



Accessibility Policy

*ACCESSIBILITY FOR ONTARIANS WITH
DISABILITIES ACT*

conversant[™]

INTELLECTUAL PROPERTY MANAGEMENT



Table of Contents

1.	Preamble	3
2.	Assistive Devices.....	3
3.	Use of Service Animals and Support Persons	3
4.	Communication	3
5.	Emergency Procedures and Public Safety Information	3
6.	Feedback Process.....	4
7.	Notice of Temporary Disruptions.....	4
8.	Accessible Websites and Web Content	4
9.	Accessible Formats and Communication Supports	4
10.	Recruitment Policies.....	4
11.	Training	5
12.	Employment Communication and Information Supports.....	5
13.	Individual Accommodation Plans Policy	6
14.	Workplace Emergency Response Information	6
15.	Performance Management, Career Development and Advancement.....	6
16.	Return to Work Process	6
	<i>Individual Workplace Accommodation Plan</i>	<i>7</i>



Accessibility Policy

1. Preamble

Conversant is committed to welcoming people with disabilities and strives at all times to provide services in a way that respects dignity and independence. We will ensure that persons with disabilities receive services of the same quality that others receive. Where accommodations are required, they will be provided through a consultative approach and in a timely manner.

This Policy has been prepared to meet the compliance requirements of the *Accessibility for Ontarians with Disabilities Act (AODA) Customer Service and Integrated Accessibility Standards* and to articulate what people may expect from Conversant in regard to these standards. It reflects our beliefs and values. This Policy is intended to benefit the full range of persons with disabilities as defined in the Ontario *Human Rights Code*. We believe that whether a person's disability is apparent or not, everyone should be treated with courtesy, made to feel welcome and have their needs respected whenever they interact with a member of our organization.

This Policy should be read together with other policies that affect the provision of services by members of our organization who interact with individuals who wish to obtain, use or benefit from services provided by Conversant.

2. Assistive Devices

Conversant is committed to welcoming persons with disabilities who use assistive devices. These assistive devices are welcome in all areas of our locations that are open to the public or to third parties.

Conversant will work and co-operate with its landlords and facilities managers to identify and remove accessibility barriers from its locations.

Conversant will ensure that employees know how to properly interact with persons who utilize assistive devices in a manner that is respectful of their independence and dignity.

3. Use of Service Animals and Support Persons

Persons with disabilities may bring their service animal into areas of Conversant's locations that are open to the public or to other third parties. We will ensure that all those who interact with the public and third parties on our behalf are trained in how to interact with service animals and support persons.

4. Communication

Conversant will communicate in a way that enables persons with disabilities to use, receive and request our services. Employees and will be trained on how to interact and communicate with persons with various types of disabilities.

5. Emergency Procedures and Public Safety Information

When preparing emergency procedures, plans or public safety information that will be made available to the public, we will provide them in an accessible format or with appropriate communication supports as soon as possible, on request. This will include information relating to emergency fire exits and other evacuation plans at our locations.



Accessibility Policy

6. Feedback Process

The ultimate goal of this Policy is to meet service delivery expectations while responding to the requests of individuals with disabilities. Comments on how well we meet those expectations are welcome, appreciated, and will be solicited on our website. Feedback will be accepted in the following ways:

- By e-mail to accessibility@conversantip.com;
- By telephoning our office at: 613-576-3000;
- By Facsimile at: 613-576-3023; and
- By mail to: Conversant Intellectual Property Management, 515 Legget Drive, Suite 704, Ottawa, ON Canada K2K 3G4.

Privacy will be respected and all feedback will be reviewed for possible action that can be taken to improve our policies and procedures. Feedback received will be redirected to an appropriate contact person. Where possible, complaints will be addressed immediately. However, some complaints may require more effort to address, and must be reviewed for action, possibly involving a number of elements within our organization. Individuals offering feedback can expect acknowledgment within five (5) business days. The acknowledgment will indicate how the matter will be addressed and when the individual will be notified of the outcome. We will follow up on any actions arising from the feedback and the timeframe for implementation will be provided as part of the notification of outcome. Feedback and response will be in a format that is accessible to the complainant.

7. Notice of Temporary Disruptions

Conversant, in conjunction with its landlord and property manager, will provide individuals wishing to access our services with notice in the event of a planned or unexpected disruption in the facilities and services used by persons with disabilities. This notice will include the reason for the disruption, how long the disruption is expected to last and a description of any alternative facilities or services available (where applicable).

The notice will be placed at prominent locations and on our website in the event of an extended delay. Efforts will also be made to contact those who have scheduled appointments to make alternative arrangements if required. This notice will be provided in accessible formats.

8. Accessible Websites and Web Content

Conversant will ensure that all new website content is compliant with WCAG 2.0 Level A requirements as of January 2014.

9. Accessible Formats and Communication Supports

Conversant will ensure that communications it produces for clients and third parties are available in accessible formats on request unless to do so would cause Conversant undue hardship. When an accessible format or communication support is requested, we will consult with the requesting person to determine which format or support is required and endeavour to provide this in a reasonable amount of time and at no additional cost.

10. Recruitment Policies

Conversant will provide notification on its website and in any specific recruitment materials created, that accommodations for persons with disabilities are available during the recruitment process on request. When an individual applicant is selected for an interview, if the applicant requests, Conversant will use its best efforts to



Accessibility Policy

provide accommodations in a manner that takes into account individual needs. When an offer of employment is made, the successful applicant will be informed of Conversant's workplace accommodation policies.

11. Training

Conversant will provide training about the provision of accessible services to all who interact with members of the public and third parties on our behalf. Training will also be provided to every person involved in the development of policies, practices and procedures regarding the provision of our services.

Training will be given as soon as practicable. New employees will receive training shortly after they commence work. Thereafter, everyone will receive training on an ongoing basis and whenever changes are made to relevant policies, practices and procedures. Training will also be provided when individuals are reassigned to positions that involve interaction with the public or third parties. The content of the training will include information on:

- Interacting with persons of a variety of different disabilities;
- Interacting with persons who use assistive devices, service animals and support persons;
- How to use assistive devices the organization has to enable persons with disabilities;
- Assisting those experiencing difficulties accessing our services;
- The *Ontario Human Rights Code* as it relates to persons with disabilities;
- The purpose of the *Accessibility for Ontarians with Disabilities Act*;
- The requirements of the *Customer Service Standard*; and
- The requirements of the *Integrated Accessibility Standard*.

The training will incorporate materials relevant to our industry and information provided through the Ministry of Community and Social Services. A record of this training will be kept on file including the dates on which it was provided and the individuals who received it.

12. Employment Communication and Information Supports

Conversant is actively committed to the principles of equality, diversity and inclusion in the workplace. This includes the establishment of communication practices that ensure that there are no discriminatory barriers that interfere unreasonably with functioning in the workplace.

If an employee requires accessible formats of workplace information necessary to fulfil their job functions or information that is readily available in the workplace, they may make a request to their immediate supervisor who will arrange for their provision in consultation with the employee.

- If an employee requires assistance using emergency procedures in the workplace, the employee is encouraged to bring their concerns to the supervisor. The supervisor will consult with the employee and develop a plan to assist the employee and ensure their safety; and
- If an employee requires further assistance in the workplace due to their disability, they may request an individual workplace accommodation plan with management.

Information disclosed by the employee related to their disability and requests for assistance will be respected and kept confidential.



Accessibility Policy

13. Individual Accommodation Plans Policy

Conversant will support employees with disabilities through the development of individual workplace accommodation plans where it is appropriate to do so. Notification of the availability of such accommodations will be given to all employees. An employee desiring a plan may request an assessment. Once a request is made, the employee will be assessed on an individual basis to determine what accommodations are required and appropriate in the context of their workplace responsibility. Management will consider medical reports from the employee's physicians but may also require that the employee be assessed by a medical practitioner of the organization's choosing. Throughout this process management will maintain confidentiality with respect to the employee's request and only disclose information to other members of the organization when required and with the employee's consent. If a plan is approved, it will be implemented with the assistance of other employees when required. The plan will be reviewed regularly and updated whenever there are material changes to the employee's working or medical conditions. Should the request for a plan be denied, the reasons for this denial will be explained in writing. Full details of this policy are set out below.

14. Workplace Emergency Response Information

Where an employee has a disability and Conversant is aware of his or her need for accommodation, an individualized emergency response plan will be developed for the employee. This will be done as soon as possible and according to the following procedure:

- The employee and his or her supervisor will review current workplace emergency information;
- The employee's supervisor will meet with the employee to discuss the accommodation needs;
- If the assistance of other employees is required, with the employee's consent, they will be involved in the process; and
- Once a plan is developed, it will be reviewed regularly and whenever the employee moves work locations or his or her accommodation needs change.

15. Performance Management, Career Development and Advancement

When assessing an employee's performance and advancement opportunities within the organization, management at Conversant will take into account the accessibility needs of the employee (including an individual accommodation plan if one exists). The employee will be assessed equally and afforded an equal opportunity to benefit from career advancement opportunities.

16. Return to Work Process

When an employee has been absent from work for a reason related to a disability, Conversant will endeavour to accommodate their return to the workplace where possible unless the accommodation causes Conversant undue hardship.

When an employee seeks to return to the workplace after being absent due to a disability, the employee may request accommodation from management. Management will consult with the employee to determine what types of accommodation the employee requires to facilitate his or her return. Where it is possible to accommodate the employee's request, management and the employee will develop an individual workplace accommodation plan (as described below) as part of this process. If the employee is able to return to the workplace, management will remain available to discuss challenges with the employee and may involve other staff members with the consent of the employee.

Individual Workplace Accommodation Plan



Individual Workplace Accommodation Plan

Conversant is actively committed to the principles of equality, diversity and inclusion in the workplace, including the establishment of employment practices that ensure that there are no discriminatory barriers that interfere unreasonably with employment opportunities.

The *Ontario Human Rights Code* defines disability in Section 10(1). The *Code* requires that persons with disabilities be accommodated with respect to employment unless the accommodation causes undue hardship.

Accommodation in employment enables the employee to perform the duties and fulfill the requirements of the job and to participate in training and career development. It means making changes to the work environment to allow for the use of the skills of an employee with a disability in order that the essential requirements of the job may be met.

This policy describes how we will meet our responsibilities with regard to reasonable accommodation. However, it is recognized that for any accommodation to be successful, the person with the disability also has a responsibility to be cooperative in finding an appropriate accommodation.

The purpose of this policy is to:

- Provide a clear statement of the obligations and responsibilities required of Conversant by the *Ontario Human Rights Code*, *AODA* and any other relevant legislation, and inherent in our accommodation process;
- To recognize the obligations of employees in the accommodation process; and
- Provide guidance and standards for the implementation of this policy.

In accordance with these principles, reasonable accommodation will be made on a case by case basis to meet the specific needs of employees and applicants, and systemically to make the organization as a whole accessible to employees and applicants with disabilities. The purpose of reasonable accommodation is to enable a person to perform at least the essential requirements of the job as defined in the job posting and/or job description relating to that job. The organization is not required to create a job or so significantly alter a job as to have a different job in order to accommodate an applicant or an employee.

This policy applies to all employees and applicants for employment who have a disability requiring accommodation.

Accommodation:

An adaptation or adjustment made to enable a person with a disability to perform the essential duties or requirements of the position. The requirement, qualification or factor must be reasonable and bona fide in the circumstances. Examples of accommodation include:

- Workstation and/or minor office modifications;

Individual Workplace Accommodation Plan



- Temporary alternative work;
- Flexible or alternative work schedules; and
- Temporary rehabilitative assignments (return to work).

Essential Requirements:

The core functions of a job, having regard to productivity (both in terms of the amount of work product and the timeliness of the work product) and the importance of any function.

Disability (as defined in the Ontario Human Rights Code Section 10 (1))

- (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 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;
- (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; and
- (d) 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.

POLICY

1. Individualized accommodation plans will be designed, or request, to assist in the inclusion of persons with disabilities into employment activities;
2. Individuals will be accommodated in ways which respect their dignity;
3. Accommodation is to be made only for those disability related needs disclosed by the employee or applicant which impact on employment;
4. Accommodation needs are to be addressed in a way that is consistent with responsible financial management and operational requirements, and does not pose an undue hardship on the organization;
5. Accommodation requirements are determined on person-by-person basis by ensuring that each employee with a disability is considered, assessed and accommodated individually, while maintaining a process that is consistent with the principles of confidentiality and shared responsibility;
6. The accommodation process requires the involvement and co-operation of the employee who requires the accommodation;
7. Conversant may request an independent medical evaluation or other expert assessment to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
8. Employee confidentiality is important to Conversant. All persons involved will keep the requesting employee's information in strict confidence. The individualized accommodation plan will be kept in the employee's confidential file and will not be disclosed without the employee's consent;
9. Individual accommodation plans may include accommodations with respect to communication supports and workplace information in accessible formats;

Individual Workplace Accommodation Plan



10. The plan will address emergency response procedures;
11. If an individual accommodation plan is not appropriate in a given situation, Conversant will inform the employee of the reasons for the denial of their request;
12. If an individual accommodation plan is provided, it will be regularly reviewed and included in any performance evaluations given to the employee; and
13. Conversant is committed to achieving a culture and work environment that is supportive of employees with disabilities.