

## IASR Employment Policy

### Accessibilities for Ontarians with Disabilities Act (AODA, 2005) - Integrated Accessibility Standards Regulation (IASR) Employment Policy

#### Statement of purpose

This policy is intended to meet the requirements of the **Integrated Accessibility Standards, Ontario Regulation 191/11** for the Employment Standard set forth under the **Accessibility for Ontarians with Disabilities Act, 2005**. This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Bonfire Interactive Ltd. (herein referred to as “Bonfire”) shall follow the principles of dignity, independence, integration and equal opportunity.

#### Definitions

Accessible Formats – Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Communication Supports – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Kiosk – An interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

#### General Principles

In accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11, this policy addresses the following:

- A. General Requirements
- B. Recruitment, Assessment and Selection
- C. Accessible Formats and Communication Supports for Employees
- D. Workplace Emergency Response Information
- E. Documented Individual Accommodation Plans
- F. Performance Management and Career Development and Advancement
- G. Return to Work

- H. Redeployment
- I. Review

## **A. General Requirements**

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

### **Establishment of Accessibility Policies and Plans**

Bonfire will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Bonfire will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

Bonfire will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on Bonfire's website.

Bonfire will review and update its accessibility plan once every five (5) years and will establish, review and update Bonfire's accessibility plans in consultation with persons with disabilities or an advisory committee. Progress will be updated on an ongoing basis in our multi-year plan, a living document published on our website.

### **Procuring or Acquiring Goods and Services, or Facilities**

Bonfire will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

### **Training Requirements**

Bonfire will provide training for its employees and volunteers regarding the IASR and the **Ontario Human Rights Code** as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Bonfire's policies, and all other persons who provide goods, services or facilities on behalf of Bonfire

Training will be provided as soon as is reasonably practicable. Training will be provided on an ongoing basis to new employees and as changes to Bonfire's accessibility policies occur.

### **Records**

Bonfire will maintain records on the training provided, when it was provided and the number of employees that were trained.

## **B. Recruitment, Assessment and Selection**

Bonfire will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Bonfire will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Bonfire's policies and supports for accommodating people with disabilities.

### **C. Accessible Formats and Communication Supports for Employees**

Bonfire will ensure that employees are aware of Bonfire's policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Bonfire will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace

Bonfire will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

### **D. Workplace Emergency Response Information**

Where required, Bonfire will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs, or plans are reviewed; and/or
- Bonfire reviews general emergency response policies.

### **E. Documented Individual Accommodation Plans**

Bonfire will ensure that Bonfire's website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

Bonfire must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

The ways in which the employee can participate in the development of the plan;

- The means by which the employee is assessed on an individual basis;

- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

## **F. Performance Management and Career Development and Advancement**

Bonfire will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

*Individual accommodation plans will be consulted, as required.*

## **G. Return to Work**

Bonfire will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Bonfire will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

## **H. Redeployment**

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

*Individual accommodation plans will be consulted, as required.*

## **I. Review**

This policy will be reviewed regularly to ensure that it is reflective of Bonfire's current practices as well as legislative requirements.

## Revision History

Date	Updates
April 21, 2020	Revised
March 20, 2019	Document Created