additional support
- If the measures will be phased in or out include a start end date

Limitations:	
Tasks/activities affected:	
Accommodation(s):	
Start Date (MMM-DD-YYYY):	
Start Date (MMM-DD-YYYY):	

**Assignment to alternate position**

Complete this section if the employee will not be returning to his/her original job. The assignment to an alternate position may be temporary or permanent.

Job Title:		Length of Assignment	(MMM-DD-YYYY)
Description of new position, training requirements and safety precautions:			
Comments/Notes:			

\_\_\_\_\_  
Employee's Signature

\_\_\_\_\_  
Supervisor's Signature