

**Welded Tube of Canada Corp.
Accessibility for Ontarians with Disabilities Act, 2005, Ontario**

**Integrated Accessibility Standards Regulation 191/11
Multi-Year Accessibility Plan (ref: section 4)**

Part I – General Requirements

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
3	Establishment of Accessibility Policies	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. (refers to the Integrated Accessibility Standards, Reg. 191/11)	Draft policy or policies and submit for approval. - Assign a person/team to maintain & update	AODA Implementation Committee	Workplace Emergency Response Policy that apply to WTC and OSH approved and <u>compliant</u> (SOP-0490). Integrated Accessibility Policies that apply to WTC and OSH approved and <u>compliant</u> (SOP-0539)	January 1, 2014
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;	- Attend public workshop and write draft. - Meet with Accessibility Committee to identify barriers. - Notify Corporate Communications to post the Plan on the WTC website [s. 4(1)(b)].	AODA Implementation Committee	Multi-Year Plan for WTC and OSH completed and <u>compliant</u> . Plan posted on the WTC website. <u>compliant</u> .	January 1, 2014 Review and update at least once every 5 years.

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
7	Training	<p>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.</p> <p>7.(2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.</p> <p>7.(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7.(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>7.(5) ...every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Training to be conducted at crew meetings.</p> <p>Training to be conducted with Ontario Steel Haulers employees and their Owner/Operators.</p> <p>WTC and OSH Employees will receive handouts which will;</p> <p>a. summarize the applicable Integrated Standards,</p> <p>b. provide a definition of a disability from the Ontario Human Rights Code, and,</p> <p>c. OSH employees will also receive training for the Customer Service Standard</p> <p>WTC Employees will complete a quiz for (a) and (b).</p> <p>OSH employees will complete a quiz for (a), (b) and (c).</p>	Jeff Cooper to propose syllabus with review by Waterman, Shiff and Bujan	In-development	January 1, 2015

Part II – Information and Communications

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
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.	<ul style="list-style-type: none"> - Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured. - Determine what accessible formats and communication supports we will provide upon request. - Ensure staff and management are aware of the need to accommodate upon request through training. - Requests to be directed to Corporate Communications. 	AODA Implementation Committee.	<p>Arrangements for Accessible Formats are available.</p> <p>Training of staff still to be completed.</p>	January 1, 2015

Section	Initiative	Description	Action	Responsibility / Who requires training	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.	<ul style="list-style-type: none"> - Determine what accessible formats and communication supports we will provide to persons with disabilities upon request. - Ensure these formats and supports can be provided in a timely manner (ex: same time, 24 hours). - Ensure staff and management are aware of the need to accommodate upon request through training. - Requests to be directed to Corporate Communications. 	AODA Implementation Committee.	Ongoing	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> - Communicate to staff and management of this requirement through training. Requests directed to Corporate Communications. - Develop protocol for situations where a suitable agreement cannot be made. 	AODA Implementation Committee.	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Post on website (included in Policy).	AODA Implementation Committee.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
14	Accessible Websites & Web Content	<p>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.</p> <p>14.(4) Designated public sector organizations and large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <ol style="list-style-type: none"> 1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A. 2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ol style="list-style-type: none"> i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). 	<p>- Communicate the requirements of this section for the new WTC website being developed with the WTC Web Designer.</p> <p>- Communicate the requirements to be implemented by 2021 with the Web Designer to ensure the website can be upgraded within the timeframe.</p>	Andrew Weston	<p>A new WTC website is to be launched November 2014.</p> <p>The new website will be compliant to Level A standards initially.</p>	<p>Level A for new websites by: January 1, 2014</p> <p>and</p> <p>Level AA [other than 1.2.4 Captions (live) and 1.2.5 Audio Descriptions (Pre-recorded)] for all websites by: January 1, 2021</p>

Part III – Employment Standard

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
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.	<ul style="list-style-type: none"> - Include a statement in job posting stating our commitment in providing accommodations for persons with disabilities. - Identify where you advertise, paper, website, bulleting board? 	AODA Implementation Committee.	Ongoing	January 1, 2016
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>23.(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>	<ul style="list-style-type: none"> - Notify applicants (telephone, email, letter, etc.) based on required accommodations advised. - Identify barriers: location of interview room, room set up for in person interviews, interviewing timelines, supports, paperwork, etc. - Develop interview guidelines. 	AODA Implementation Committee.	Ongoing	January 1, 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.	Put statement in hire letter/agreement.	AODA Implementation Committee.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
25	Informing employees of supports	<p>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.</p> <p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>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.</p>	<p>25.(1) Circulate policy, training, and staff announcements.</p> <p>25.(2) Upon hire.</p> <p>25.(3) See 25 (1).</p>	AODA Implementation Committee.	Ongoing	January 1, 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.	<ul style="list-style-type: none"> - Functional audit of information specific to departments. - Audit of regular communications. - List what the employee will require - ie. Policy, communication supports that are available (accessible PDFs, large print, etc.). 	AODA Implementation Committee.	Ongoing	January 1, 2016

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27	Workplace Emergency Response Information	27. (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.	<p>- Write "Workplace Emergency Response Policy"</p> <p>- canvass workforce for those employees requiring an individualized workplace emergency response plan</p>	<p>Barry Sonshine</p> <p>Alternatively, workforce may be canvassed at crew training sessions during training for the Integrated Standards and OHC training.</p>	<p>- Completed and <i>compliant</i> Workplace Emergency Response Policy SOP-0490</p> <p>Notification to workers to be included in the "Operations Viewpoint" requesting workers requiring Individualize Emergency Response Plans to contact HR. [agreed at the Policy Safety Committee Meeting, June 27/14]</p>	<p>January 1, 2012</p> <p>January 1, 2012.</p>
28	Documented Individual Accommodation Plans	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 for employees with disabilities.	Develop process.	AODA Implementation Committee.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
28	Documented Individual Accommodation Plans	<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements: 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.</p>	Develop process.	AODA Implementation Committee.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
28 cont.	Documented Individual Accommodation Plans	28.(2) 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.				
28	Documented Individual Accommodation Plans	28.(3) Individual accommodation plans shall, (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; (b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided.	Develop process.	AODA Implementation Committee.	Ongoing	January 1, 2016
29	Return to Work Process	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. 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;	29.(1) Review current process for systemic barriers. 29.(2) Review current process for systemic barriers.	AODA Implementation Committee.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
29 cont.	Return to Work Process	<p>29.(3) (b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>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.</p>	29.(3) Include in current process checklist.			
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.	Review current process keeping individual accommodation plan in mind.	AODA Implementation Committee.	Ongoing	January 1, 2016
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.	Review current process keeping individual accommodation plan in mind.	AODA Implementation Committee .	Ongoing	January 1, 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.	Must consider accessibility needs of employees with disabilities and individual accommodation plans when redeploying employees with disabilities.	AODA Implementation Committee.	Ongoing	January 1, 2016

Part V – Compliance

Section	Initiative	Description	Action	Responsibility / Who requires training	Status	Compliance Date
86.1	Accessibility reports	<p>86.1 (1) Subject to subsections 33 (3) and (5) of the Act, organizations shall file the accessibility report required under subsection 14 (1) of the Act with a director according to the following schedule:</p> <p>3. Every three years, in the case of large organizations.</p> <p>86.1 (2) The reporting schedule referred to in subsection (1) begins to apply as of January 1, 2013, with the first report being due, (c) as of December 31, 2014, in the case of large organizations.</p>	<p>a. File WTC’s second Accessibility Report online with the <i>Ministry of Economic Development, Employment and Infrastructure</i></p> <p>b. File first Accessibility Report for OSH.</p> <p>To be reviewed and filed every 3 years.</p>	<p>Jeff Cooper (administrator)/ Robert Pike (certifier).</p> <p>Jeff Cooper (administrator)/ Barry Sonshine (certifier for Ontario Steel Haulers)</p>	<p>In-Process (training requirements to be completed prior to filing report.)</p> <p>In-Process (training requirements to be completed prior to filing report.)</p>	<p>December 31, 2014</p> <p>December 31, 2014</p>