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# PUG POLICY

<b>Name of Policy:</b> Integrated Accessibility Standards		<b>Responsible Department:</b> Human Resources & Safety
<b>Date Established:</b> August 1, 2014	<b>Approval Date:</b> April 2, 2020	<b>Next Review Date:</b> April 2023

## 1. Purpose and Scope

### a) Purpose

This Policy and its related Practices facilitate compliance with the Integrated Accessibility Standards (IAS), (Ontario Regulation 191/11) of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA), and other relevant sections of that Act, as may be amended from time to time.

Integrated Accessibility Standards break down barriers in the areas of Information and Communication, Employment and Transportation.

PUG 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. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements

### b) Scope

This policy applies to the Peterborough Utilities Group consisting of City of Peterborough Holdings Inc. ("COPHI"), and its subsidiary companies including, Peterborough Distribution Inc. ("PDI"), Peterborough Utilities Inc. ("PUI"), Peterborough Utilities Services Inc. ("PUSI"), PUG Services Corp ("PUGSC"). It also applies to the Peterborough Utilities Commission ("PUC"). For the purpose of this policy the named entities in this scope paragraph are collectively referred to as the "PUG".

## 2. Definitions

**Assistive Device:** a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.

**Barrier(s)** - Obstacles that keep people with disabilities from fully participating in all aspects of society because of their Disability. Examples include attitude, technology, architectural/structural, information and communication.

**Disability** - "Disability" as defined in the Human Rights Code, means:

(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device.

(b) a condition of mental impairment or a developmental disability;

(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;

(d) a mental disorder; or

(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

**Employment Life Cycle** - Processes involved in designing a job, identifying the essential duties, recruiting and hiring a person to do the job, retention of the employee and termination.

**Kiosk** - An interactive electronic terminal, including a point-of-sale device, intended for public use this allows users to access one or more services or products or both.

**Goods, Services or Facilities** - Goods, services or facilities provided by PUG or an agent on behalf of PUG.

**Third Party** - A representative of a business or organization who is receiving or services or acting in an official capacity. Examples include, but are not limited to, vendors or local media.

### 3. Roles and Responsibilities

The Director, Human Resources & Safety is responsible for:

- a) ensuring the employment standards requirements are incorporated into human resources practices and policies and is adhered to;
- b) providing appropriate training with regards to the integrated standards and maintaining training records;
- c) updating the accessibility plan as required, and

- d) completing and submitting all government reporting for compliance purposes.

The Director, Corporate & Customer Service is responsible for;

- a) establishing corporate correspondence standards as required and
- b) providing or arranging for employee training on correspondence standards and maintaining training records.

Managers and supervisors are responsible for providing a work environment free from discrimination and are required to consult with Human Resources if an employee requests accommodation for a disability.

All employees are responsible for following the correspondence standards as set out by the Company.

## 4. Application

### 4.1 General Requirements

#### **Accessibility Plan**

PUG's Multi-Year Accessibility Plan outlines the company's strategy to prevent and remove barriers and address the current and future requirements of the *Accessibility for Ontarians with Disabilities Act (AODA)*, 2005. PUG will report annually on the progress of implementation of the plan and post the plan on the website. Upon request, PUG will provide a copy of the Accessibility Plan in an accessible format.

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

PUG is not required under this legislation to ensure we use accessibility criteria and features when procuring or acquiring goods, services or facilities. We will however take into consideration as much as possible to show our commitment to accessibility.

#### **Training**

PUG will ensure that training is provided to all employees and volunteers and those that develop organizational policies 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. Training will be provided as soon as practicable and will be appropriate to the duties of employees and other persons. Employees will be trained when changes are made to this accessibility policy. Training records will be maintained by the Human Resources & Safety department.

## **4.2 Information and Communications Standard**

### **Accessible Formats and Communication Supports**

Upon request, PUG will provide, or will arrange for provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. PUG will consult with the person making the request in determining the suitability of an accessible format or communication support. PUG will also notify the public about the availability of accessible formats or communication supports.

If PUG determines that it is not feasible to convert the information or communications or the technology to convert the information is not readily available, we will provide the individual with an explanation as to why the information is unconvertible; and a summary of the unconvertible information.

### **Emergency Plans**

If PUG prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

### **Feedback**

We allow a variety of opportunities and methods for our customers to provide feedback to PUG as outlined in Customer Surveys, Feedback, and Suggestions. PUG will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for provision of, accessible formats and communications supports, upon request.

## **4.3 Employment Standard**

### **Recruitment**

PUG will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

PUG will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, PUG 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.

When making offers of employment, PUG will notify the successful applicants of its policies for accommodating employees with disabilities.

PUG will continue to inform its employees of its policies (and any updates of these 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. This information will be provided to new employees as soon as practicable after commencing employment.

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

PUG will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that individualized information is necessary, and if the Company is aware of the need for accommodation due to the employee's disability. PUG will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, PUG will provide the workplace emergency response plan information to the person designated by PUG to provide assistance to the employee. Release of information requires consent of the employee.

PUG will review the individualized workplace emergency response information when the employee moves to a different location in the organization or when the employee's overall accommodations needs or plans are reviewed.

### **Documented Individual Accommodation Plans**

PUG will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided.

### **Return to Work Process**

PUG maintains a documented return to work process for its employees who have been absent from work due to disability and who require disability-related accommodations in order to return to work. The return to work process outlines the steps PUG will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

### **Performance Management, Career Development and Advancement & Redeployment**

PUG will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

#### **4.4 Transportation Standard**

The Transportation Standard requirements of the IAS are not applicable to PUG.

#### **4.5 Built Environment - Design of Public Spaces Standard**

PUG will incorporate accessibility into public spaces that are newly constructed or redeveloped. We will ensure that we follow the requirements stated under the Accessibility Standard for the Built Environment for recreational trails and access routes, outdoor public eating areas, outdoor play spaces, exterior paths of travel, and accessible parking.

We shall provide maintenance and restoration of public spaces by ensuring our multi-year accessibility plan includes procedures for preventative and emergency maintenance of accessible elements in public spaces and procedures for dealing with temporary disruptions when not in working order.

### **5. Applicable Legislation / Reference**

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)  
Integrated Accessibility Standard (Ontario Regulation 191/11)  
Workplace Safety and Insurance Act  
Ontario Human Rights Code

### **6. Training and Compliance**

PUG will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities to:

- all employees
- all persons who participate in developing PUG policies; and
- all other persons who provide goods, services, or facilities on behalf of the company.

The training will be appropriate to the duties of employees and other persons. Employees will be trained when changes are made to the accessibility policy. New employees will be trained as required. PUG will keep a record of the training it provides.

Failure to comply with this Policy or the requirements of the IAS could result in penalties as prescribed in Part V of the IAS. An order may be issued against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the AODA or the accessibility standards.

Individuals who feel their human rights have not been met may continue with the complaint directly to the Ontario Human Rights Commission.

## **7. Appendix / Related Documents / Links**

Multi-Year Accessibility Plan  
Accessible Customer Service Policy  
Recruitment Practice  
Return to Work Practice  
Customer Feedback Form