

		CORPORATE POLICY	
SUBJECT	ACCESSIBILITY POLICY	NUMBER	100-20
DEPARTMENT	Corporate	REVISED DATE	
REPLACES POL#		ORIGINAL DATE	February 28, 2014

STATEMENT OF COMMITMENT

Enersource Corporation and its affiliates, including Enersource Hydro Mississauga Inc., collectively “Enersource”, are committed to treating all people in a way that allows them to maintain their dignity and independence. To the greatest extent possible, persons with disabilities will be given an opportunity equal to that given to the broader public, to obtain, use or benefit from the programs, goods and services, information, facilities and employment opportunities provided by and on behalf of Enersource. This commitment extends to customers, employees and the general public with visible or non-visible disabilities.

LEGISLATIVE BACKGROUND INFORMATION

The *Accessibility for Ontarians with Disabilities Act, 2005, c. 11*. (AODA) is a provincial act with the purpose of developing, implementing, and enforcing accessibility standards in order to achieve accessibility for Ontarians with disabilities. The Act establishes accessibility standards in five (5) key areas including: customer service, information and communication, employment, transportation and the built environment.

PURPOSE

This policy is intended to provide the overarching framework to guide the review and development of other corporate policies, standards, procedures and guidelines to comply with the standards developed under the Accessibility for Ontarians with Disabilities Act.

APPLICATION

This Policy applies to all employees, and to any individual or organization that provides programs, services, goods or information to the public or other third parties on behalf of Enersource, in accordance with the legislation.

PRINCIPLES

Enersource programs, services, goods, information, facilities and employment opportunities are to be available to people with disabilities in a manner that:

- is free from discrimination;
- seeks to provide integrated services;
- provides an opportunity equitable to others to obtain, use and benefit from; and,
- takes a person’s disability into consideration.

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ACCESSIBILITY ADVISORY COMMITTEE

Enersource has established an Accessibility Advisory Committee and an Accessibility Working Group. The Advisory Committee shall provide oversight on the requirements and implementation of AODA accessibility standards, preparation of accessibility reports and other matters for which The Working Group may seek advice. The Working Group is responsible for implementing the day-to-day requirements to ensure the Corporation is AODA compliant.

POLICY REQUIREMENTS

GENERAL

Enersource is committed to meeting the accessibility needs of people with disabilities.

ESTABLISHMENT OF ACCESSIBILITY POLICIES AND PLANS

Enersource will provide notice that the documents required by the AODA are available to the public upon request, in the appropriate format or communication support. Notice will be posted in a conspicuous place.

Accessibility Policy statements are prepared in order to be communicated to customers and to anyone else who inquires. The Accessibility Policy and Multi-year Accessibility Plan shall be made available on the corporation’s website on or before April 1, 2014. The Plan will be reviewed and, if necessary, updated at least once every five (5) years.


PROCUREMENT OF GOODS, SERVICES AND FACILITIES

Although not mandated to do so by the legislation, Enersource will provide consideration to integrate accessibility, where required into our procurement processes. When planning for procurement of goods and services, our purchasing department, where practicable, will consider:

- the nature and impact of the barriers that a potential vendor with a disability might face in trying to respond to procurement requests for goods or services; and
- whether or not the goods or services being acquired would be used by employees, vendors, service providers or members of the public with disabilities.

TRAINING

All Enersource employees, as well as those who develop the policies, practices and procedures governing the provision of goods and services, information, facilities and employment opportunities will receive accessibility training that meets Ontario’s accessible laws by January 1, 2015. This training will include information on Ontario’s accessibility laws and the Human Rights Code as it relates to people with disabilities.

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TIMELINE FOR TRAINING

Training will be provided in a way that best suits the duties of employees and other stakeholders and will take place as soon as is practicable after staff and others are assigned the applicable duties. Ongoing training will also occur in respect of any changes to the related policies and procedures.

TRAINING RECORDS

Enersource shall keep records of the training required by this policy, including the number of individuals trained and the dates on which training occurred. The names of individuals trained will be recorded for training administrative purposes.

CONTRACT STAFF AND OTHERS ACTING ON BEHALF OF ENERSOURCE

Commencing January 1, 2015, individuals and other organizations acting on behalf of Enersource must abide by the Accessibility Corporate Policy, Procedures and Practices and fulfill the training requirements outlined above.

All contracts with vendors who interact with customers, employees or the general public on behalf of Enersource, or are involved with developing the policies, procedures and practices that deal with the programs, goods and services, information, facilities and employment opportunities provided by and on behalf of Enersource shall include accessibility training clauses.

INFORMATION AND COMMUNICATION ACCESSIBILITY STANDARDS FEEDBACK

As of January 1, 2015, Enersource will make all of our feedback processes accessible to people with disabilities by:

- arranging for accessible formats and communication supports when requested, and
- notifying the public about the availability of accessible formats and communication supports.

ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS

Except as otherwise provided by the AODA, as of January 1, 2016, Enersource shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports will be provided in a timely manner, taking into account the person’s accessibility needs. If it is determined that information or communications are unconvertible, the department will provide the person requesting the information or communication with:

- a) an explanation as to why the information or communications are unconvertible; and,
- b) a summary of the unconvertible information or communications.



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ACCESSIBLE WEBSITES AND WEB CONTENT

Enersource recognizes that its website is a primary way the organization shares information. Although Enersource’s internet and intranet sites are not new and have not gone through a significant refresh, we strive to create accessible content for all new web pages and to remediate older pages. Enersource shall make their internet websites and web content controlled directly by Enersource, or through a contractual relationship that allows for modification of the product, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

EMERGENCY PROCEDURES, PLANS AND INFORMATION

When requested to do so, Enersource will provide all existing public emergency procedures, plans and public safety information, in an accessible format or with appropriate communication supports in a timely manner.

EMPLOYMENT STANDARDS

Unless otherwise specified, Enersource shall meet the requirements set out in the Employment Standards section of this policy on or before January 1, 2016, in accordance with the schedule set out in the AODA Integrated Accessibility Standards.

RECRUITMENT

Enersource will post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing will be notified that accommodations for material to be used in the process are available, upon request.

If a selected applicant requests an accommodation, Enersource 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. Enersource will notify successful applicants of their policies for accommodating employees with disabilities as part of their offer of employment.

EMPLOYEE SUPPORTS

Enersource will inform employees of the 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. Enersource will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies or the provision of job accommodations that take into account an employee’s accessibility needs due to disability.

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ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES

Upon an employee's request, Enersource will 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.

Enersource will consult with the employee making the request in determining the suitability of an accessible format or communication support.

WORKPLACE EMERGENCY RESPONSE INFORMATION

As of January 1, 2012, if an employee's disability is such that workplace emergency response information is necessary and Enersource is aware of the need for accommodation, this information shall be provided to employees. In addition, with the employee's consent, this information will be provided to the person designated to provide assistance. The information will be reviewed when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed and when Enersource reviews its general emergency response plan.

DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS

A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities in accordance with the legislation.

RETURN TO WORK PROCESS

Enersource shall have in place a documented return to work process for employees returning to work following an absence due to a disability and requiring disability-related accommodations. This return to work process will outline the steps that Enersource will take to facilitate the return to work and use documented individual accommodation plans as part of the process.

PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND REDEPLOYMENT

Enersource shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

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ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT

In accordance with the schedule set out in the AODA Integrated Accessibility Standards, on or after January 1, 2017, Enersource shall comply with the Accessibility Standards for The Built Environment when undertaking new construction and redevelopment of all public spaces including:

- exterior paths of travel;
- accessible parking; and,
- spaces for obtaining services.

RESPONSIBILITIES

The Accessibility Advisory Committee shall provide advice and direction on the implementation of this Policy. The Accessibility Working Group will review this Policy and related procedures and recommend amendments to ensure ongoing compliance with regulated accessibility standards and legislated obligations. Managers and supervisors will ensure that they and their staff are familiar with and comply with this Policy.

POLICY REVIEW

This policy will be reviewed on an annual basis by the appropriate Division/Department and Board, in accordance with the Corporate Policy Process, Number 100-10. However due to legislation or policy, this policy may be reviewed and amended at any time according to current legislation.

MONITORING /CONTRAVENTIONS

Failure to comply with the AODA regulations can result in administrative penalties. Managers and supervisors shall monitor current practices to ensure compliance. Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

MODIFICATIONS TO THIS OR OTHER POLICIES

No changes will be made to this or other policies before considering the effect on persons with disabilities and compatibility with legislation.



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RELATED DOCUMENTS

Related documents pertaining to persons with disabilities can be found in the Enersource Accessible Procedures and Practices.

QUESTIONS ABOUT THIS POLICY

Questions about this policy can be directed to:

Accessibility Office
 Enersource Corporation
 2185 Derry Road West, Mississauga,
 Ontario, L5N 7A6
 Main switchboard: 905-273-9050
 Fax: 905-566-2731
 e-mail:accessibility@enersource.com

REFERENCES

Customer Service Accessibility Standards Corporate Policy No. 100-17
 Accessibility for Ontarians with Disabilities Act, 2005, c. 11.
 Human Rights Code R.S.O. 1990, CHAPTER H.19

APPROVAL LEVELS NEW POLICIES AND REVISIONS

√	Title	Name	Division/Dept.	Signature	Date Approved
	Executive Vice President and CFO	Norman Wolff	Corporate		04/10/2014.
	Executive Vice President & COO	Daniel J. Pastoric	Corporate		14 April '14
	Vice President, Human Resources	Kimberly Boyle	Corporate		25 April /14
	President & CEO	Peter Gregg	Corporate		1 May 14

All policies will be reviewed annually and revised by originating department.



