



# Spinnaker Industries

## Accessibility for Ontario with Disabilities Act

### Multi-Year Accessibility Plan



**2019**

Version	Issue Date	Department	Draft Developed	Approved
1.0	February, 2019	Safety Department	Bellator Group Safety Consulting	Sr. Management & JHSC



## SPINNAKER INDUSTRIES MULTI- YEAR ACCESSIBILITY PLAN

(Accessibilities for Ontario with Disabilities Act (AODA), 2005 – Ontario Regulations 191/11, Integrated Accessibility Standards).

#	Initiative	Legislative Requirements/ Areas of Concern	Action Item	Assigned Party	Completion Date
<b>General Requirements: Policy and Procedure Requirements</b>					
2019-01	Develop and Review AODA Policy Statement	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 AODA regulations.	Spinnaker Sr. MGT has developed, reviewed and signed off on AODA policy Statement	Sr. MGT & Safety Consultant	Feb-19
2019-02	Develop and Review AODA Procedure		Spinnaker Sr. MGT has developed and review AODA Procedure	Sr. MGT & Safety Consultant	Feb-19
2019-03	Develop Multi- Year Accessibility Plan	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; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years.	Spinnaker's Sr. MGT & JHSC has developed a multi year plan to identified and remove barriers.  Sr. MGT has posted the AODA Policy and Plan on the Spinnaker's Website  Sr. MGT and JHSC have reviewed the plan on February, 2019 and at least every 5-years thereafter.	Sr. MGT & JHSC	Feb-19
2019-04	Company wide Training	7 (1) Every organization shall ensure that training is provided on the requirement AODA regulations and program	Spinnaker Sr. MGT and Bellator Safety Consultant to develop standard company training on AODA. Training to be provided to all staff on annual basis.	Bellator Safety Group	June 4-19



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2019-05	Feedback Process	11 (1) Every organization that has the process to respond to feedback shall ensure that the process are accessible to persons with disabilities by providing provisions of accessible formats and communication	The policy has been updated to include provisions to handle the feedback process. This will be reviewed on a case-by-cases basis. All disputes will be handled by the V.P of Engineering	Sr. MGT + JHSC	Ongoing
2019-06	Accessibility Formats & Communication Supports	12 (1) Every organization shall provide accessible formats and communication supports for persons with disabilities, a) Timely manner b) At no cost that is more than the regular cost	This will be reviewed on a case-by-cases basis. All disputes will be handled by the V.P of Engineering	Sr. MGT + JHSC	Ongoing
2019-07	Emergency procedure, plan and public safety	13 (1) Emergency procedures, plan or public information must be available in accessible format or with appropriate persons as soon as practicable.	Spinnaker ER Plan has been updated to include accessibility provisions. Members requiring the ER plan in accessible format will be made available and on a case-by-case basis handled by the V.P of Engineering.	Bellator Group + JHSC	Ongoing
2019-08	Accessible website and content	14 (2) Large organizations shall make their websites conform with the WWW Consortium Web content Accessibility guidelines (WCAG 2.0) initially at Level A and increasing to Level AA	Website requirements to be made available to IT department. WCAG 2.0 Level A Due Jan – 2020 WCAG 2.0 Level AA due Jan – 2021 1.2.4 Captions (Live) and 1.2.5 Audio descriptions (pre-recorded)	IT Manager	Ongoing
2019-09	Recruitment	22 Every employer shall notify its employees and public about availability of accommodation for applications with disability in recruitment processes.	Spinnaker provide job recruitment through 3 <sup>rd</sup> party agencies and website sites. Job postings will be updated to show accommodations for accessibility will be provided.	Admin Assistant	Ongoing



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2019-10	Recruitment Assessment or Selection process.	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.	The hiring manager will make this accommodation on a case-by-case basis. Notification that accommodation is available will be given at the time of the assessment.	Hiring Manager	Ongoing
2019-11	Notice to Successful Applicant	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Notification will be made available in the new hires offer package.	Admin Assistant	Ongoing
2019-12	Information of Employee support	25 (1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, job accommodations and accessibility needs. (2) Employers shall provide this information to new employees as soon as practicable; (3) Employers shall provide updated information when change to policies on accommodations take into account an employee's accessibility needs.	Information will be available on the Spinnaker's website and through employee training  Information will be available to new hire's during orientation.  All policy changes will be made available on the Spinnaker's website and employees will be trained on the next available training session.	Hiring Manager & IT Manager	Ongoing



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2019-13	Accessibility formats and communication support for employees	<p>26 (1) Every employer shall consult with the employee to provide or arrange for provision of accessible formats and communication support:</p> <ul style="list-style-type: none"> <li>a) Information that is needed to perform job,</li> <li>b) Information that is generally available to employees in the workplace</li> </ul> <p>(2) Employer shall consult with the employee making the request.</p>	The department manager will work with the V.P of engineering, and employee to identify and make accommodations.	Department Head + V.P Engineering	Dec, 2019
2019-14	Workplace Emergency Response Information	<p>27 (1) Every employer shall provide individualized workplace emergency response information to employees who have disabilities.</p> <p>(2) if employee requires assistance (with consent) the employer shall provide the workplace emergency response information to designated to assist employee with disability.</p> <p>(3) the employer shall provide the information as soon as practicable after the employer becomes aware of the need to accommodate.</p> <p>(4) Every employer shall review the workplace ER information when:</p> <ul style="list-style-type: none"> <li>a) Employee moves to new location</li> <li>b) Accommodation needs or plans are reviewed</li> <li>c) Employer reviews its general ER response plan</li> </ul>	<p>Currently at Spinnaker there are no employees that require accommodations during a workplace emergency response.</p> <p>Sr. MGT will provide accommodation as needed on a case-by-case basis.</p> <p>Sr. MGT and JHSC will review the ER Response Plan annual and make changes to accommodate accessibility needs.</p>	Sr. MGT	Dec, 2019



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2019-15	Documented individual accommodation plans	<p>28 (1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The accommodation plan shall include:</p> <ul style="list-style-type: none"> <li>a) Manner employee can participant in developing the accommodation plan,</li> <li>b) Means by which employee is assessed,</li> <li>c) Manner in which employee can request evaluation by outside medical expert,</li> <li>d) Manner in which employee can request representative from bargaining agent,</li> <li>e) Steps taken to protect privacy of employee's information,</li> <li>f) Frequency with which the accommodation plan will be reviewed and updated,</li> <li>g) Manner to respond to denied accommodation plan,</li> <li>h) Means or providing accommodation plan in a format that takes into account accessibility needs.</li> </ul>	<p>Templates are available and will requests will be handed on a case-by-case basis from the V.P of Engineering.</p> <p>Each format to be determined on a case-by-case basis taking into account the employee's accommodation needs.</p> <p>Spinnaker employees do not have a bargaining agent however employee representation can be made through the Health &amp; Safety Rep or a member of the JHSC.</p>	Supervisor	Dec, 2019



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2019-15	Return to Work Process	<p>29 (1) Every employer shall develop and have in place a RTW process for its employees who have been absent from work due to disability and require disability-related accommodation to return to work.</p> <p>(2) RTW process shall include:</p> <ul style="list-style-type: none"> <li>a) Steps the employer will take to facilitate RTW of employee</li> <li>b) Use documented accommodation plans s.28</li> </ul> <p>(3) RTW process referenced in this section does not replace any RTW process created under other statute.</p>	<p>Refer to the Spinnaker Health &amp; Safety Manual that covers RTW action plan, policy and procedures for all employees.</p> <p>RTW Plan reviewed annually by Sr. MGT and the V.P of Engineering.</p>	No Action	Feb, 2019
2019-16	Performance Management	30 (1) An Employer that uses performance management in respect of its employees shall take into account accessibility needs to employees.	Sr. MGT and Department heads will review this on a case-by-case basis.	No Action	Feb, 2019
2019-17	Career development and advancement	31 (1) An employer that provides career development and advancement to its employees shall take into account accessibility needs and individual accommodation plans when providing career development.		No Action	Feb, 2019
2019-18	Redevelopment	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.		No Action	Feb, 2019