



AODA Policy Handbook

The policies and documentation contained are intended to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005.

Last Update: December 21, 2023



Table of Contents

Policies

1. Statement of Commitment to Accessibility
2. Definitions
3. Customer Service Policy
4. Employment Policy
5. Information and Communication Policy
6. Customer Emergency Response Plans

Documentation

1. Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation
2. Individual Accommodation Planning Tool
3. Individual Workplace Emergency Response Information Worksheet
4. Sample Customer Service Disruption in Service Notification



**AODA – Statement of
Commitment to Accessibility**

Doc #: HRP-106

Rev #: 2

Effective Date: December 12, 2023

Page #: 1 of 1

BRC Group is committed to providing an accessible environment for all stakeholders, including our clients, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. This commitment is in accordance with *Accessibility for Ontarians with Disabilities Act (2005)*, and its associated standards and regulations.

BRC understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We strive to provide an accessible and welcoming environment for everyone by identifying and removing barriers in our workplace and ensuring that new barriers are not created. We are committed to meeting the needs of persons with disabilities in a timely and integrative manner that respects their dignity and independence to ensure persons with disabilities receive equal opportunities.

In pursuit of this endeavour, BRC Group has established accessibility policies, procedures, equipment requirements, training, and practices. We review these policies and practices annually and as organizational changes occur.

Providing an accessible environment is a shared effort, and we are committed to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact Human Resources.

Sincerely,

Bill Melnik
Owner & CEO



AODA – Policy Definitions

Doc #: HRP-107

Rev #: 2

Effective Date:

December 15, 2023

Page #:

1 of 3

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

Assistive Device – Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Chemical, biological, or radiological incidents –This may include a release of toxic chemicals or other dangerous agents within the vicinity of BRC, including natural gas leaks; the release of harmful bacteria, viruses, or other biological dangers; release of or exposure to radioactive materials.

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.

Conversion Ready– An electronic or digital format that facilitates conversion into an acceptable format.

Disability – The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 co-ordination, 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;
- A condition of mental impairment or a developmental disability;
- A learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.



AODA – Policy Definitions

Doc #: HRP-107

Rev #: 2

Effective Date:

December 15, 2023

Page #:

2 of 3

Fire and/or smoke – Any conflagration (fire) of combustible materials at BRC causing danger of burns from fire or suffocation/choking from smoke inhalation. This can also include fires nearby BRC where there is a clear danger of the fire spreading to BRC or causing the air to become un-breathable due to smoke.

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Natural disaster or severe weather – This is a broad term meaning any emergency caused by inclement weather conditions or tectonic activity. Natural disasters include tornados, floods, earthquakes, mudslides, hurricanes, lightning strikes, avalanches, blizzards, ice storms, severe thunderstorms, and so on. In some cases, natural disaster may also include excessive periods of intensely cold weather, or excessive periods of intensely hot and/or humid weather.

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.

Structural failures – This term encompasses any damage to BRC property or premises that causes unsafe conditions due to structural failure. Failures or pending failures include (but are not limited to) bomb threats, collapsed walls, ceilings, or foundations, burst water mains, electrical power outages, and so on.

Service Animal – an animal is a service animal for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;

- A member of the College of Occupational Therapists of Ontario;
- A member of the College of Optometrists of Ontario;
- A member of the College of Physicians and Surgeons of Ontario;
- A member of the College of Physiotherapists of Ontario;
- A member of the College of Psychologists of Ontario; or
- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

	AODA – Integrated Accessibility Standards Regulation (IASR) Customer Service		Doc #:	HRP-108
			Rev #:	2
	Effective Date:	December 15, 2023	Page #:	1 of 5

Intent

This policy is intended to meet the requirements of the Customer Service Standards included in the Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

All goods and services provided by BRC shall follow the principles of dignity, independence, integration and equal opportunity.

Guidelines

In accordance with the Customer Service Standards, this policy addresses the following:

1. The Provision of Goods and Services to Persons with Disabilities
2. The Use of Assistive Devices
3. The Use of Guide Dogs, Service Animals and Service Dogs
4. The Use of Support Persons
5. Notice of Service Disruptions
6. Customer Feedback
7. Training
8. Notice of Availability and Format of Required Documents

A. The Provision of Goods and Services to Persons with Disabilities

BRC will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality;



**AODA – Integrated
Accessibility Standards
Regulation (IASR) Customer
Service**

Doc #: HRP-108

Rev #: 2

Effective Date:

December 15, 2023

Page #:

2 of 5

- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

B. The Use of Assistive Devices

Customer's Own Assistive Device(s)

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by BRC.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank may involve ensuring the customer is in a location that would be considered safe for both the customer and business.

C. Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law.

Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, BRC may request verification from the customer.

Care and Control of the Animal:

The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies

	AODA – Integrated Accessibility Standards Regulation (IASR) Customer Service		Doc #:	HRP-108
			Rev #:	2
	Effective Date:	December 15, 2023	Page #:	3 of 5

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, BRC will make all reasonable efforts to meet the needs of all individuals.

D. The Use of Support Persons

If a customer with a disability is accompanied by a support person, BRC will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the customer, prior to any conversation where confidential information might be discussed.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of BRC. In the event of any temporary disruptions to facilities or services that customers with disabilities rely on to access or use BRC's goods or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

Notification Options

When disruptions occur BRC will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the BRC website;
- contacting customers with appointments;



**AODA – Integrated
Accessibility Standards
Regulation (IASR) Customer
Service**

Doc #: HRP-108

Rev #: 2

Effective Date:

December 15, 2023

Page #:

4 of 5

- verbally notifying customers when they are making a reservation or appointment; or
- by any other method that may be reasonable under the circumstances.

F. Customer Feedback

BRC shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available by (insert ways in which the process will be publicized). Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback

Customers can submit feedback to by calling 1-877-260-4309.

Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can also do so to any BRC employee.

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

G. Training

Training will be provided to:

- Every person who is an employee of, or a volunteer with, BRC.
- Every person who participates in developing the BRC's policies.
- Every other person who provides goods, services or facilities on behalf of the provider.

Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the Customer Service Standards.

	AODA – Integrated Accessibility Standards Regulation (IASR) Customer Service		Doc #:	HRP-108
			Rev #:	2
	Effective Date:	December 15, 2023	Page #:	5 of 5

- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person (including the handling of admission fees).
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- BRC's policies, procedures and practices pertaining to providing accessible customer service to customers with disabilities.

Record of Training

BRC will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

H. Notice of Availability and Format of Documents

BRC shall notify customers that the documents related to the Customer Service Standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by BRC, the BRC's website and/or any other reasonable method.

Administration

If you have any questions or concerns about this policy or its related procedures please contact Human Resources.

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.



AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

Doc #: HRP-109

Rev #: 2

Effective Date: December 15, 2023

Page #: Page 1 of 4

Intent

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 BRC shall follow the principles of dignity, independence, integration and equal opportunity.

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

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



AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

Doc #: HRP-109

Rev #: 2

Effective Date: December 15, 2023

Page #: Page 2 of 4

BRC 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.

BRC 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 our website.

BRC will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement BRC's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

BRC 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

BRC 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 BRC's policies, and all other persons who provide goods, services or facilities on behalf of BRC.

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 BRC's accessibility policies occur.

Records

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

B. Recruitment, Assessment and Selection

BRC 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, BRC will consult with the applicant and provide or arrange for suitable accommodation.

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

C. Accessible Formats and Communication Supports for Employees



AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

Doc #:	HRP-109
Rev #:	2
Page #:	Page 3 of 4

Effective Date: December 15, 2023

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

If an employee with a disability requests it, BRC 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.

BRC 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, BRC 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
- BRC reviews general emergency response policies.

E. Documented Individual Accommodation Plans

BRC will ensure that our 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.

BRC 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:



AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

Doc #: HRP-109

Rev #: 2

Effective Date: December 15, 2023

Page #: Page 4 of 4

- 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

BRC 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

BRC 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 BRC 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 BRC's current practices as well as legislative requirements.



AODA – Integrated Accessibility Standards Regulation (IASR) Emergency Response Policy

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 1 of 8

Intent

BRC is committed to supporting the welfare of its employees and visitors to the premises. The purpose of the BRC Emergency Response Plan is to ensure human safety, minimize damage to property, and assure rapid and responsive communication to all parties involved. This plan has been created to address, in a coordinated and systematic manner, all types of emergencies affecting BRC.

This plan will establish processes and procedures for appropriate responses to major emergencies, and assign roles and responsibilities for the implementation and execution of the plan in the event of an emergency or catastrophe. The guidelines shown in this plan are intended to keep employees of BRC prepared should BRC premises and/or facilities become unsafe due to calamity.

**This policy is in compliance with Ontario Regulation 191/11 Accessibility for Ontarians with Disabilities Act, 2005.*

Guidelines

In general, BRC employees must report an emergency event immediately to a member of management or other appropriate authority.

Once the emergency has been ascertained, response/assessment teams will be the first to respond to the incident. They will assess the severity of the emergency and communicate immediately with assigned groups as appropriate. Response/assessment teams are composed of at least one person per department to coordinate and instruct co-workers. These teams will coordinate emergency and/or evacuation efforts within their areas of responsibility.

Not all emergencies will require the same level of response. Appropriate responses will be dictated by the severity of the event and its effect on the health and safety of employees, visitors, and property. Only a member of the management team or an appointed designee has the authority to declare a state of emergency for BRC and can activate this plan.

For the purposes of this plan, BRC defines "emergency" as an instance, or combination of instances, of unsafe conditions that pose a threat to people or property, and include: instances of fire and/or smoke; natural disaster/severe weather; chemical, biological or radiological incidents; and structural failures.

Procedure in the event of an emergency:

Sounding the alarm:



AODA – Integrated Accessibility Standards Regulation (IASR) Emergency Response Policy

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 2 of 8

- In the event of the need to evacuate the whole facility the whole facility will be notified via the fire alarm.
- When an emergency situation is restricted to a small area, verbal communication alone may be used for evacuation of the area. The department will go to its assigned gathering area unless instructed to go to an alternate safe location.
- If 911 is called then supervision is to assign and dispatch a person to meet Emergency Services Personnel to guide or direct them to the supervisor at the scene, “gathering / collection” point or other specified location

Designated Gathering Areas:

- In the case of complete plant evacuation Team Members must proceed to their assigned gathering area / muster point
- Visitors, contractors/sub-contractors must follow instructions from their guide or a member of the department they are here to see, and go with those persons to their gathering area
- The department supervisor or designate will conduct a head count at the gathering point to ensure that all personnel have been evacuated.

External Notification:

Depending on the nature of the emergency the department supervisor or designate may need to contact the appropriate emergency service:

- 911 EMS – Ambulance, Fire, Police
- Hydro utility
- Gas utility
- Water utility
- Environmental services
- Ministry of Labour

Internal Notification:

Next depending on the nature of the emergency the department supervisor or designate will contact:

- Call the Plant Manager(s), General Manager, or Human Resources to inform of the emergency
- Call the IT department

Incident Report:

Once the emergency situation has been resolved and everyone is safely back to work an accident / incident investigation must be completed and the required reports, witness statements and so forth collected as may be applicable.



**AODA – Integrated Accessibility
Standards Regulation (IASR)
Emergency Response Policy**

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 3 of 8

Emergency Specific Instructions:

For all types of emergencies requiring evacuation:

- Team Members and Customers (*henceforth referred to as individuals*) will immediately leave their department by their closest exit route and go to their department’s gathering area and remain there until instructed otherwise.
- Individuals may not attempt to return to their lockers to retrieve any personal property until they have been advised it is safe to do so.
- Close doors behind you.
- Following acknowledgement of the “all clear” the supervisor will instruct Individuals to return to the building and resume normal work duties.

Individuals may not re-enter the building/area until the ‘all clear’ has been given by your supervisor or designate.

1. Extreme Weather (Examples: tornado, hurricane, damaging winds, hail, blizzard, flooding, other)

In the case of extreme weather hazards:

- In extreme weather alerts the safest place for individuals is to remain at work and do not attempt to leave to drive home
- If extreme weather requires an evacuation then Team Members are to go to the assigned inside gathering / collection point.
- During extreme weather hazards individuals are NOT be evacuated to the outside
- A safe indoor area is ideally on ground level inside the factory or the department free from vulnerable overhead equipment. If possible in proximity to an emergency exit on the leeward side of the storm.
- If alerted regarding an extreme weather condition impinging upon the plant, the paging system should be used to advise of the warning and ask individuals to make their way to the “safe indoor gathering area” assigned to your department. See supervisor for specifics

2. Fire or explosion

Upon discovery of a fire or explosion:

- If it is a small fire attempt to extinguish the fire using a fire extinguisher.
- If this is not possible, leave the area immediately. Remain calm.
- If you should encounter smoke or fire use an alternate exit.
- Close doors behind you. Ensure stairwell doors are closed.

Notify your supervisor immediately.



**AODA – Integrated Accessibility
Standards Regulation (IASR)
Emergency Response Policy**

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 4 of 8

The supervisor or designate or management may make the decision to evacuate the area or the buildings if the situation is grave and warrants an evacuation. In such circumstance sound the *evacuation alarm* and make announcements accordingly.

3. Power Failure

In the case of power failure:

- Stay calm, stop working and remain where you are. Most power outages tend to be short in duration and our emergency lighting is good for approximately 60 minutes
- If the power outage appears that it will not be short in duration supervisors will direct Team Members to a safe location and lit location
- Utilize the lift trucks to provide lighting near the main exit, as applicable

The Production Managers in consultation with Senior Management will determine if the power outage will be prolonged and whether it will be necessary to cancel the balance of the shift.

4. Workplace Violence

In the case of workplace violence:

- The supervisor will make every effort to isolate the workers and participants directly involved from other individuals.
- Where other individuals may be at risk, the supervisor will separate and isolate those Team Members and evacuate them to a safe location away from the scene and the participants.

If the situation involves physical violence or is escalating the supervisor shall call 911 and ask for EMS Police Services. *Refer to the Workplace Violence Policy and Procedures (HRM-005-POL-1) for details.*

5. Bomb Threat

In the case of a bomb threat:

- Normally bomb threats are conveyed by means of a phone call. Try to keep the caller calm and ask the following questions:
 - Who the caller is?
 - Is he/she a member of an organization?
 - Where is the bomb located?
 - What kind of bomb is it? What does it look like?
 - When is it scheduled to go off?
 - What are their demands?
- Call 911



**AODA – Integrated Accessibility
Standards Regulation (IASR)
Emergency Response Policy**

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 5 of 8

- Ensure site is secured
- Police will provide further instruction or will announce the “All Clear”

6. Chemical Spill

In the case of a chemical spill:

Note: This does not include small spills that staff has been trained to clean up as per MSDS (utilizing all safety precautions and PPE)

- If you see a spill notify supervision and inform them the location and type of emergency
- Supervision will ensure that individuals are safe and are not exposed to potential of hazardous materials
- Prevent spill from entering drain systems
- Call on external emergency assistance as required

Decide if it is necessary to initiate evacuation steps

7. Gas Leak

In the case of a gas leak:

- Natural gas is lighter than air and will rise. Propane is heavier than air. Both have a rotten egg smell.
- Potential for explosion/fire
- DO NOT touch any electrical switches. Leave the area and contact supervision.
- If safe to do so,
 - isolate the source and shut off valve (ensure proper PPE is used)
 - remove all sources of ignition
 - ventilate area of leak or move leaking container to well ventilated area

If source cannot be isolated, initiate an evacuation

8. Medical Emergency

In the case of a medical emergency:

- Any individual who witnesses a serious injury should contact the closest First Aider and Supervisor.
- Individuals who are not a designated First Aider or first aid certified should remain in their department unless otherwise instructed.
 - If in-house first aid is required then a First Aider will provide first aid, complete an expedited report describing the first aid and start or assist with a more detailed Accident Investigation report if applicable.
- If injuries warrant outside medical attention, 911 will be called



AODA – Integrated Accessibility Standards Regulation (IASR) Emergency Response Policy

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 6 of 8

9. Confined Space Entrapment

BRC does not have confined spaces on the premises. If a confined space entrapment were to happen, it would be due to an unprecedented event (such as a sink hole), in case of confined space entrapment:

- Any individual who witnesses confine space entrapment should call for help so that 911 can be called. Explain the nature of the emergency.
- Individuals who are not First Aid certified should remain in their department unless otherwise instructed.
- Communicate with the injured entrant or another entrant in the space and identify the cause and nature of the injury.
- Secure area and ensure that no one enters the confined space until it has been reassessed and deemed safe to enter.

10. Motor Vehicle Incidents

In the case of Motor Vehicle Incidents:

- Any individual who witnesses a motor vehicle incident should contact a certified First Aider as well as contact a member of the senior management team.
- First aid certified staff are to respond ASAP.
 - If in-house first aid is required then a First Aid Certified Team Member will provide first aid, complete an expedited report describing the first aid and start or assist with a more detailed Accident Investigation report if applicable.
- Individuals who are not First Aid certified should remain in their department unless otherwise instructed.
- If injuries warrant outside medical attention, 911 will be called
- If motor vehicle incident happens off company property, 911 will be immediately dispatched
- The company, if possible, will be notified by the Team Member. If not possible, notification will be done through emergency services.

11. Working at Heights Emergencies/Rescue

In the case of working at heights emergencies/rescue:

- The Team Members should immediately call for help
- If able, the worker should prop their feet against available objects to reduce strain as a result of suspension.



AODA – Integrated Accessibility Standards Regulation (IASR) Emergency Response Policy

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 7 of 8

- To reduce the risk of injury, the suspended worker should keep their legs moving to activate blood flow and workers who are assisting should provide support if able using ladders or other supports as appropriate.

If a worker falls and is suspended by a safety harness, the emergency response plan should be initiated as follows:

- All workers in the immediate vicinity of the incident need to stop working. The First Aider team shall be dispatched.
- Emergency services (911) shall be called to ensure medical treatment is on its way and to get assistance with the rescue as needed.
- Isolate the accident zone and its perimeter to limit further exposure and move all non-affected personnel to a safe zone (or direct them to remain where they are).
- Two of the members of the designated First Aider team (one being an operator) will get into the scissor lift and drive the scissor lift to the suspended workers location.
- The scissor lift should be positioned below the suspended worker and the First Aider team should then bring the suspended worker onto the lift. When the worker is safely on the scissor lift, their lanyard can be disconnected and reattached to an appropriate anchor point on the scissor lift. Once rescued, the worker should remain in an upright position (standing or sitting) to limit strain as circulation may become compromised if laid horizontally.
- If fallen worker is injured, begin administering first aid. Drive the scissor lift to a safe area and lower, continuing to provide first aid until emergency response arrives.

Conduct a thorough accident investigation, securing the scene if a fatality or critical injury has occurred. Photographs and documented statements from any witnesses should be taken. All key information such as dates, time, weather and general site conditions should be recorded.

Quarantine all fall-arrest equipment that may have been subjected to fall fatigue effects and/or shock loading for further investigation.

12. External Threats and Pandemic

In the case of External Threats and Pandemic:

- Communicate the possibility of a pandemic with all individuals providing fact sheets or other relevant sources of information of the risk at hand
- Discuss with staff possible health and safety issues, potential for stand down, and leave arrangements if they are ill or need to look after those who are, or who have been “shut out” of childcare and school, etc;
- Use a “communications tree” so that people can keep in touch, including e-mail addresses and contact emergency list



AODA – Integrated Accessibility Standards Regulation (IASR) Emergency Response Policy

Doc #: HRP-111

Rev #: 2

Effective Date: December 19, 2023

Page #: Page 8 of 8

- Ensure communication and resources are posted in each department in the plant and sent out via email to all office Team Members
- Work with public health and WHO notifications and implement appropriate next steps

13. Missing Employee/Visitor Procedure

- Team Members will be directed by their Supervisor or member of management to systematically search the premises, both inside and outside (if safe to do so), including rooms, bathrooms, offices, and other areas.
- Should a search of the premises prove unsuccessful, the response/assessment team member shall notify local law enforcement by calling 911. Give a description of the missing person, or a photograph (if available). The authorities will assume control of the search from this point.
- The family and/or responsible party of the missing person shall also be notified. Explain what is being done to find the missing person and that the local law enforcement has been notified as well.
- All previously contacted persons and law enforcement shall be notified if the missing person turns up due to search, or of their own accord.

Alternative Formats

BRC is dedicated to ensuring the health and safety of all of our employees, volunteers, visitors, customers and guests. As such, we will provide our Emergency Response Plan in a format that takes into consideration individual needs.

It is critical that all of our employees, volunteers, visitors, customers and guests know and understand our Emergency Response Plan, if the information provided to you is unclear or is in a format that prevents you from fully knowing and understanding our process, please contact Human Resources at BRC.

BRC will work with the individual to identify solutions and options that take into consideration their needs. Alternative options include, but are not limited to:

- Enlarged text;
- Braille format;
- Communication support either in person or over the phone;
- Documents provided via email.

If requested, and upon approval by the individual, an Individual Emergency Response and Evacuation will be created.

AODA – Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

Intent

This 2023 – 2028 accessibility plan outlines what steps BRC will take to prevent barriers to accessibility, and to improve opportunities for people with disabilities in accordance with the requirements communicated under the *Integrated Accessibility Standards, Ontario Regulation 191/11*.

Statement of Commitment

BRC believes in equal opportunity and is committed to providing a barrier-free environment that allows all people to maintain their independence and dignity. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

Plan

General Requirements			
Accessibility Requirement:	Establishment of accessibility policies	Compliance Deadline:	Jan. 1, 2014
Current Barriers:	None		
Plan to Meet Requirements:	Write and publish accessibility policies.		
Potential Future Barriers:	Ongoing updates, as required		
Responsible Authority:	David Mead	Results:	Completed
Accessibility Requirement:	Training on IASR and the <i>Human Rights Code</i>	Compliance Deadline:	Jan. 1, 2015
Current Barriers:	None		
Plan to Meet Requirements:	Establish and conduct training to all employees		
Potential Future Barriers:	Ongoing updates and training of new employees as required		
Responsible Authority:	David Mead	Results:	Completed

Information and Communications Standard			
Accessibility Requirement:	Accessible formats and communication supports	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	Ensure BRC provides or arranges for the provision of accessible formats and communication supports, when requested.		

Potential Future Barriers:			
Responsible Authority:	Nicole Chapman	Results:	Completed
Accessibility Requirement:	Accessible websites and web content	Compliance Deadline:	Jan. 1, 2014
Current Barriers:			
Plan to Meet Requirements:	New website was built with AODA web accessibility standards in mind.		
Potential Future Barriers:	Ensure new technology and website updates comply.		
Responsible Authority:	Emily Boland	Results:	Completed

Employment Standard			
Accessibility Requirement:	Recruitment, assessment and selection processes	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	Applicants will be informed that accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, BRC will consult with the applicant and provide or arrange for suitable accommodation. When making offers of employment, BRC will notify the successful applicant of its policies for accommodating employees with disabilities.		
Potential Future Barriers:			
Responsible Authority:	Krystina McKay	Results:	Completed
Accessibility Requirement:	Informing employees of supports	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	<p>BRC will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.</p> <p>BRC will consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Nicole Chapman	Results:	Completed

Accessibility Requirement:	Accessible formats and communication supports for employees	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	<p>If an employee with a disability requests it, BRC will provide or arrange for the provision of accessible formats and communication supports for the following:</p> <ul style="list-style-type: none"> • Information needed in order to perform his/her job; and • Information that is generally available to all employees in the workplace. 		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Nicole Chapman	Results:	Completed
Accessibility Requirement:	Workplace emergency response information	Compliance Deadline:	Jan. 1, 2012
Current Barriers:	None		
Plan to Meet Requirements:	Where required, BRC 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.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Nicole Chapman	Results:	Completed
Accessibility Requirement:	Documented individual accommodation plans	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	BRC will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Krystina McKay	Results:	Completed
Accessibility Requirement:	Return to work process	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	BRC 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.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Krystina McKay	Results:	Completed
Accessibility Requirement:	Performance management process	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	BRC will consider the accessibility needs of employees with disabilities when implementing performance management processes.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Krystina McKay	Results:	Completed
Accessibility Requirement:	Career development and advancement	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	BRC will consider the accessibility needs of employees with disabilities when offering career development or advancement opportunities.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Krystina McKay	Results:	Completed
Accessibility Requirement:	Redeployment	Compliance Deadline:	Jan. 1, 2016
Current Barriers:	None		
Plan to Meet Requirements:	BRC will ensure the accessibility needs of employees with disabilities will be taken into account in the event of redeployment.		
Potential Future Barriers:	Ongoing training for all new employees.		
Responsible Authority:	Nicole Chapman	Results:	Completed



Individual Accommodation Planning Tool

Personal Information	
Full Name:	
Job Title:	
Department:	
Manager's Name:	
Date:	

Supporting Documentation	
<input type="checkbox"/> Yes	<input type="checkbox"/> No
Date Received:	If Applicable, Date to Reassess:

Part 1: List any functional limitations and how it affects different aspects of your role

Limitations:	Job-related tasks/activities affected by limitations	Is this an essential job requirement?

Part 2: Using the information listed above, identify what types of accommodation or support would help accomplish each job task

Which job requirements and related tasks require accommodation? <i>For example: prolonged seated work</i>	What are the objectives of the accommodation (i.e., what must the accommodation do to be successful)? <i>For example: reduce back pain</i>	What accommodation strategies/tools have been selected to facilitate this task/activity? <i>For example: stand for 15 minutes every 45 minutes</i>



Part 3: In the event of a medical emergency (if applicable), outline the Response Plan required below:

Objective: <i>For example: severe allergic reaction</i>	Accommodation: <i>For example: locate and inject EpiPen</i>	Person responsible: <i>For example: First aider</i>

Sources of expert input into the individual accommodation plan (e.g., human resources manager, family doctor, specialists):

Timeline of Accommodation

Date accommodation measures take effect:	
Date accommodation measures end (if applicable):	
If no end date is expected, the next review of this accommodation plan will occur on:	

I, _____, Agree/Deny that I have been actively involved in planning and implementing the above accommodation plan. I, _____, further Agree/Deny to update Human Resources regarding any potential changes to the above accommodation plan according to updating medical documentation.

Employee Signature

Date

Manager Signature

Date



Individual Workplace Emergency Response Information Worksheet

INSTRUCTIONS

The employee with a disability completes this worksheet with his manager to help identify threats to the employee's safety that could arise in an emergency situation. The worksheet is also used to provide suggestions on how to overcome the identified threats.

The information collected is confidential and will be shared only with the employee's consent. He/she does not have to provide details of medical condition or disability—only about the type of help he/she may need in an emergency.

EMPLOYEE INFORMATION

Name:	
Department:	

EMERGENCY CONTACT INFORMATION

Name:	
Telephone Number:	
Email:	
Relationship:	

WORKPLACE LOCATION

1. Where do you work?

Area:

POTENTIAL EMERGENCY RESPONSE BARRIERS

2. Can you read/access our emergency information?

___ Yes

___ No

If not, what would make this information accessible to you? (Use additional sheets as necessary.)

3. Can you see or hear the fire/security alarm signal?

___ Yes

___ No

___ I don't know



If not, what would help you to know the alarm was flashing or ringing? (Use additional sheets as necessary.)

4. Can you activate the fire/security alarm system?

- Yes
- No
- I don't know

If not, what would help you to sound the alarm? (Use additional sheets as necessary.)

5. Can you talk to emergency staff?

- Yes
- No

If not, what would help you to communicate with them? (Use additional sheets as necessary.)

6. Can you use the emergency exits?

- Yes
- No
- I don't know

If not, what would help you to exit the building? (Use additional sheets as necessary.)

7. Does your mobility device fit in the emergency waiting area?

- Yes
- No
- I don't know
- N/A



If not, what would help it fit, or is there a better location? (Use additional sheets as necessary.)

8. Could you find the exit if it were smoky or dark?

- Yes
- No
- I don't know

If not, what would help you to find the exit? (Use additional sheets as necessary.)

9. Can you exit the building by yourself?

- Yes
- No
- I don't know

If not, what would help you to exit? (Use additional sheets as necessary.)

10. Can you get to an emergency evacuation chair by yourself?

- Yes
- No
- I don't know
- N/A

If not, what help do you need? (Use additional sheets as necessary.)



Individualized Employee Emergency Response Information

INSTRUCTIONS

Use the information collected in the worksheet to create an individualized workplace emergency response for each employee with a disability. Modify this form if an employee needs different types of accommodations for different types of emergencies.

All information in this document is confidential and will be shared only with the employee's consent

EMPLOYEE INFORMATION

Name:	
Department:	

EMERGENCY CONTACT INFORMATION

Name:	
Telephone Number:	
Email:	
Relationship:	

WORKPLACE LOCATION

1. Where do you work?

Area:

EMERGENCY ALERTS

[Name of employee] will be informed of an emergency situation by:

___ Existing alarm system

___ Pager device

___ Visual alarm system

___ Co-worker

___ Other (specify): _____

ASSISTANCE METHODS

List types of assistance (e.g., staff assistance or transfer instructions).



EQUIPMENT REQUIRED

List any devices required, where they are stored, and how to use them.

EVACUATION ROUTE AND PROCEDURE

Provide a step-by-step description, beginning from the first sign of an emergency.

ALTERNATIVE EVACUATION ROUTE

EMERGENCY SUPPORT STAFF

The following people have been designated to help [name of employee] in an emergency.

Name	Location and/or contact information	Type of assistance

CONSENT TO SHARE EMERGENCY RESPONSE INFORMATION

I [name of employee] give consent for [name of organization] to share this individualized workplace emergency response information with the individuals listed above, who have been designated to help me in an emergency.

Employee's name Employee's signature Date

Manager's name Manager's signature Date



Sample Customer Service Disruption in Service Notification

Dear Valued Customers,

The (insert services that are unavailable, example: accessible entrance) will be out of service for (insert reason for disruption) from (insert appropriate date) until (if known, insert appropriate date).

The following alternative services and options are available:

- (list options)

We regret any inconvenience this may cause. If you have questions or concerns, please contact (Name, Title, E-mail, telephone).

Thank you for your understanding and patience. We appreciate your business, and look forward to seeing you again soon!

Management