

AODA: Integrated Accessibility Standards

Purpose

The Integrated Accessibility Standards Policy has been established to ensure that PenFinancial Credit Union Limited (the "Credit Union") complies with the Government of Ontario's Integrated Accessibility Standards (Regulation 191/11), under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

These Standards are developed to remove barriers and increase accessibility for employees and the public that we serve with disabilities, in the areas of information, communication and employment.

Policy Statement

The Credit Union is dedicated to treating all people in a manner that allows them to maintain their dignity and independence. The Credit Union believes in integration and equal opportunity and is committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers for persons with disability. Where it is not possible to remove barriers, the Credit Union will make efforts to accommodate persons with disabilities in a timely, effective and reasonable manner.

The Credit Union supports the principles of the AODA and the Integrated Accessibility Standards Regulation.

As a designated organization, the Credit Union's goal is to ensure accessibility for our employees and the public we serve.

Definitions

For the purpose of this policy, the following terms are defined in accordance with the AODA as follows:

Accessible Formats: Refers to materials that have been converted to accessible formats which includes, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation: The special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons with disabilities. Accommodation shall vary depending on the person's specific accessibility needs.

Communications: The interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communication Supports: Methods and aids that facilitates effective communications with persons with disabilities that include, but is not limited to, captioning, alternative and augmentative communication supports, plain language, and sign language.

Disability: Disability is defined under the AODA and the Human Rights Code as:

- 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.

Information: Means data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Redeployment: Means the reassignment of works to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

Supervisor: A person who has charge of a workplace or authority over a worker. Generally this would include those with a position title such as Director, Manager or Supervisor, as well as any other management type position, or those in a temporary supervisory position.

Unconvertible:

- a) if it is not technically feasible to convert the information or communications;
- b) the technology to convert the information or communication is not readily available.

Worker: Refers to any person regarding whom the Credit Union pays wages or a salary, has control over their assigned work and has a right to control the details of their work. This includes, but is not limited to:

- a) full time workers
- b) part time workers
- c) seasonal workers
- d) contract workers

General Provisions

Multi-Year Accessibility Plan

The Credit Union will develop, maintain and document a Multi-Year Accessibility Plan outlining the Credit Union's phased in strategy to prevent and remove barriers from its workplace and improve opportunities for person with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, the Credit Union will provide a copy of the Accessibility Plan in an accessible format.

Self-Service Kiosks

The Credit Union will have consideration for accessibility when designing, procuring or acquiring self-service kiosks (i.e. ATMs) to better serve persons with disabilities.

Training

The Credit Union will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation , continue to provide training on AODA and the Ontario Human Rights Code as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing policies; and
- all other persons who provide goods, services or facilities on behalf of the credit union

The training will be appropriate to the duties of the employees, volunteers or other persons.

Employees will be trained within a reasonable time after changes are made to the accessibility policy. New employees will be trained at the time they are hired. A record of training provided will be kept.

Training shall be scheduled and implemented by January 1, 2014.

Information and Communications Standards

The Credit Union shall create, provide and receive information and communications in methods that are accessible to persons with disabilities. If it is determined that it is not technically feasible to convert the information or communication, or the technology to convert the information or communication is not readily available the person requesting the information shall be provided with:

- an explanation as to why the information or communication is not convertible;

- a summary of the unconvertible information or communication.

Feedback

Under the Accessibility Standard for Customer Service, the Credit Union developed a feedback process for receiving and responding to feedback about how products or services are provided to people with disabilities. This process is located under section 4 of the *AODA: Accessibility for Ontarians with Disabilities Act, 2005 policy*.

Accessible Formats and Communications Supports

Upon request, the Credit Union 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.

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

The Credit Union will notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

The Credit Union will ensure that our website and web content is accessible according to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and increasing to Level AA. Unless otherwise impracticable, by January 1, 2014 any new web content shall conform to WCAG 2.0 Level A and by January 1, 2021 all websites and web content shall conform to WCAG 2.0 Level AA.

Employment Standards

The Employment Standards builds upon the present requirements under the Ontario Human Rights Code in relation to whereby the Credit Union is required to accommodate persons with disabilities through the job application process and the employment relationship. It applies in respect of workers and does not apply to volunteers and other non-paid individuals.

Recruitment

The Credit Union will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. This may take the form of a notice posted on the Credit Union website or a statement on a job posting for which "accommodation for applications with disabilities is available upon request.

Recruitment, Assessment or Selection Process

The Credit Union will notify applicants, when they are individually selected to participate further in an assessment or selection process and that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, the Credit Union will 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.

Notice to Successful Applicants

When making offers of employment, the Credit Union will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

The Credit Union 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 feasible after commencing employment.

Accessible Formats and Communications Supports for Employees

Upon request, the Credit Union will consult with an employee with a disability 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. The Credit Union will consult with the employee making the request to determine the suitability of an accessible format or communication support.

Workplace Emergency Response Information

The Credit Union will provide individualized workplace emergency response information to employees with a disability. If the disability is such that the individualized information is necessary, and if the Credit Union is aware of the need for accommodation due to the disability, the Credit Union will provide this information as soon as feasible after becoming aware of the need for accommodation.

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

The Credit Union will review the individualized workplace emergency response information when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed.

Documented Individual Accommodation Plans

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

The Accommodation Process

The Credit Union is committed to providing accommodations for persons with disabilities. When an employee with a disability requests an accommodation, the following shall serve as a guide to the accommodation process:

1. Recognize the need for accommodation

The need for accommodation can be:

- requested by the employee through their supervisor/manager or through HR; or
- identified by the employee's supervisor/manager

2. Gather relevant information and assess needs

The employee is an active participant in this step:

- the Credit Union does not require confirmation of the diagnosis to provide an accommodation; it needs to know only about the employee's functional abilities and any symptoms that the employee may experience that require accommodation
- the manager may ask for a functional abilities assessment from the employee's physician together with details of any limitations or modifications to the existing job required to provide a reasonable accommodation
- the employee and his/her manager together with Human Resources will evaluate the information provided determine the most appropriate measure
- an external expert may be involved; at the Credit Union's expense

3. Formal, individual accommodation plan

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

- accessible formats and communication supports, if requested;
- workplace emergency response information, if required;

- any other reasonable accommodation that is to be provided

The accommodation plan is provided to the employee in a format that takes into account accessibility needs, and

- the employee's personal information is protected at all times
- if the accommodation plan is denied, the manager will provide the employee the reason for the denial, in an accessible format

4. Implement, monitor and review

The employee and manager monitor the accommodation to ensure that it has effectively resolved the challenges:

- formal reviews are conducted at a predetermined frequency
- the accommodation plan is reviewed if the employee's work location or position changes
- the plan is reviewed if the nature of the employee's disability changes

If the accommodation plan is no longer appropriate, the employee and manager shall work together to gather relevant information and reassess the employee's needs in order for the employer to find the best and most reasonable accommodation measure (see step 2 above).

Return to Work Process

The Credit Union 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 Credit Union 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.

Performance Management, Career Development and Advancement and Redeployment

The Credit Union 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.

Monitoring and Contraventions

Supervisors shall monitor current practices to ensure compliance. Failure to comply with this policy may result in disciplinary action, up to and including dismissal.