

INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) PLAN

The Integrated Accessibility Standards Regulation, 191/11 requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website. Protrans is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. In accordance with the IASR, Protrans Personnel Services Inc.'s Multi-Year accessibility plan outlines the company's comprehensive strategy to prevent and remove barriers to accessibility. This multi-year plan outlines Protrans' strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in Protrans' Accessibility Policies. The plan will be reviewed and updated once every five years and is available in alternate accessible formats upon request. We are committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause Protrans undue hardship.

Initiative	IASR Requirement	Compliance Date	Strategy & Steps	Status/ Comments
Section 3: 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.	Jan 1, 2014	<ul style="list-style-type: none"> • Policies drafted by HR and Safety Manager and reviewed by Director Operations and approved by General Manager • Policy will be available internally on Share point 	Complete
Section 4: Accessibility Plans	Large organizations shall, 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; <ul style="list-style-type: none"> • post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and • review and update the accessibility plan at least once every five years 	Jan 1, 2014	<ul style="list-style-type: none"> • Plan to be drafted by HR and Safety Manager and reviewed by Director Operations and approved by General Manager • Input sought from industry experts, people with disabilities and internal staff • Plan will be available on Protrans website and Share point. HR and Safety manager will review annually and meet reporting requirements when identified 	Complete
	Regularly assess our practices and processes to determine if there are any additional barriers to accessibility in our organization	*No legislated date Protrans selected date of June 30, 2021	<ul style="list-style-type: none"> • Assign an Accessibility Plan Champion to: • Act upon identified barriers in a timely manner • Document additional barriers and identified actions on this Accessibility Plan 	
Section 7: Training	Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> 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.	January 1, 2015	<ul style="list-style-type: none"> • HR and safety Manager reviewed current training to determine whether existing training could be leveraged for training required by the IASR 	Complete
Section 11: 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.	January 1, 2015	<ul style="list-style-type: none"> • Determine all current feedback mechanisms • As needed, update current process for requesting accessible formats – including alternative methods of feedback 	Complete
Section 12: Accessible Formats & Communication Supports	12.1 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.	January 1, 2016	<ul style="list-style-type: none"> • Determine what accessible formats and communication options (verbal/written) will be available. • The person with a disability requesting information will be asked for preferred method of communication and Protrans will deliver as requested or offer an alternative delivery method 	Complete
	12.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	January 1, 2016	<ul style="list-style-type: none"> • Develop a process for responding to, approving or declining a request • Ensure staff know how to offer/determine options (larger font, different colours, read it out loud, etc.) 	Complete
	12.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports	January 1, 2016	<ul style="list-style-type: none"> • Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request • Post on website and reception and possibly print material (invoices, etc.) 	Complete
Section 14: Accessible Websites & Web Content	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	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A January 1, 2021	<ul style="list-style-type: none"> • IT to assess future web functionality to ensure compliance and adequate accessibility features. • Ensure that the vendor understands the requirements under the IASR and utilizes them in practice. 	<ul style="list-style-type: none"> • Will work to meet the compliance deadline by 2021.

Section 22: Recruitment - General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	Jan 1, 2016	<ul style="list-style-type: none"> • Review of all mechanisms for posting positions (website, print) • Incorporate language on postings and website to make applicants (internal/external) aware that accommodation is available in accordance with AODA 	Complete
Section 23: Recruitment, Assessment or Selection Process	<p>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>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>	Jan 1, 2016	<ul style="list-style-type: none"> • Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request • Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA 	Complete
Section 24: Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities	January 1, 2016	<ul style="list-style-type: none"> • Incorporate in offer letter a section regarding Protrans accessibility policies and where to access additional information on Share point for internal staff and Protrans website for placement workers • Update offer letter as per AODA guidelines 	Complete
Section 25: Informing Employees of Supports	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.	January 1, 2016	Develop communication strategy to educate and advise employees on Proturans' accessibility policies, plan and processes	Complete
	25.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	January 1, 2016	Accessibility policies and processes to be incorporated in onboarding process	Complete
	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.	January 1, 2016	Develop process and strategy to communicate any policy changes by email and alternate methods	Complete
Section 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.	January 1, 2016	<ul style="list-style-type: none"> • Educate employees and managers on the availability of accessible format and communication supports; in accordance with AODA 	Complete
	26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	January 1, 2016	Develop a process for consulting with employees to determine accommodation needs	Complete
Section 27: Workplace Emergency Response Information	27.1 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.	January 1, 2016	Develop process to provide employees who request, or for whom Protrans is aware of the need for accommodation due to the employee's disability, to receive individualized workplace emergency response information	Complete
	27. 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 information to the person designated by the employer to provide assistance to the employee.	January 1, 2016	Include a process to obtain consent from the employee to share the information with those designated to provide assistance in the event of an emergency	
	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	January 1, 2016	Upon request, the H&S Rep of that specific branch will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible in consultation with the HR and Safety Manager	
	27.4 Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; (c) when the employer reviews its general emergency response policies.	January 1, 2016	Include a guideline in the process for creating Individualized Workplace Emergency Response Information for when plans and information are to be reviewed due to a move, or change in accommodation needs	
Section 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.	January 1, 2016	Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA	Complete
	28.2 The process for the development of documented individual accommodation plans shall include the following elements:	January 1, 2016	<ul style="list-style-type: none"> • Create a documented individual accommodation process and plan that will incorporate the following elements: 	Complete

	<ol style="list-style-type: none"> 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 or agent. 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. 8. The means of providing the individual accommodation plan in a format that takes into account the employee 's accessibility needs due to disability. 		<ul style="list-style-type: none"> - Manner in which employee can request - Under which circumstances medical assessment is required - Who will be assessing the medical provided (physician or insurance provider) - Work with medical partner to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests - Accommodation Plans will incorporate confidentiality requirements and outline when, to whom, and what information may be shared 	
Section 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.	January 1, 2016	<ul style="list-style-type: none"> •To conduct a review of the current return to work process • Update and document return to work process based on gaps and compliance requirements • Individual training as required. 	Complete
	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; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.			
	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.	January 1, 2016	Ensure that WSIB is not compromised	Complete
Section 30: Performance Management	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.	January 1, 2016	<ul style="list-style-type: none"> • Assess current performance review processes to ensure accessibility features are incorporated (<i>i.e.</i>, forms accessible, conversations in plain language). • Ensure updated/new performance management processes to be rolled out incorporate accessibility features • Ensure training or communications to Managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation 	Complete
Section 31: Career Development & Advancement	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.	January 1, 2016	<ul style="list-style-type: none"> • Review current training and professional development materials to determine accessibility features • To ensure all future developed training and materials are developed with accessibility features in mind • Track career progression of individuals with disabilities 	Complete
Section 32: Redeployment	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.	January 1, 2016	<ul style="list-style-type: none"> • Review and update current transfer and redeployment practices and processes to ensure accommodation plans are referenced • Educate hiring managers to ensure redeployment efforts/activities consider the employee's accommodation needs 	Complete
Section 80: Meet the Accessibility Standards for the Design of Public Spaces when building or making modifications to public spaces	Public spaces applicable to our organization include: a) outdoor paths of travel such as sidewalks, ramps, stairs, curb ramps, off-street parking b) service-related elements such as reception, waiting areas (elaborated in the section 80.41)	January 1, 2017	<ul style="list-style-type: none"> •Identify required steps for IASR compliance •Where possible, incorporate requirements into development contracts with property managers and construction/design managers 	Complete
Section 80.41: Obtaining Service: Service counters	Identify any service counters, waiting rooms, interview and testing rooms in that do not meet accessibility standards and make modifications as reasonable	Jan 1, 2017	<ul style="list-style-type: none"> •Identify required steps for IASR compliance •Where possible, incorporate requirements into development contracts with property managers and construction/design managers 	Complete

