




**HUMAN RESOURCES - CANADA**

**Accessibility Policy and  
Multi-Year Accessibility Plan**

DOCUMENT NUMBER: 01-100CA

VERSION: 022018

EFFECTIVE: 20 February, 2018

	FUNCTION NAME: Human Resources - Canada		
	CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan		
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DOCUMENT / TOOL	REGION (Optional)	TITLE
01-100CA	Canada	Accessibility Policy and Multi-Year Plan

## Accessibility Policy and Multi-Year Accessibility Plan

### 1. Purpose

Under the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), all public and private sector organizations must meet the requirements of accessibility standards established by the Integrated Accessibility Regulation (the “Regulation”). This policy reflects the accessibility standards established by the Regulation in the areas of Employment, Information and Communications, Transportation and Public Spaces for Shire Pharma Canada ULC (the “Company”).

This policy has been drafted in accordance with the Regulation and addresses how the Company strives to achieve accessibility through meeting the Regulation’s requirements.

### 2. Policy Statement and Organizational Commitment

The Company is committed and guided by the four (4) core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the Ontario *Human Rights Code* and the AODA.

The Company shall use every effort to ensure that we comply with our obligations under the Regulation in a timely manner.


### 3. General Provisions

#### ***Accessibility Policy and Multi-Year Accessibility Plan***

This Accessibility Policy and Multi-Year Accessibility Plan outlines a phased-in strategy to comply with the current and future requirements of the AODA and/or the Regulation. The Company will report annually on the progress and implementation of the plan, post the information on our website and will provide it in alternative formats upon request. This Accessibility Policy and Multi-Year Accessibility Plan will be reviewed at least once every five years.

#### ***Training***

The Company will ensure that training is provided to all employees, volunteers, and those that develop the Company’s policies, on the requirements of the Regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements, training will be provided. We shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided. We ensure that others that provide goods, services or facilities on behalf of the organization have had training.

	FUNCTION NAME: Human Resources - Canada		
	CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan		
	DOCUMENT: 01-100CA	VERSION: 022018	EFFECTIVE: 20 February, 2018

#### **4. Information and Communications Standard**

The Company will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities.

If the Company determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, we shall, upon request, provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

##### ***Emergency Information***

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

##### ***Feedback***

The Company has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. We will notify the public about the availability of accessible formats and communication supports.

Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Accessible formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.


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

The Company shall upon request provide or arrange for accessible formats and communication supports for persons with disabilities:

- i. In a timely manner that takes into account the persons' accessibility needs due to a disability;
- ii. At a cost that is no more than the regular cost charged to other persons;
- iii. Consult with the person making the request and determine suitability of an accessible format or communication support; and
- iv. Notify the public about the availability of accessible formats and communication supports.

##### ***Website Accessibility***

After January 1, 2012, the Company shall make any new internet websites and new web content on such a website conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content backdated to 2012 will conform to WCAG 2.0 Level AA.

	FUNCTION NAME: Human Resources - Canada		
	CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan		
	DOCUMENT: 01-100CA	VERSION: 022018	EFFECTIVE: 20 February, 2018

## 5. Employment Standard

The Employment Standard applies to employees and does not apply to volunteers and other non-paid individuals. The requirements of the Employment Standard shall be met by the Company.

### ***Recruitment***

The Company shall notify employees and applicants about the availability of accommodations for applicants with disabilities during the recruitment process and when job applicants are individually selected to participate in an assessment or selection process.

If a selected applicant requests an accommodation, the Company shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability, except where to do so would cause undue hardship.

When making offers of employment, the Company will notify successful applicants of the Company's policies for accommodating employees with disabilities.

### ***Employee Notification***

The Company shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability:

- i. As required to new employees as soon as practicable after they begin their employment; and
- ii. Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

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

In addition and where an employee with a disability requests it, the Company will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:


- i. Information that is needed in order to perform the employee's job; and
- ii. Information that is generally available to employees in the workplace.

The Company will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### ***Individual Accommodation Plan (IAP)***

The Company shall have in place a written process for the development of a documented Individual Accommodation Plan for each employee with a disability in accordance with the following principles:

- i. The employee's participation in the development of the IAP;
- ii. Assessment on an individual basis;

	FUNCTION NAME: Human Resources - Canada		
	CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan		
	DOCUMENT: 01-100CA	VERSION: 022018	EFFECTIVE: 20 February, 2018

- iii. Identification of accommodations to be provided;
- iv. Timelines for the provision of accommodations;
- v. The Company may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- vi. The employee may request the participation of a representative from the workplace in the development of the accommodation plan;
- vii. The Company will take steps to protect the privacy of the employee's personal information;
- viii. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- ix. If denied, the reasons for denial are to be provided to the employee;
- x. A format that takes into account the employee's disability needs;
- xi. If requested, any information regarding accessible formats and communication supports provided; and
- xii. Identification of any other accommodation that is to be provided.

### ***Return to Work***

The Company will have in place a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes will be documented and will outline the steps that the Company will take to facilitate the employee's return to work and include an individual accommodation plan. The Company shall have in place a written process for the development of a documented Individual Accommodation Plan for each employee with a disability in accordance with the following principles:


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

The Company will take into account the accommodation needs and/or individual accommodation plans of employees when:

- i. Using performance management processes;
- ii. Providing career development and advancement information; and
- iii. Using redeployment procedures.

### ***Workplace Emergency Response Information***

The Company shall provide individualized Workplace Emergency Response Information to employees who have a disability:

	FUNCTION NAME: Human Resources - Canada		
	CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan		
	DOCUMENT: 01-100CA	VERSION: 022018	EFFECTIVE: 20 February, 2018

- i. If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability;
- ii. If the employee who receives individual Workplace Emergency Response Information requires assistance and with the employee's consent, the Company shall provide the workplace emergency information to the person designated by the Company to provide assistance to the employee;
- iii. As soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and
- iv. Review the individualized Workplace Emergency Response Information when the employee moves to a different location within the organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.

## 6. Public Spaces

The Company shall incorporate accessibility into the Company's public spaces that are newly constructed or redeveloped on and after January 1, 2017. We will ensure that we follow the requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment). We shall also provide, within our contractual obligations and capabilities, restoration and maintenance of the Company's public spaces by ensuring our Multi-Year Accessibility Plan includes procedures for preventative and emergency maintenance of accessible elements in the Company's public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

## 7. Accessible Customer Service

The Company remains committed to servicing all individuals, including customers with disabilities. The Company will implement an accessible customer services policy, including providing the required training to applicable employees. A copy of this policy will be posted where it is likely to come to the attention of the Company's customers. The Customer Services policy will be provided in a manner that considers the individual's disability, upon request.

## 8. Timeline for Implementation

General Deliverables	Legislated Date for Large Employers
<b>Policies &amp; Procedures</b>	
Implement Customer Service Policy	January 1, 2012
Make Customer Service Policy available to the Public	January 1, 2012
Make Customer Service Policy available in alternative formats upon request	January 1, 2012



FUNCTION NAME: Human Resources - Canada

CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan

DOCUMENT: 01-100CA

VERSION: 022018

EFFECTIVE: 20 February, 2018

Implement Accessibility Policy that includes a Statement of Organizational Commitment	January 1, 2014
Post Accessibility Policy on the Company's website	January 1, 2014
Make Accessibility Policy available in alternative formats upon request	January 1, 2014
<b>Accessibility Plan - Multi Year</b>	
Develop Accessibility Plan	January 1, 2014
Make available to the public	January 1, 2014
Make available in alternative formats upon request	January 1, 2014
Review every 5 years	Ongoing
<b>Training</b>	
Train all applicable employees and contractors in accordance with the Customer Service requirements	January 1, 2012
Train all Ontario employees & volunteers, policy developers, those providing goods or services on behalf of the Company regarding IAS and <i>Human Rights Code</i> .	January 1, 2015
<b>Information &amp; Communications</b>	<b>Legislated Date for Large Employers</b>
<b>Emergency Information</b>	
Emergency Procedure Plans or Public Safety Information are inventoried and accessible upon request	January 1, 2012
<b>Feedback</b>	
Feedback process is in place for receiving and responding to feedback - system is in place and available in accessible formats and with communication supports upon request	January 1, 2015
<b>Accessible formats and communication supports</b>	



FUNCTION NAME: Human Resources - Canada

CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan

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VERSION: 022018

EFFECTIVE: 20 February, 2018

Provide or arrange for accessible formats and communication supports upon request (timely manner, at a cost that is no more than the regular cost charged to other persons)	January 1, 2016
<b>Website Accessibility</b>	
New Internet Website WCAG 2.0 Level AA (other than closed caption Live pre-recorded audio) (where new post-2014)	January 1, 2014*
All internet websites and web content WCAG 2.0 Level AA	January 1, 2021*
Review all content on website up to 2012 to ensure everything is accessible	January 1, 2021*
<b>Employment</b>	<b>Legislated Date for Large Employers</b>
Develop Personalized Workplace Emergency Response for staff, on consent and as necessary	January 1, 2012
Notify employees and public regarding availability of accommodation	January 1, 2016
Notify applicant of availability of accommodation upon request for assessments or selection process	January 1, 2016
Inform employees of policies regarding job accommodations	January 1, 2016
Providing accessible formats and communication supports available to perform job	January 1, 2016
Have a documented IAP process in place	January 1, 2016
Have a Return to Work Process in place	January 1, 2016
Ensure performance management processes take into account accessibility needs	January 1, 2016
Ensure career development and advancement information takes into account accessibility needs	January 1, 2016
Ensure redeployment process takes into account accessibility needs	January 1, 2016





FUNCTION NAME: Human Resources - Canada

CORPORATE POLICY NAME: Accessibility Policy and Multi-Year Plan

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VERSION: 022018

EFFECTIVE: 20 February, 2018

<b>Public Spaces</b>	<b>Legislated Date for Large Employers</b>
<b>Design of Public Spaces</b>	
Incorporate accessibility regulations in accordance with any contracts relating to our premises as required by the Design of Public Spaces Standard for new developments, redevelopments, or when making major changes to existing space or service related elements	January 1, 2017
Maintain and repair public spaces within our premises	January 1, 2017
Develop procedures for preventative and emergency maintenance of accessible elements in public spaces	January 1, 2017
Develop procedures for dealing with temporary disruptions when accessible elements under public spaces not working	January 1, 2017
Incorporate accessibility regulations in designing newly constructed service counters and fixed queuing guides	January 1, 2017

\*Ongoing, as of Effective Date

## 1.0 POLICY SPONSOR, OWNER AND SUBJECT MATTER EXPERTS

**Policy Sponsor:** Eric Tse, General Manager, Shire Canada

**Policy Owner:** Colleen Nunnaro, Head of Human Resources

**Subject Matter Expert:** Colleen Nunnaro, Head of Human Resources; Hanna Suh, Senior Legal Counsel

## 2.0 REVIEW CYCLE AND REVISION HISTORY

VERSION	PUBLISHED DATE	NOTES
022018	20 February, 2018	New Policy