



# Harbridge + Cross Limited

## Accessibility for Ontario with Disabilities Act Multi-Year Accessibility Plan



**2020**

Version	Issue Date	Department	Draft Developed	Approved
1.0	November, 2018	Safety Department	Health & Safety Manager	Sr. Management
2.0	February, 2020	Safety Department	Health & Safety Manager	Sr. Management



## REFERENCE NOTES:

Accessibility for Ontario with Disability Act Compliance Plan

The Harbridge + Cross AODA plan has been developed in consultation with the following resources:

1. Accessibility for Ontario with Disabilities Act, 2005;
2. (AODA) Workplace Safety and Insurance Act, 1997;
3. Harbridge + Cross Health & Safety Manual, 2019;
4. Royal Bank, 2000.



## TERMS AND DEFINITIONS:

- Accessibility** The term accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.
- Barrier** Barriers are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.
- Disability** Ontario's accessibility law adopts the definition for disability that is in the Ontario Human Rights Code. It defines disability broadly:
- 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,
  - d. a mental disorder, or
  - e. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997."



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## 1.0

## PURPOSE:

Disability impacts the lives of many Ontarians and the numbers of people with disabilities is increasing.

In twenty (20) years, it is expected that one in five Ontarians are likely to have some kind of disability compared with approximately one in seven we experience today. According to a review by the Royal Bank, 2000:

- 10 – 20% of the general population has some form of hearing loss including 50% of people over the age of 65.
- Over 600,000 Canadians have self-identified as having vision loss.
- 6% of people with physical disabilities use a wheelchair.
- 70% of disabilities are often hidden and often forgotten.

Many of our veterans have disabilities. Men and women, who want to carry on their life activities with friends and family, will demand access to do so. It is projected that the older population will double in the next 25 years (*Source: Royal Bank, 2000*).



## 2.0

## STATEMENT OF ORGANIZATIONAL COMMITMENT:

### Statement:

Harbridge + Cross Limited is supportive of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its objective of achieving accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025. We are also committed to the Multi-Year Accessibility Plan. As such, we will be identifying, removing and preventing barriers that clients, employees, and members of the public may face when interacting with Harbridge + Cross Limited.

### Commitment:

The following outlines the organization's vision that all clients, employees and members of the public are provided with a barrier-free environment that supports each individual.

### Overview:

- Ensuring we provide people with disabilities the ability to enter all of Harbridge + Cross Limited's premises and reach their destinations without encountering any barriers;
- People with disabilities receiving the services they require without encountering barriers;
- People with disabilities working without encountering barriers;
- Accessibility being incorporated into Harbridge + Cross policies and practices;
- Ensuring Harbridge + Cross notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes;
- When posting current job opportunities, noting that accommodations will be made available upon request;
- When making offers of employment, notifying the successful applicant of Harbridge + Cross's policies for accommodating employees with disabilities upon request.

The Harbridge + Cross accessibility plan outlines the measures that we will take to identify, remove and prevent barriers to people with disabilities who work at our sites or for members of the public. It will also detail our strategy to ensure compliance with accessibility legislation. This policy is posted on our website to ensure that this plan is available to the public. Also, this policy will be reviewed annually to ensure the contents stay current with updated legislation.

  
\_\_\_\_\_  
Sam Kumar, P. Eng., President  
President

JAN. 2020  
\_\_\_\_\_  
Date



## 3.0

## ROLES & RESPONSIBILITIES:

### Senior Management:

- Review and update the Harbridge + Cross AODA policy and procedures on an annual basis;
- Ensure the AODA plan is in compliance with current legislative requirements;
- Provide staff with training on the Harbridge + Cross AODA plan, policies and procedures;
- Provide employees with support for ongoing accessibility issues or concerns;
- Be sensitive and aware of any workers disability and treat them with respect and dignity.

### Supervisors:

- Provide senior management with assistance in reviewing and revising the Health & Safety Policy statement and AODA plan;
- Provide staff with training on the Harbridge + Cross AODA plan, policies and procedures;
- Identify any areas for improvement and report to Senior management as part of the continuous improvement plan
- Be sensitive and aware of any workers disability and treat them with respect and dignity.

### Field and Office Staff:

- Participate in the Harbridge + Cross training program on the AODA plan, policy and procedures;
- Inform your supervisor of any areas of concern as part of the continuous improvement plan;
- Be sensitive and aware of any workers disability and treat them with respect and dignity.

### Visitors:

- All visitors to a Harbridge + Cross property or construction sites are expected to conduct themselves in a respectful manner and to treat all member with dignity and respect.



## 4.0

## DEFINITION AND LEGISLATIVE REQUIREMENTS:

Harbridge + Cross is committed to follow all applicable guidelines, rules, laws and acts identified in the Occupational Health & Safety Act (OHSA) as well as Municipal, Provincial and Federal requirements. Often, contraventions exist between the Harbridge + Cross company rules and legislative requirements. When this occurs, all parties are to use the “Stricter Rule” which implies the stricter of the rules must be followed.

AODA, 2005, S.O. 2005, c.11

- (2) An accessibility standard shall name or describe the persons or organizations to which it applies.
- (3) An accessibility standard may apply only to a person or organization that,
  - (a) provides goods, services or facilities;
  - (b) employs persons in Ontario;
  - (c) offers accommodation;
  - (d) owns or occupies a building, structure or premises; or
  - (e) is engaged in a prescribed business, activity or undertaking or meets such other requirements as may be prescribed.
- (6) An accessibility standard shall,
  - (a) set out measures, policies, practices or other requirements for the identification and removal of barriers with respect to goods, services, facilities, accommodation, employment, buildings, structures, premises or such other things as may be prescribed, and for the prevention of the erection of such barriers; and
  - (b) require the persons or organizations named or described in the standard to implement those measures, policies, practices or other requirements within the time periods specified in the standard. 2005, c. 11, s. 6 (6).



## 5.0

## CUSTOMER SERVICE STANDARDS:

Harbridge + Cross has had a long-standing commitment to providing accessibility for members and visitors with disabilities. The AODA Customer Service Standard now mandates a requirement to meet the needs of persons with disabilities with clearly defined policies and procedures by January 25th, 2015.

In preparing for the compliance requirements, Harbridge + Cross has made reasonable efforts to ensure that its policies and procedures are consistent with the following principles, as defined by the Customer Service Standard, AODA:

- All goods and services at Harbridge + Cross will be provided in a manner that respects the dignity, independence, integration and equal opportunity of people with disabilities.
- Integration and Equal Opportunity: service is provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable a person with disability to access goods or services. They should not have to make significantly more effort to access or obtain service. They should also not have to accept inconvenience or lesser quality.

## 6.0

## ASSISTIVE DEVICES:

Harbridge + Cross is committed to serving people with disabilities including those who use assistive devices. Assistive devices are devices that are used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations.

### Procedures

Harbridge + Cross will ensure that those members/visitors who use assistive devices are welcome and accommodated as required.



## 7.0

# COMMUNICATING TO INDIVIDUALS WITH A DISABILITY:

### Policy

Harbridge + Cross policies and procedures take a person's disability into account when communicating with the individual. Two-way communications is a process of providing, sending, receiving and understanding information. To communicate in an effective way, Harbridge + Cross considers how the disability affects the way that the person expresses, receives or processes communications. Where possible, Harbridge + Cross may ask the member directly the best way to communicate with him or her.

### Procedures

Harbridge + Cross will use a variety of methods, wherever possible, to make communications more accessible by:

Considering the needs of people with disabilities during the planning stage of services and communication development. Using plain language to make a document easier to read for people with learning disabilities.

- Offering information in alternate formats, on request:
- Hand-written or typed information back and forth;
- Braille;
- Voice amplifiers;
- Printed hand-outs of commonly used information;
- Large print;
- E-mail as an alternate channel to provide accessible communication.



## 8.0

## SERVICE ANIMALS:

### Policy

Harbridge + Cross is committed to welcoming people with disabilities who are accompanied by a trained, accredited service animal. A service animal may accompany a client, employee, visitor or any third party with a disability to all parts of our premises that are open to the public. Service animals may be used for, but not limited to, the following disabilities: vision loss, physical disability, hearing loss, autism, epilepsy etc. Although service animals are most commonly dogs, other service animals could include, but are not limited to, ferrets, monkeys, etc. Harbridge + Cross ensures that all employees are properly trained in how to interact with people with disabilities, who are accompanied by a service animal.

### Procedures

To be considered a service animal under this standard, it must either be readily apparent that the animal is being used because of a person's disability or the person with a disability may be asked to provide a letter from a physician or nurse confirming that it is required because of his or her disability. Harbridge + Cross does enforce a general By-law that does not permit pets on the premises, including the Harbridge + Cross office. Service animals are not pets - they are working animals. They are used by people with disabilities to overcome barriers much like assistive devices such as a cane or a wheelchair.

Guide dogs or other service animals, including service animals in training, are allowed to accompany people with disabilities on Harbridge + Cross premises that are open to the public.

- If the service animal is causing a disturbance or attacks a members/visitor, the person and accompanying service animal may be required to leave the area or Harbridge + Cross premises, first responders maybe notified.
- The owner is responsible to clean up after the service animal

Harbridge + Cross anticipates there will be special situations and is prepared to make every effort to accommodate the circumstances on an individual basis, as they arise with the primary goal of keeping all members, visitors, staff, volunteers and service animals safe.



## 9.0

## SUPPORT PERSONS:

### Policy

Harbridge + Cross is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person is allowed to enter Harbridge + Cross premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on Harbridge + Cross premises.

A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods or services.

### Procedures

The Harbridge + Cross communication department will be responsible for advising as required members/ visitors of any member requiring a support person for assistance.

## 10.0

## TEMPORARY DISRUPTION OF SERVICE:

### Policy

Harbridge + Cross is aware that temporary disruptions of services (daily functions – physical operations) and programs may occur due to reasons that may or may not be within Harbridge + Cross control or knowledge. Harbridge + Cross makes a reasonable effort to provide advance notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that may be available.

### Procedures

The notice is made available for updating all Harbridge + Cross members, the public and other parties using the following networks, as appropriate:

- Telephone recordings
- Temporary signage

In the event of an unexpected disruption and advance notice is not possible. Harbridge + Cross will make every reasonable attempt to provide notice through its communication networks.



## 11.0

## PROCESS TO RECEIVE AND RESPONSE TO FEEDBACK:

### Policy

Harbridge + Cross has a process in place for receiving and responding to feedback about the services that are provided to clients and visitors with disabilities. Harbridge + Cross will provide feedback by arranging for accessible formats and communication supports upon request with the individual.

### Procedures

Individuals with disabilities can offer their feedback in the following ways:

- Harbridge + Cross Safety Hazard Near Miss Report FORMS;
- E-mail and telephone, (re-directed, as required, to the appropriate response employee);
- In writing where correspondence is re-directed to the appropriate response employee;
- In person to the Harbridge + Cross Senior Management.

The member is requested to provide their name and contact information (phone and/or e-mail). Once feedback is received, the following actions are taken to respond.

1. The feedback is directed to the appropriate person for action;
2. The feedback is assessed for appropriate action (Note: The Customer Service Standard does not require a response to be provided for all feedback and will be subject to the nature of the complaint);
3. Members/visitors who provide feedback can expect an answer within (5) five business days.

## 12.0

## TRAINING:

### Policy

Harbridge + Cross provides training to all employees who are involved in the development/approvals of customer service policies and procedures on providing goods and services to clients/visitors with disabilities. Harbridge + Cross ensures that third party and others, who deal with the public, have the required AODA training. The training will consist of the requirements of the accessibility standards and on the *Human Rights Code* which are appropriate to the duties of the employees. All persons will be trained as soon as practicably reasonable. Training is recorded for staff and includes name, date and content. Re-training will be mandatory when new updates to the policies have been made.



## **13.0**

### **MODIFICATION TO THE POLICY:**

Harbridge + Cross reserves the right to update and/or change any of its policy that fails to provide respect or promote dignity and independence of individuals with disabilities and will be modified and/or removed.

## **14.0**

### **COMMUNICATION & POSTING OF DOCUMENTS:**

#### **Policy**

Notices are to be posted, informing the public that the documents required by the Customer Service Standard are available upon request and will be provided in a format that takes a person's disability into account.

#### **Procedures**

Documents are available through the following networks, as required:

- Company website;
- Signage or notice memo;
- Safety Board.

## **15.0**

### **EVALUATION:**

Use of suggestions and feedback will be used to evaluate the effectiveness of the program along with an annual review of all policies to be performed on the (3<sup>rd</sup>) third quarter of each year.

## **16.0**

### **Integrated Accessibility Standards Regulations (IASR):**

When providing information or services to a person with a disability, we at Harbridge + Cross will do so in a manner that takes the person's disability into account. If a person with a disability needs an accessible format, or help to communicate with us, we will work with the person to provide the format or support that will meet their needs – at no additional cost to them. If we are not able to meet the person's particular requirement in a reasonable timeframe, we will inform them and will work with them to determine an alternate method or will provide a summary of the information.



## 17.0

## EMPLOYMENT STANDARDS:

Harbridge + Cross is committed to fair and accessible employment practices. Harbridge + Cross is a respectful, caring, and inclusive workplace. We are committed to championing accessibility, diversity and equal opportunity.

## 18.0

## RECRUITMENT:

Harbridge + Cross will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. Requests for accommodation can be made at any stage of the recruitment process providing the applicant has met the bona-fide requirements for the open position. Applicants need to make their requirements known when contacted by the company. Harbridge + Cross will also ensure that third party recruitment agencies are AODA compliant and are asking if accommodation is required when scheduling interviews on our behalf.

- Job postings and corresponding emails to candidates will notify them of the accommodation available upon request;
- When making an offer of employment, Harbridge + Cross will notify the successful applicant of its accommodation process for employees with disabilities;
- New hires will be oriented on the first day of employment of their ability to seek accommodation for information and communication.



## 19.0

## INDIVIDUAL ACCOMMODATION PLANS:

Harbridge + Cross is committed to accommodating people with disabilities and will use the following process to identify and meet employee accommodation needs.

1. Recognize the need for accommodation – this is based on a request by the employee or identification by the employee’s manager or supervisor.
2. Gather relevant information and assess individual needs – information collected on the employee’s functional ability, not the nature of the employee’s disability manner. This information will only be disclosed to the individual who need it to perform the accommodation process.
3. Write an individual accommodation plan – after identify the most appropriate accommodation (s), the details will be documented in a written plan including:
  - a. What accommodations will be provided.
  - b. How to make information accessible to the employee, including accessible format and communication supports.
  - c. Employee emergency information and/or emergency response plan.
  - d. When the plan will be reviewed and updated.

The Supervisor will give the employee in an accessible format a copy of the individual accommodation plan, or written reasons for denying accommodation.

4. Implement, monitor and update the plan – after implementing the accommodation plan, the employee and supervisor will monitor and review the plan to ensure that it is effective. Formal reviews and updates will take place on a mutually agreed upon time in the employee’s accommodation plan. If accommodation is no longer appropriate, the employee and the manager will reassess the situation (step 2) and update the plan.
  - a. The accommodation plan will also review and update if:
    - i. The employee’s work location or position change
    - ii. The nature of the employee’s disability change.

### **Business Agent Representative:**

An employee may request the participation of a representative from their bargaining agent or union representative in the accommodation plan. In cases where the employee is not represented by a bargaining agent, they may request the participation of a member of the workplace including the Health & Safety representative or a member of the Joint Health & Safety Committee.

### **Evaluation from Medical Expert:**

Harbridge + Cross may have accommodation plan reviewed by an independent medical examination (IME) expert to ensure it meets the needs of the employee. The cost of any (IME) will be the responsible of Harbridge + Cross. The purpose of the (IME) is to evaluate and provide guidance on the accommodation plan including if accommodation can be achieved and if so, how accommodation can be achieved.

### **Confidentially, Protection and Privacy of Information:**

Harbridge + Cross will take strict measures to maintain the protection and confidentiality of all employee’s personal information including details of accommodation plans and accessibility needs. This information will only be available to a select group including Senior management, the employee’s supervisor, bargaining agent and the employee.



19.01

**SAMPLE INDIVIDUAL ACCOMMODATION PLAN**

Confidential when completed.

**Employee Information**

<b>Last Name</b>		<b>First Name</b>	
<b>Title/ Department</b>			
<b>Supervisor Information</b>			
<b>Last Name</b>		<b>First Name</b>	
<b>Title/ Department</b>			
<b>Accommodation</b>		<b>Next Plan</b>	
<b>Start Date (yy/mm/dd)</b>	<b>End Date (yy/mm/dd)</b>	<b>Start Date (yy/mm/dd)</b>	<b>Frequency</b>

**Limitations**

List any functional limitations that the employee experiences, how it affects different aspects of his/her job and if each task is an essential part of the role.

<b>Limitations</b>		
<b>Task/ activities affected</b>		
<b>Essential job requirements</b>	<b>Yes</b>	<b>No</b>

**Accommodations**

Using the list of tasks from the limitations section above, identify what type of accommodations or support would help the employee accomplish the task. List a strategy or tool that will provide that accommodation.

<b>Task</b>
<b>What must the accommodation achieve?</b>
<b>Accommodation strategy</b>

**Implementation**

List the actions required to achieve the accommodation (s) identified in the prior section.

<b>Action</b>	
<b>Assigned to</b>	
<b>Due Date (yy/mm/dd)</b>	<b>Date Completed (yy/mm/dd)</b>



**Information sources**

Identify and include the contact information for any experts consulted when building the plan (e.g. human resources manager, family doctor, specialists, etc.)

<b>Last Name</b>	<b>First Name</b>
<b>Title/ Role</b>	
<b>Email Address</b>	<b>Telephone number</b>

**Related documents**

Attach any additional documents required to support the employee

- Employee emergency plan
- Accessible format of the individual accommodation plan
- What type of accessible format and/or communications support the employee needs?
- Return to work plan
- Others

**Comments/ Notes**

Use this section for any additional information (e.g. details of alternative work arrangement, budget code for accommodation cost, etc.)

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**Signature**

<b>Employee's Signature</b>	Date (yy/mm/dd)
<b>Supervisor's Signature</b>	Date (yy/mm/dd)



## 20.0

## RETURN TO WORK PROGRAM:

This section will highlight the requirements for the Return to Work program, including modified and return to regular duties. The program applies to all Harbridge + Cross members that are injured while performing work for the company. It outlines their responsibility to accept as required modified duties to assist with early integration into the workforce. Additionally, medical documentation may be required to outline the physical limitations of the injured worker in order to minimize risk of re-injury. The goal of the program is to successfully reintroduce an injured worker back to regular duties or reintegration into the labour market. Harbridge + Cross recognizes that the Return to Work program is critical for the workers rehabilitation and is committed to working with the injured worker, healthcare provider, and the Workplace Safety Insurance Board (WSIB) for the ongoing follow-up.

Supervisors will be held accountable for the Health and Safety of workers under their supervision and will provide appropriate work (modified duties) to the injured worker based on common sense restriction, medical advice and cooperation of the worker.

Every worker must protect their own Health and Safety by working in compliance with legislative and the company rules, including complying with the Return to Work Program and make every best effort to reintroduce themselves into the workforce.

Senior Management is committed to providing a safe and healthy work environment to its workers and believes that proper training and communication will achieve this goal. Additionally, this program will be reviewed annually with key stakeholders to ensure it complies with legislative requirements and the Health and Safety of the workforce.

  
\_\_\_\_\_  
Sam Kumar, P. Eng., President

  
\_\_\_\_\_  
Date



20.01

## ROLES AND RESPONSIBILITIES:

### Safety Manager

- Report all work related incidents to WSIB as per Employer's Initial Accident-Reporting Obligations policy within the three (3) business days;
- Liaise with medical practitioners for rehabilitation or return to work plan;
- Liaise with WSIB to convey information regarding workers claims;
- Maintain all WSIB records including claims, return to work programs and communication.

### Senior Management:

- Review the Return to Work process annually and apply any changes to the Health and Safety Manual as required;
- Provide adequate support and resources for all aspects of Safe Return to Work Program;
- Ensure workers are adequately trained on their rights and responsibility with respect to the Return to Work Program and access to modified duties.

### Health & Safety Coordinator:

- Verify that the Site Superintendent has available, modified work for injured or returning to work workers;
- Ensure medical follow-up schedule are adhere to as indicated by the Site Superintendent;
- Follow up with the injured workers status regarding return to work and ability to perform modified work;
- Participate in return to work meetings between the Site Superintendent and the worker to establish written goals and objectives for return to regular duties.

### Superintendent:

- Report all work-related injuries to the Health and Safety Department at Head Office within twenty-four (24) hours of the occurrence;
- Have available modified duties to accommodate injured workers;
- Ensure that modified work is appropriate and will not further injure the worker;
- Participate in return to work meetings with the worker and develop written goals and objectives for return to regular duties;
- Advise the Health & Safety Manager of the availability of the modified duties or transitional work program and provide the required forms;
- Communicate with the injured worker and keep track of all communication;

***Note: Communication to take place on a regular basis in order to determine the status of the worker including the return to regular duties. Keep all communication records.***

- Update the Health and Safety Department and/or Health & Safety Manager with the workers progress, appointment details, modified duties, work status, missed days and anything crucial to monitoring workers recovery time.

### Field and Office Workers:

- Immediately report all injuries to your Supervisor;
- Participate in the Modified Duty Program as required;
- Inform your physician that modified work is available as required;
- Participate in Return to work meetings with your Supervisor and develop written goals and objectives for your Return to Regular duties;
- Ensure that participation and cooperation in other scheduled rehabilitation activities, such as physiotherapy or doctor's appointments, are continued while on modified duty.

***Note: These appointments should be arranged, whenever possible, during non-work hours.***

- Participate as indicated under WSIA document number 22-01-03, A worker who is receiving benefits under the insurance plan, or who is entitled to do so, is required to
- Provide WSIB any information required to adjust the claim.



## LEGISLATION REQUIREMENTS:

Harbridge+ Cross is committed to follow all applicable guidelines, rules, laws and acts identified in the Occupational Health & Safety Act (OHSA) as well as other municipal, provincial and federal requirements. Often time, error may be recorded on report forms, report any inconsistencies to the site Superintendent immediately in order to update records including:

1. Absent from regular work;
2. Earns less than regular pay for regular work (e.g., part-time hours);
3. Requires modified work at less than regular pay;
4. Requires modified work at regular pay for more than seven calendar days following the date of accident;
5. An accident where a worker requires modified work at regular pay for more than seven calendar days, employers should consider that:
  - \* Shift workers, or those on irregular work patterns, may not be scheduled to work on the eighth calendar day. In these cases, the employer must report the accident if the worker requires modified work on the first shift that follows the eighth calendar day.
  - \* A Seven (7) calendar day period is not reset for the injured workers, return to regular work for a brief period followed by return to modified work. In these cases, the requirement to report is based on whether the worker requires modified work after the initial seven calendar days following the date of accident.
  - \* If a worker returns to regular work, but then requires modified work, the employer must report the accident if the worker requires modified work for more than seven calendar days from the date that the modified work began.

Regular follow-up with WSIB will be maintained with the Health & Safety Manager on a regular basis, as determined until the Worker has resumed regular duties.

## 20.03

## THE PROCESS:

Harbridge+ Cross is committed to workers health and safety however, realizes that injuries do occur at the workplace. When a worker is injured it's important that they receive treatment and rehabilitation back into the workforce. This is best achieved through a cooperative effort between the worker and management in developing the Return to Work plan and Re-employment plan. Harbridge+ Cross is committed to accommodate injured workers through early rehabilitation or placement. The Return to Work program outlines the process for an injured worker early and safe reintegration into the workforce.

The Return to Work process is divided into five (5) components:

1. Report of Workplace Injury, (medical treatment required);
2. Communication Plan;
3. WSIB Communication & Reporting Requirements;
4. Return to Work (modified duties);
5. Return to Regular Duties.

The goal is to get an injured worker back to regular duties in the earliest and safety manner.



## Definitions

Modified duties:	An assignment for a specified period and fulfills a necessary job function, appropriate to the workers' skills and level of experience as determined by the Employer, and which the worker can perform without violating any medical restriction as a result of a temporary disability, sickness or injury.
Functional abilities:	Refers to physically able as prescribed by a doctor or other health care professional and indicated on the WSIB Functional Abilities Form (FAF).

## 20.04

## REPORT OF WORKPLACE INJURY:

It is the responsibility of all workers, supervisor, subcontractors and visitors on a project to report injuries as they occur to the site Superintendent. If medical treatment is required, it is the responsibility of the site Superintendent to ensure that the injured person has a copy of the Harbridge + Cross Accident Package (HARBRIDGE + CROSS STAFF ONLY) prior to seeking medical assistance.

It is the responsibility of the site Superintendent to ensure that copies of all accident packages are forward to the Health & Safety Department at head office attention Health & Safety Manager.

The Accident Investigation process may result in one of three options:

1. Return to Regular Duties;
2. Modified Duties;
3. Lost time injury.

### **Return to Regular Duties:**

When an injured worker reviews and signs off on the Return to Regular Duty FORM, it is expected that the worker and can return to regular duties. A copy of the worker's accident package may remain on file should the injury act up in the future or if the worker needs to re-visit the claim.

### **Modified Duties:**

An injured worker may accept modified duties work when they are suffering from an injury. The modified work is designed to accommodate any restrictions until the worker is able to return to Regular duties. In rare cases, a worker may be on Long-Term modified duties in which case, a special meeting between the injured worker, WSIB and Harbridge + Cross may be called to examine any permanent restrictions.

It is the responsibility of the Health & Safety Manager to submit to WSIB a follow up FAF (Functional Ability Form) every two (2) weeks for any and all workers on modified work.

When a worker recovers from the injury and no longer require modified duties, they are to complete the Return to Regular Duty FORM. It is the responsibility of the site Superintendent to submit a copy of the form to the Health & Safety Manager whom will forward it to WSIB and close the claim.

### **Lost Time Injury:**

An injured worker on lost-time may not be at work during the recovery process due to the nature of the injury (for example loss of consciousness). It is expected that as the recovery process improves, the worker will be transitioned to Modified Duties to a final Return to Regular Duties.

### **Appeals Process:**

At any time during the Claim process, both the worker and/or Health & Safety Manager may appeal any WSIB decision. The appeal is first reviewed by the WSIB Hearings Office. A final and binding decision may be reviewed by the WSIAT (Workplace Safety Insurance Appeal Tribunal).

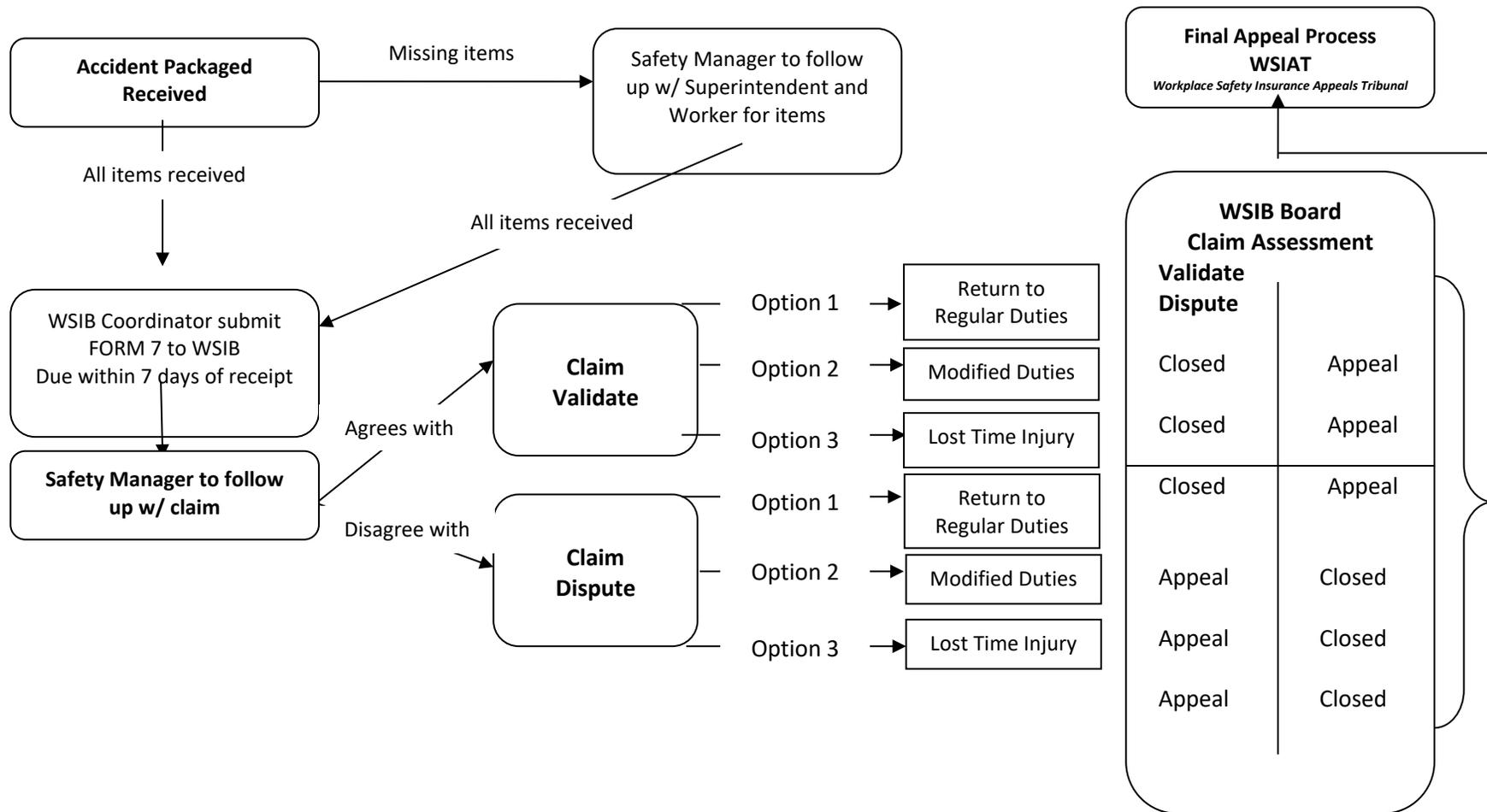


20.05

**COMMUNICATION PLAN:**

Upon receiving a copy of the Accident package form the site Superintendent. It is the responsibility of the Health & Safety Manager to facilitate any and all communication between the injured worker, WSIB and Harbridge + Cross.

The flow chart below outlines the communication channel and decision process.



**WSIB COMMUNICATION &  
REPORTING REQUIREMENTS:**

It is the responsibility of the Health & Safety Department to manage all communication and relationships between WSIB, Harbridge + Cross and the worker. All WSIB correspondents shall be in written format including letter and/or FORM and sent using the following channels:

WSIB FAX  
416-344-4684

WSIB Mail  
200 Front Street West, Toronto,  
Ontario M5V 3J1

WSIB Website Upload  
Wsib.ca/en/onlineservice

Any correspondents, information or letter received by WSIB, Healthcare practisers, the worker, the local union, Harbridge + Cross or any other party member will be filed on the Harbridge + Cross Network J-Drive using the directory:

Jobs (J:) → 1.0 Health & Safety → 2.0 Head Office Folder → 18.0 WSIB → 18.02 WSIB Claims → (YEAR) → Worker's Name

The Health & Safety Department in conjunction with the Accounting Department and site Superintendents shall report as indicated by WSIB form 15-01-02 and FORM 7 all employee accident/incidents/injuries/illness regarding:

1. Absent from regular work;
2. Earns less than regular pay for regular work (e.g., part-time hours);
3. Requires modified work at less than regular pay;
4. Requires modified work at regular pay for more than seven calendar days following the date of accident;
5. An accident where a worker requires modified work at regular pay for more than seven calendar days, employers should consider that:
  - \* Shift workers, or those on irregular work patterns, may not be scheduled to work on the eighth calendar day. In these cases, the employer must report the accident if the worker requires modified work on the first shift that follows the eighth calendar day.
  - \* A Seven (7) calendar day period is not reset for the injured workers, return to regular work for a brief period followed by return to modified work. In these cases, the requirement to report is based on whether the worker requires modified work after the initial seven calendar days following the date of accident.
  - \* If a worker returns to regular work, but then requires modified work, the employer must report the accident if the worker requires modified work for more than seven calendar days from the date that the modified work began.

Regular follow-up with WSIB will be maintained with the Health & Safety Manager on a regular basis, as determined until the Worker has resumed regular duties.

**Additionally, the Safety Department will keep copies of all communication including:**

1. Workers wage change;
2. All expenses related to the Return to Work;
3. Changes in the workers duties;
4. Adjustments to the duration of the RTW program;
5. Failure to cooperate;
6. Miscellaneous correspondence and;
7. Return to full employment/ closeout.



## RETURN TO WORK (MODIFIED DUTIES):

If modified duties have been recommended to an injured worker, it is the responsibility of the Site Superintendent to arrange for appropriate work. Appropriate work is based on the following conditions:

1. Will the modified work be temporary or permanent?
2. Will the work be meaningful and benefit Harbridge + Cross and the worker?
3. Review the restrictions outlined by the physician to determine if the worker's regular duties are within restriction.

Prior to the acceptance of modified duties, the Site Superintendent must review the List of Modified Duties with the worker and develop written goals and objectives that will help the worker return to regular duties. When an amicable series of modified duties have been reached between the worker and Site Superintendent, it is the responsibility of the Site Superintendent to have the worker sign and review the Offer of Modified Duties FORM.

**Note: For WSIB claims, it is the responsibility of the Site Superintendent to review, on a weekly basis, the Return to Work - Modified Duties Follow-Up FORM (18.8) with the worker and to submit a copy to the Health & Safety Manager.**

## RETURN TO REGULAR DUTIES:

Harbridge + Cross, with the assistance of the Site Superintendent, the Worker and (if required) WSIB Return to Work Specialist will help ensure a smooth re-integration of the injured worker into the workplace.

It is the responsibility of the Site Superintendent to ensure that when a worker is qualified to return to regular duties that they sign Regular Duties FORM.

Additionally, the Site Superintendent is also required to:

1. Monitor the condition of the Return to Work worker exercise accident prevention or reoccurrence whenever possible;
2. Advise the worker of any changes to the work area such as additional safety precautions;
3. Maintain communication channels with the worker.



## **21.0**

### **INFORMING EMPLOYEES OF SUPPORT:**

Harbridge + Cross will inform all employees of its AODA policies and any updates to support employees with disabilities. This including policies on the provision of job accommodations that take into account an employee's accessibility needs due to the disability. This information will be provided to new employees in a reasonable time after commencing employment.

## **22.0**

### **ACCESSIBLE FORMATS + COMMUNICATION SUPPORT FOR EMPLOYEES:**

Upon the request of an employee with a disability, Harbridge + Cross will consult with the employee to provide, or arrange for the provision of accessible formats and communication supports for information that is needed to perform his/her job and information that is generally available to other employees. In determining the suitability of an accessible format or communication support, Harbridge + Cross will consult with the employee making the request.

## **23.0**

### **WORKPLACE EMERGENCY RESPONSE INFORMATION:**

Harbridge + Cross will provide individualized workplace emergency response information to employees who have a disability. Harbridge + Cross will provide this information in a reasonable amount of time after becoming aware of the need for accommodation.

Where an employee requires assistance, Harbridge + Cross will, with the consent of the employee, provide the workplace emergency response information to the person designated by the company to provide assistance to the employee.

Harbridge + Cross will review the individualized workplace emergency response information when the employee moves to a different location in the organization, or when the employee's overall accommodation needs or plans are reviewed.

## **24.0**

### **DOCUMENTED INDIVIDUAL ACCOMMODATION PLAN:**

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

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

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



## 25.0

## RETURN TO WORK PROCESS:

Harbridge + Cross will maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work. The return to work process will outline the steps that the company will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e. the *Workplace Safety Insurance Act, 1997*).

## 26.0

## PERFORMANCE MANAGEMENT, CAREER DEVELOPMENT AND ADVANCEMENT & REDEPLOYMENT:

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

## 27.0

## DESIGN OF PUBLIC SPACE STANDARD:

Harbridge + Cross will ensure the design of public spaces will be accessible for all employees or members of the public. Some examples include but not limited to:

- Accessible sidewalks that are free of barriers and wide enough to move around;
- Wider accessible parking spaces for people with mobility limitations;
- Posting of signs.

## 28.0

## MORE INFORMATION & ACCESSIBLE WEBSITE:

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of: information, communications and employment. The format of the accessibility plan and website is available in alternate formats upon request. The Harbridge + Cross website and web content will be entirely accessible by January 1, 2021. Harbridge + Cross will be in compliance with the Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

For more information view the Harbridge + Cross website at: <http://www.harbridgeandcross.com/>

### For additional inquiries contact:

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Vice President	Bill Waters	416-938-0225	<a href="mailto:bwaters@harbridgeandcross.com">bwaters@harbridgeandcross.com</a>