**Accessibility for Ontarians with Disabilities Act, 2005**

**Integrated Accessibility Standards –Multi-Year Plan and Policy Updates**

**Policy Statement and Commitment**

J.E. Russell Produce Inc. supports the full inclusion of persons with disabilities in our policies, programs, and services. The minimum requirements we meet are contained in the Ontario Human Rights Code, the Ontarians with Disabilities Act (ODA), 2001 and The Accessibility for Ontarians with Disabilities Act (AODA), 2005.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information, communications and employment. The goal is to ensure accessibility for our employees and our customers whom we serve. J.E. Russell Produce Inc. is committed to providing exceptional and accessible service in accordance with AODA for its customers and shall use reasonable efforts to ensure that its policies, procedures and practices are consistent with this commitment and goal.

This policy will be implemented in accordance with the time frames established by the Regulation.

**1. Multi-Year Plan**

**Part I – GENERAL REQUIREMENTS**

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| **Initiative** | **Description** | **Action** | **Compliance Date** |
| Establishment of Accessibility Policies | 3.(1) 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. | Complete | January 1, 2014 |
| Accessibility Plans | 4. (1) 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 meets 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 five years. | Ongoing and will be implemented according to the timeframes set out in our plan.  Complete.  Stakeholders will review once a year. | January 1, 2014 |
| Training | 7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,  a) all employees  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 | Developing learning programs for managers and employees. | January 1, 2014 |

**Part II – Information and Communications Standards**

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| **Initiative** | **Description** | **Action** | **Compliance Date** |
| Feedback | 11.(1) 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. | Feedback processes identified.  Alternative formats will be determined individually, based on needs. | January 1, 2015 |
| Accessible Formats & Communication Supports | 12. (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,  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. | Options will be provided in a timely manner at no additional cost, upon request. | January 1, 2016 |
|  | 12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. | Person requesting accessible formats will be consulted. | January 1, 2016 |
|  | 12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Public is informed of IASR Policy on website | January 1, 2016 |
| Accessible Website & Web Content | 14.(2) 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. | Accessing website and web content. | **After Jan 1, 2014**: New internet websites on those sites must conform with WCAG 2.0 Level A. **Jan 1, 2021:** All internet websites and web content must conform with WCAG 2.0 Level AA |

**Part III – Employment Standard**

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| **Initiative** | **Description** | **Action** | **Compliance Date** |
| Recruitment – General | 22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process | Training hiring managers and posting policy on website. | January 1, 2016 |
| Recruitment, Assessment or Selection Process | 23. (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.  (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 in to account the applicants accessibility needs due to disability. | Training hiring managers and posting policy on website. | January 1, 2016 |
| Notice to Successful Applicants | 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. | Training hiring managers and posting policy on website. | January 1, 2016 |
| 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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
|  | 25. (2) Every employer shall provide the information required under this section to new employees as soon as practicable after they begin their employment. | Employees will be informed through policy circulation and new employee training. | January 1, 2016 |
|  | 25. (3) Every employer shall provide updated information to its employees whenever there is a change of existing policies on the provision of job accommodations that take into account an employee’s accessibility needs due to disability. | Employees will be informed through policy circulation and training. | January 1, 2016 |
| 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. | Employees will be consulted when determining suitable accessible formats for both (a) and (b). | January 1, 2016 |
|  | 26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | Employees will be consulted when determining suitable accessible formats | January 1, 2016 |
| 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. | Forms and processes are complete. | January 1, 2012 |
|  | (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. | Part of process with employee’s consent | January 1, 2012 |
|  | (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. | Information will be provided to employees as soon as the need for accommodation has become known. | January 1, 2012 |
|  | (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; and  (c) when the employer reviews its general emergency response policies | Individualized workplace response information will be reviewed when any change occurs that impacts the employee with the disability. | January 1, 2012 |
| 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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
|  | 28 (2) The process for the development of documented individual accommodation plans shall include the following elements:  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 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.  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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
| 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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
|  | 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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
|  | 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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
| Performance Management | 30.(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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
| Career Development & Advancement | 31.(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. | Employees will be informed through policy circulation and training. | January 1, 2016 |
| Redeployment | 32.(1) 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. | Employees will be informed through policy circulation and training. | January 1, 2016 |

**Part IV – Design of Public Spaces**

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| Service-related elements (like service counters, fixed queuing lines and waiting areas) | Under Review |  | January 1, 2017 |
| Maintenance and restoration of public spaces | Under Review |  | January 1, 2017 |

**2. Policy Updates**

**Part I – JE RUSSELL PRODUCE Inc. – Developing Individual Accommodation Plans for Employees with Disabilities and for Employees with Disabilities on a Return to Work Plan**

JE Russell Produce Inc. is committed to meeting the accommodation needs of our employees and will work with them to remove barriers to accessibility under the requirements of the Accessibility for Ontarians with Disabilities Act.

Whether the disability is a long-term disability, or a return to work instance due to a new disability, it is the responsibility of the employee to bring to the attention of his or her supervisor, HR, or Hutch Morton a request for an Individual Accommodation Plan (IAP) that will serve the disability accommodation. The first step in the process will be to consider, in dialog with the employee, what accommodations must be considered and provided to start the process of creating an Individual Accommodation Plan for that employee. At all times the privacy of the individual accommodation plan will be protected, and only those employees who are required to know about the plan to help develop and facilitate the agreed upon accommodations will be involved.

When the starting point for inclusion of the employee in the accessibility accommodation process has been established, the employee’s request will be evaluated through a review of all available medical professional assessments, and by directly interviewing the employee. We believe that the employee is key to this process and the input and suggestions provided will be valued and considered. An employee can at any point request that a member representing the workers from the JHSC be present in the meetings and participate in the development of the accommodation plan. If an outside consultant is needed to help determine if or how an accommodation solution can be provided, JE Russell will procure and pay for this outside consultant.

After the initial interview and review of medical assessments is made, the company will endeavor to deliver an Individual Accommodation Plan to the worker within 5 business days. If the IAP is agreed upon and accepted by the worker and JE Russell Produce, the company will begin work on implementing that plan immediately. Unless circumstances arise that require a more expedient review, the Individual Accommodation Plan will be reviewed every 90 days with the employee, and any other parties who were a part of the original plan development or are needed as part of the plan facilitation and maintenance.

As was the case at the beginning of the process, the Individual Accommodation Plan will be provided to the employee in the accessible format that works best for him or her.