

# CORP-016 AODA – Integrated Accessibility Standards Regulation (IASR) Policy

Organization	Holland Power Services Inc.			
Policy Owner	Human Resources			
Reviewed by	Executive Committee			
Approved by	President & CEO			
To be reviewed by	VP Finance & Administration August 15, 2024			
Document Distribution	Policy Binder, Teams, BambooHR			
This policy is for internal use only				

Note: The most up-to-date versions of all policies are posted in Teams for the Group All Holland Power Services Inc. (HPS) Full Time Employees in the Policies Folder. Printed copies should not be relied upon to be the most current version.

## 1. APPLICATION

This policy applies to all Holland Power Services employees, Board Directors, contractors, and consultants and their interactions with each other.

## 2. PURPOSE

- 2.1. To provide the overarching framework that guides the review and development of other corporate policies, standards, procedures and guidelines to comply with the standards developed under the Accessibility for Ontarians with Disabilities Act ("AODA"), 2005 and relevant standards in the other Provinces and States where we operate.
- 2.2. To provide a Statement of Commitment that highlights HPS's organizational commitment to meet the accessibility needs of persons with disabilities.
  - 2.3. To provide the general requirements that are applicable to all Holland Power Services IASR procedures.
- 2.4. To establish the Integrated Accessibility Standards, Ontario Regulation 191/11 for Holland Power Services in accordance with the AODA, 2005.

# 3. STATEMENT OF COMMITMENT

- 3.1. Holland Power Services is committed to treating all individuals in a way that allows them to maintain their dignity and independence. HPS believes in the principles of integration and equal opportunity and is committed to creating a barrier-free environment by identifying, removing and preventing barriers that may limit persons with disabilities.
- 3.2. Holland Power Services will ensure that programs, services, goods, information, facilities, vehicles and employment opportunities meet the needs of persons with disabilities through the implementation of this policy.

- 3.3. Holland Power Services will use reasonable efforts in meeting the needs of persons with disabilities in a timely manner.
- 3.4. To ensure Holland Power Services is in compliance with AODA, 2005 we commit to ensuring compliance with IASR standards through the development of policies, procedures and work instructions.

## 4. GENERAL REQUIREMENTS (Applicable to all Holland Power Services IASR Procedures)

- 4.1. Holland Power Services will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Annual status reports will be prepared that will report on the progress of the steps taken to implement HPS's accessibility plan. Accessibility plans will be made available in an accessible format, upon request.
- 4.2. Holland Power Services will incorporate accessibility criteria and features when procuring or acquiring goods, services or when renovating/upgrading and building facilities. The only exception is in cases where it is impracticable to do so.

## 4.3. Accessibility Training

Training will be provided to each person according to their needs and duties, and as soon as it is practicable after the person is assigned the applicable duties. Training will be provided as part of the orientation training package for new employees and on an ongoing basis in connection with changes to policies, procedures and practices governing the provision of goods or services to persons with disabilities.

All training curriculum will be designed to ensure all participants are aware of and understand all IASR Standards and their related duties.

Holland Power Services will maintain records on the training provided, when it was provided and the number of employees that were trained.

4.5. All documents will be made publicly available and, on request, they will be provided in an accessible format.

## 5. ROLES & RESPONSBILITIES

# 5.1 Employees

- Review, adhere and attend training on all policy and procedure requirements
- Communicate their accessibility requirements to their supervisor and/or HR and Health and Safety

#### 5.2 Supervisors

- Review, adhere and attend training on all policy and procedure requirements
- Ensure that they are familiar with the needs of any direct reports and that the
  appropriate accommodations are in place to assist the employee with any barriers

# 5.3 Holland Power Services Internal AODA Committee (to be constituted when required)

- Attend committee meetings to review all employee feedback and associated corrective action items
- Conduct annual review to ensure completion of the multi-year plan
- Assume responsibility for the completion of outstanding actions for their area of responsibility and report back to the Committee as required
- Provide support to Managers as required to ensure AODA compliance

## 5.4 Manager, Human Resources

- Act as the Internal AODA Committee Leads
- Prepare an annual summary of feedback and associated corrective action items for AODA Committee to review
- Provide updates and a summary of customer feedback to Executive Committee
- Ensure the retention of all documentation related to AODA
- Lead the review of AODA policy, procedures and multi-year plan as required for the Internal AODA Committee
- Complete all required compliance reports for government agencies

#### 5.5 Operations, Facilities, Administration, Accounting, Fleet and HR Managers

- Receive employee feedback for their respective department
- Prepare and provide responses in a timely manner
- Provide the Manager, Human Resources with all customer feedback forms and associated corrective actions
- Ensure that any construction and/or renovation of our facilities will meet the needs of persons with disabilities

## 5.6 Health & Safety Manager

- Prepare and update emergency procedures, plans or public safety information and make it available to the public, upon request
- Store individual workplace emergency response information for employees in a secure area
- Work with employees and their managers to ensure the workplace emergency response information is understood and can be seamlessly implemented in the case of an emergency
- Review individual workplace emergency response information for employees when:
  - o Employee's move to a different location in the organization
  - Employee's overall accommodation needs or plans are reviewed; and
  - General emergency policies are reviewed
- Develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities

# 6. IASR RELATED PROCEDURES AND WORK INSTRUCTIONS

- 6.1. Employment Standards Procedure (CORP-PRO-016C)
- 6.2. Information and Communications Standards Procedure (CORP-PRO-016D)
- 6.3. Return to Work Process and Plan (CORP-PRO-016E)
- 6.4. Individual Accommodation Process and Plan (CORP-PRO-016F)

# 7. RELATED DOCUMENTS

- 7.1. Accessibility for Ontarians with Disabilities Act, 2005
- 7.2. Integrated Accessibility Standards (Ontario Regulation 191/11)
- 7.3. Holland Power Services Multi-Year Accessibility Plan