

	AODA MULTI YEAR PLAN	Reference	AODA
		Approved By	HR Director
		Effective Date	Jan 1, 2014
		Date of Review	Sept. 4 2018

AODA MULTI YEAR PLAN

INTRODUCTION

The BMP Group consisting of Bailey Metal Products Limited and Bailey Metal Processing Limited (here in after referred as “BMP”) is committed to working towards full compliance with all standards under the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA") as they are introduced. In doing so, we affirm our commitment to providing quality services in a manner that respects the dignity and independence of persons with disabilities.

The Multi-Year Accessibility Plan outlines the policies, achievements and actions that BMP have put in place to improve opportunities for people with disabilities. The current plan covers a five-year period (2017-2022) to align with our strategic plan.

ABOUT BMP

The Bailey Metal Products Limited is a manufacturing company specializing in roll-forming operation. It services the construction industry and is located in Concord, Ontario.

The Bailey Metal Processing Limited (BMPL) is manufacturing company specializing in providing slitting services to Bailey Metal Products Limited and other customers. BMPL employs just over 50 employees. The facility is located in Burlington, Ontario

STATEMENT OF COMMITMENT

BMP is committed to treating all people with dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under AODA.

BMP is committed to continue developing, implementing and maintaining policies governing how it will achieve accessibility through meeting the requirements under AODA and its associated regulations, the Customer Service Accessibility Standard and the Integrated Accessibility Standard. To facilitate that commitment, BMP will establish, maintain and document a multi-year accessibility plan that will be reviewed and updated every three years to identify progress made in addressing barriers.

The plan is posted on the BMP website.

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I. CUSTOMER SERVICE ACCESSIBILITY STANDARD

The Customer Service Standard, the first standard under AODA was implemented by the BMP 2011.

BMP uses reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

- Services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of services to persons with disabilities, and others, is integrated unless an alternate measure is necessary, whether temporarily or on a permanent basis.
- Persons with disabilities may use assistive devices and/or support persons in the access of goods or services.
- Persons with disabilities and their service animals are accommodated in all aspects of service provision unless the animal is otherwise excluded by law.
- BMP employees, when communicating with a person with a disability, will do so in a manner that takes into account the person's disability.

BMP has been in compliance with the Accessible Customer Service Regulation under AODA since 2011.

The following measures have been implemented by BMP:

- A member of management has been designated to present and/or revise practices or procedures. A policy review occurs annually.
- The Accessible Customer Service Policy is developed and available.
- Notice will be provided on the website, email, over the phone or in writing where applicable when a service disruption occurs and will be done as quickly as possible if the disruption is unexpected.
- Training on AODA Customer Service has been provided and is given to every person who participates in developing the policy, practices and procedures and this includes every person who deals with the public on behalf of BMP, i.e. employees, management, and volunteers as applicable.
- AODA Training, including Customer Service, is also part of mandatory onboarding for all new hires at BMP.
- Completion of training of all employees is tracked and recorded.
- Comments relating to our programs and services with regard to customer service are welcomed and appreciated. A process has been established to encourage feedback regarding the way that BMP provides goods and services to people with disabilities. The feedback process is posted on the BMP website, and comments can also be made verbally, by e-mail, or in writing.

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- All feedback collected from clients, staff or the general public is reviewed and analyzed to identify potential gaps in customer services, and to ensure appropriate actions are taken.
- Report compliance with the customer service standard
- All regulatory-related requests for accommodation and accessibility needs by the public and customers will be handled by the Director of HR in accordance with the requirements set forth in AODA and its associated regulations and the Ontario Human Rights Code.

II. INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)

a) Accessible Emergency Information

In accordance with section 13 of the Ontario Regulation 191/11, BMP has developed emergency and safety procedures to follow in a given emergency situation (fire, bomb threat, earthquake, lockdown etc.) These procedures will be provided to individuals with disabilities upon request.

BMP recommends that all persons with disabilities or special needs to become familiar with the emergency procedures and policies.

During the onboarding process for new hires, BMP informs new hires of the availability of individual emergency response plans that takes into account their disability.

BMP is committed to providing members, employees and the public with a publicly available emergency information, plans or public safety information in an accessible manner upon request.

BMP will continue to provide employees with disabilities with individualized emergency response information when necessary, and as soon as practically possible. If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent the workplace emergency response information will be given to the designated employee providing the assistance.

BMP has a process for documenting issues of accessibility and recording and providing accommodation for individualized accessible emergency response information. BMP will continue to review the individualized workplace emergency response plans when necessary, such as when the location of an employee changes.

b) Training

BMP will provide training to employees, volunteers and other employees on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a manner that best suits the duties and needs of employees, and volunteers and every person

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who deals with the public on behalf of BMP, including third parties i.e. employees, volunteers or management.

BMP has taken the following steps to ensure employees were provided with the training needed to meet Ontario's accessible laws:

- Developed a process that determines and ensures that correct training is delivered on the requirements of the IASR and the Ontario Human Rights Code.
- Providing educational or training resources or materials in an accessible format that takes into account the accessibility needs of a person with a disability upon request.
- Ensures that all new employees and volunteers all complete AODA training within two weeks of employment.
- Maintains a database of the training, participant's names and dates of completion of training. All employees and volunteers who have received training will be required to sign off that they have received training in accordance with AODA.

III. INFORMATION AND COMMUNICATIONS STANDARDS

BMP is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs. We want to achieve the most effective and efficient access to information for all users.

To achieve this objective, BMP has undertaken the following plans to ensure compliance with the IASR standard:

- That BMP will ensure that essential information is accessible to persons with disabilities.
- A feedback process has been established that is accessible. Alternate formats are also available such as telephone, mail and in-person. These processes have been communicated to the public and are available on our website.
- Our website has been designed to be user friendly for people with a range of needs.
- Training on the AODA Information and Communication Standards has been provided to staff that are involved in developing or disseminating information internally or externally on behalf of the organization.

Website Information

In accordance with the IASR, BMP can convert existing emergency & public safety information into a format that will allow it to be made available in accessible formats on request and in a timely manner.

BMP has complied with the IASR requirements and made its website and content compliant to conform to World Wide Web Consortium Web Content Accessibility Guidelines 2.0, Level A.

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The BMP can also do the following:

- Continue to assess accessibility of existing website organization and content.
- Consult with persons requesting alternative formats.
- Post a notice on the website and on premises that information is available in a variety of accessible formats.

IV. EMPLOYMENT STANDARDS

BMP is committed to inclusive and accessible employment practices that attract and retain individuals with disabilities. We have taken the following steps to notify the public and employees, that when requested, BMP will accommodate people with disabilities throughout all phases of the employment relationship, which are detailed more fully below.

a) Recruitment

BMP is committed to ensuring that our recruitment and assessment processes are fair and accessible. All supervisors and management who are involved in hiring are required to complete AODA and Human Rights training.

BMP will take the following steps to ensure compliance with this standard:

- Specify that accommodation is available for applicants with disabilities throughout the entire recruitment process in the recruitment material.
- When making offers of employment, BMP will notify successful applicants of policies for accommodating employees with disabilities within the Employment Agreement.
- All BMP job postings will state that accommodations will be available upon request for persons with disabilities.
- Inform employees of policies supporting employees with disabilities. This information will be provided to new employees as soon as is practicable after hiring.
- Provide updated information on accommodation policies to employees when they occur.
- Consult with employee to determine suitability of format or support.

b) Documented Individualized Accommodation Plans:

BMP is committed to providing documented individual accommodation plans that include the following:

- Participation of the employee requiring the individual accommodation plan.
- Requesting outside medical evaluation, to the extent necessary, to determine if accommodation can be achieved and how.

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- Ensuring a high level of privacy is achieved, and that information is only disclosed to individuals as necessary and in order to achieve the accommodation needs of the person with a disability.
- Providing regular review, updates and communications with employee during the accommodation process.
- Providing an employee with information if a request for accommodation is denied.
- Providing Individual Accommodation Plans in a format that takes into account the needs of the employee.
- If required, including individualized workplace emergency response information.

c) Return to Work

BMP is committed to developing and putting in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability or injury.

BMP has developed and maintains a return to work process for our employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. The accommodation process is outlined in the BMP's Equal Opportunity (Accommodation) Policy. The process includes steps the BMP takes to facilitate the return to work process and uses the documented individual accommodation plan.

d) Performance Management, Career Development and Redeployment

BMP is committed to ensuring the accessibility needs of employees with disability needs are taken into account with regards to performance management, career development and redeployment processes.

BMP will review the following information and update all relevant accommodation policies to include the following:

- Policies that support addressing the accessibility needs of employees with disabilities, as well as taking into account individual accommodation plans when using performance management processes.
- Policies that support addressing the accessibility needs of employees with disabilities, as well as taking into account individual accommodation plans when providing career development and advancement opportunities.
- Policies that support addressing the accessibility needs of employees with disabilities, as well as taking into account individual accommodation plans when redeploying employees with disabilities.

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Summary of AODA Multi Year Plan

No	Reference IAS 191/11	Requirement	Status
1		Customer Service Policy	Policy is available and reviewed on an annual basis.
2		Provide Customer Service Training	Ongoing. The training material is developed and available. New employees are required to complete the training as a part of the orientation.
3	3(1)	Accessibility Policies	Policies are developed. Policies will be provided to those who request.
4	4(1)	Accessibility Multi Year Plan	The plan is developed and reviewed on a regular basis (at least once in 5 years). The multiyear plan will be provided to all those who request a copy. It will continue to be posted on the website.
5	7(1)	Training on Accessibility and Human Rights Code	Ongoing. The training will be provided to all new employees.
6	11(1)	Feedback process	Ongoing. The feedback process is established. It will be reviewed on a regular basis covering internal and external customers.
7	12(1)	Accessible Formats and communication supports for disabled persons.	Ongoing. The accessible formats are being determined on an ongoing basis.
8	12(2)	Consulting with disabled persons regarding the acceptable format.	Ongoing. BMP will contact the persons to determine their needs

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9	12(3)	Availability of the accessible format	Ongoing. BMP may provide such documents upon request by the disabled employees. Alternatively, the policies will be made available at reception. BMP may also post them on its website.
10	13(1)	Emergency Procedures & Plans	Ongoing. BMP will update the emergency Procedure. The related information will be provided in accessible format.
11	14 (2) & (4)	Accessible website & web content	In progress IT manager will ensure that the website and its contents confirm with World Wide Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and then to level AA by Jan 1, 2021.
12	22	Recruitment – Notify the availability of accommodation	Ongoing. Include a statement in the job ad “ We are committed to providing accommodations for persons with disabilities”
13	23(1)	Recruitment, Assessment & Selection Process	Ongoing. All handled by HR. Upon request, accommodations will be offered and support will be provided during assessment process.
14	24	Employment offer	Ongoing Include a statement in the employment offer that AODA policies are available.
15	25(1)	Inform that BMP supports accessibility needs of the employees	Ongoing. Regular training of employees

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No	Reference IAS 191/11	Requirement	Status
16	25(2)	Orientation of New employees	Ongoing Included in the orientation package.
17	25(3)	Updated training / Info	Ongoing Provide info on updated AODA policies and procedures
18	26(1) (2)	Accessible format & communication support for employees.	Ongoing Consult with the requestors and provide required info in an accessible format.
19	27(1) (2) (4)	Workplace Emergency Response Information	Ongoing Employees must inform BMP of any disability that requires assistance during emergency. This is included during orientation The consent of the disabled employee will be taken. This will also be incorporated into the orientation of new hires. The individualized workplace emergency response plan will be updated as and when required. This will be reviewed regularly.
20	28(1) & (2)	Documentation – Individualized Accommodation plan	Ongoing. The process and policy is developed.
21	29(1) (2) & (3)	RTW Process	Ongoing. BMP has RTW process and policies that are documented. This will not override other policies and process.
22	30(1)	Performance Management	Ongoing BMP will take consider the accessibility needs of the employees during performance management.

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No	Reference IAS 191/11	Requirement	Status
23	31(1)	Career Development and Advancement	Ongoing The accessibility needs and disabilities of the employees will be considered.
24	32(2)	Redeployment	Ongoing The accessibility needs and disabilities of the employees will be considered.

Accessibility Review

The BMP discusses issues of accessibility and monitors compliance with the requirements of AODA by periodic review of policies and practices at Joint Health and Safety meetings, and or policy reviews conducted by HR Director.

Contact Details

For more information on this accessibility plan, please contact:

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