



Multi-year Accessibility Policy and Plan

Originating Department – Human Resources

TITLE: MULTIYEAR ACCESSIBILITY POLICY AND PLAN	POLICY #
AFFECTED DEPARTMENTS: ALL	APPROVED BY: Jim Rennie
AFFECTED EMPLOYEES: ALL	REVISION DATE: November 30, 2018
DATE: August 3, 2015	

INTRODUCTION:

Algoma Steel Inc. (Algoma) is committed to improving access and opportunity for people with disabilities. This accessibility policy and plan outlines our goals and plans over the next 5 years.

This policy and plan will be reviewed annually and updated as required. Any update report will be posted on our website.

Guiding Legislation

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) ensures accessibility planning is integrated into our operations and business practices.

POLICY:

Statement of Commitment

Algoma is committed to treating all people with dignity, respect and in a way that maintains individual independence. We believe in integration and equal opportunity and are committed to meeting the needs of people with disabilities in a timely manner by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

Algoma supports the full inclusion of persons with a disability as set out in the Ontario Human Rights Code (OHRC) and Accessibility for Ontarians with Disabilities Act, 2005. In that Algoma Steel Inc. ensures compliance with the accessibility requirements in:

- Customer Service
- Information and Communication

- Employment

Algoma strives to ensure every employee receives equitable treatment with respect to employment and services without discrimination.

Algoma meets the accommodation needs of employees in a timely manner as required by the OHRC and the AODA.

Accessible Emergency Information

Algoma is committed to providing customers with disabilities with emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Training

Algoma will provide training to its employees on Ontario's accessibility laws and Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of the employees.

Information and communications

Algoma is committed to meeting the communication needs of people with disabilities. Guidelines in place include:

- Alternative formats are available upon request
- New web content conforms with WCAG 2.0
- Full website in compliance with WCAG 2.0 by January 1, 2021
- Feedback processes are available and accessible to people with disabilities

Employment

Algoma is committed to fair and accessible employment practices. Steps will be implemented to notify the public and staff that, when requested, Algoma will accommodate people with disabilities as required by AODA and Human Rights Standard:

Design of Public Spaces

Algoma will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces.

In the event of a service disruption, we will notify the public of the service disruption and alternative service options available.

MULTI-YEAR ACCESSIBILITY PLAN:

The intent of our Multi-Year Accessibility Plan is to prevent, identify and remove barriers or obstacles that stand in the way of people with disabilities from being able to access our services.

Part 1 – General Requirements

Initiative	Requirement	Action	Status	Compliance Date
Establishment of Accessibility Policies	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.	Policy is approved and posted on our intranet site. .	Complete	January 1, 2014
Accessibility Plans	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 5 years.	Company representative attended Accessibility work shop to learn more about creating a multi-year plan. Multi-year policy/plan is complete and ready to be posted on our internal website. Multi-year policy/plan will be reviewed by senior management at a minimum of once every 5 years.	Complete	January 1, 2014
Training	Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and on the Human Rights Code as it pertains to persons with disabilities to: a) All employees, and volunteers; b) All persons who participate in developing the organization’s policies; and c) All other persons who provide goods, services or facilities on behalf of the organization.	Training video has been prepared. Video has been added to new hire orientation. Video is ready to be delivered to all employees via email and to be posted on our intranet site.	In Progress	January 1, 2015

Part 2 – Information and Communication Standards

Initiative	Requirement	Action	Status	Compliance Date
Feedback	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.	Ensure all requests for feedback in an accessible format is directed to the Communications Department.	Complete	January 1, 2015
Accessible Formats & Communication Supports	<ol style="list-style-type: none"> 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, <ol style="list-style-type: none"> 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. 2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support 3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. 	<p>Ensure applicable staff members know about the requirement to provide communication in an accessible format.</p> <p>Ensure all requests are directed to the Communications Department.</p> <p>The Communications Department will ensure the material is provided in a format suitable for the individual.</p>	Complete	January 1, 2016
Accessible Websites & Web Content	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.	Communication department will ensure any future updates to our website meet the required standard and that our current site complies with the standard by January 2021.	On-going	<p>January 1, 2014 - New web content must meet standard.</p> <p>January 1, 2021 - New and existing web content must meet standard.</p>

Part 3 – Employment Standard

Initiative	Requirement	Action	Status	Compliance Date
General Recruitment	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Statement will be included on all job postings that states "Accommodation is available for applicants with a disability"	Complete	January 1, 2016
Recruitment, Assessment or Selection Process	<p>(1) During the 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>(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>	<p>All candidates are currently contacted through email. A statement will be included in the email that states "Accommodations are available upon request in relation to material and processes used in our recruitment process for applicants with a disability"</p> <p>If accommodation is requested we will meet with the applicant to arrange for a suitable accommodation.</p>	Complete	January 1, 2016
Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	A statement will be included in our job offer templates that states "Algoma Steel Inc. supports the full inclusion of persons with a disability. We have policies in place to address any individual requiring accommodation due to a disability."	Complete	January 1, 2016
Informing Employees of Supports	<p>(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>(2) Employers shall provide the information required under this section to new employees as</p>	<p>Policy will be made available to all employees when posted on our intranet site.</p> <p>Employee training will be added to the new hire orientation.</p> <p>Changes to existing policies will be posted on our</p>	Complete	January 1, 2016

	<p>soon as practicable after they begin their employment.</p> <p>(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>	intranet site.		
Accessible Formats & Communication Supports for Employees	<p>(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,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <p>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Ensure our Communications Department and HR department are aware of this standard and provides information in a format accessible to all employees.	On-going	January 1, 2016
Workplace Emergency Response Information	<p>(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p> <p>(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response</p>	HR department will be made aware of any accommodation due to an employee's disability. The responsible HR Advisor, the employee, the employees department and Emergency Services if required will develop an individualized workplace emergency response plan for that employee.	On-going	January 1, 2012

	<p>information to the person designated by the employer to provide assistance to the employee.</p> <p>(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> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p> <p>(5) Every employer shall meet the requirements of this section by January 1, 2012.</p>	<p>This plan will be communicated to an employee's new department in the event they are transferred.</p> <p>The plan will be reassessed as required.</p> <p>Develop Work Accommodation Checklist to be completed during Job Accommodation Process.</p>		
<p>Documented Individual Accommodation Plans</p>	<p>(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.</p> <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <p>1. The manner in which an employee requesting accommodation can participate in the development of the</p>	<p>All employees requiring accommodation will follow our current processes of processing through our medical department who will complete a "Fitness for Work" form. On the form it will include the employee's accommodation plan.</p>	<p>Complete and On-going</p>	<p>January 1, 2016</p>

	<p>individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
Return to Work	<p>(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for</p>	Current Process will be followed.	Complete	January 1, 2016

	<p>its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p> <p>(2) The return to work process shall,</p> <p>(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; and</p> <p>(b) use documented individual accommodation plans, as described in section 28, as part of the process.</p> <p>(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>			
Performance Management	(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.	Those employees currently part of our Performance Management system will have their annual goals designed to suit their accessibility needs. These goals will be reviewed annually.	On-going	January 1, 2016
Career Development & Advancement	(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.	HR Advisors will take into consideration the accessibility needs of any employee with disabilities when considering an employee for a promotion.	On-going	January 1, 2016
Redeployment	(1) An employer that uses redeployment shall take into	HR Advisors will take into consideration the	On-going	January 1, 2016

	account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	accessibility needs of any employee who may be redeployed within our organization.		
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Source: <http://www.aoda.ca/integrated/>

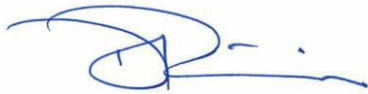
For more information on this accessibility policy and/or plan, or for a copy in an alternative format, please contact:

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This Document is Available in Alternative Formats Upon Request



Vice President – Human Resources

July 26, 2016

Date