

## WORKPLACE ACCESSIBILITY

### I. PURPOSE

APCA is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing or removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

APCA will ensure that the accessibility requirements under the AODA are adhered to with respect to workplace practices, and all new or existing policies, procedures and processes. Any policy of APCA that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

This policy and AODA Plan shall be available upon request and provided in a format which takes into account the requestor’s disability.

### II. SCOPE

This policy applies to all employees of Astellas Pharma Canada, Inc.

This policy will address the following:

- A. Accessible Emergency Information
- B. Training
- C. Information & Communications
- D. Employment
  - 1. Recruitment
  - 2. Individual Accommodation Plan
  - 3. Performance Management
  - 4. Return to Work Accommodation

### III. DEFINITIONS

Term	Definition
<b>Accessibility for Ontarians with Disabilities Act (AODA):</b>	A law passed by Ontario legislature in 2005, the purpose of which was to develop, implement and enforce accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to customer service, information and communication, employment, transportation and built environment on or before January 1, 2025.
<b>AODA Plan:</b>	A multi-year accessibility plan that outlines the current, ongoing and planned actions of Astellas Pharma Canada, Inc. to ensure equality of opportunity for people with disabilities.

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<b>Disability:</b>	For the purpose of this Policy, disabilities include physical (e.g. blindness), learning (e.g. dyslexia), developmental or intellectual (e.g. Down's Syndrome) or mental health (e.g. anxiety).
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#### IV. POLICY

##### A. Accessible Emergency Information

APCA is committed to providing its customers and clients with publicly available emergency information in an accessible format and/or with appropriate communication support upon request. APCA also provides individualized emergency response information to employees who, for reasons related to their disability, require such information.

##### B. Training

APCA will provide training to Ontario-based employees and volunteers, individuals participating in the development and approval of APCA policies and other staff members as appropriate on the AODA's *Integrated Accessibility Standard* and on the *Ontario Human Rights Code* as it relates to people with disabilities. APCA will ensure that training is provided on any changes to relevant policies on an ongoing basis.

Training will be appropriate to the duties performed by the individual. Training will be provided as soon as practicable after an individual begins working, volunteering or otherwise providing services necessitating training.

APCA will keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

##### C. Information & Communications

APCA is committed to meeting the communication needs of people with disabilities. All requests for public information and/or general information requests will be provided in a timely manner, in an accessible format and/or with communication support as required. We will consult with people with disabilities to determine their information and communication needs as requested or required.

APCA's feedback process allows people with disabilities to provide feedback in a manner that meets their particular needs. APCA will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication support.

More information on APCA's commitment to accessible customer service can be found in the Accessible Customer Service policy.

**D. Employment**

## 1. Recruitment

APCA is committed to fair and accessible employment practices and will ensure that both new and existing recruitment policies, procedures, and processes comply with the applicable legislation.

## 2. Individual Accommodation Plan

APCA will ensure that any employee with a disability, who makes a request to Human Resources, will receive information in a format that is accessible or that provides communication support to the employee. Information for the purpose of this policy includes: (a) information that is required for an employee to do the job for which they were hired; and (b) any other information that is generally available to employees in the workplace.

## 3. Performance Management

APCA will ensure that the accessibility needs of employees with disabilities are taken into account throughout APCA's performance management, career development and redeployment processes.

## 4. Return to Work Accommodation

APCA is committed to returning employees who have been absent from the workplace to work at the earliest opportunity. To do so, APCA has developed the following return to work process:

- An employee who makes a request to return to the workplace after a period of disability will be returned to work (with or without accommodations as necessary) at the earliest opportunity;
- APCA reserves the right to require an employee to provide objective medical information confirming his or her ability to return to work;
- APCA will implement its individualized accommodation plan policy for any employee who requires accommodations upon his or her return to work; and
- APCA will allow the employee to provide input into his or her return to work plan, subject at all times to the right of APCA to request objective medical information in support of a particular request.

5. Privacy

APCA will respect the privacy of employees and ensure that personal information is protected as it relates to workplace accessibility.

**V. REFERENCES**

Accessibility for Ontarians with Disabilities Act, 2005 – O. Reg. 429/07

Ontario Human Rights Code, R.S.O. 1990

Accessible Customer Service policy

**VI. ATTACHMENTS**

- 1 Accessibility for Ontarians with Disabilities Plan – October 2014
- 2 Document Revision History

### **Attachment 1**

#### **Accessibility for Ontarians with Disabilities Plan – October 2014**

This multi-year accessibility plan outlines the current, ongoing and planned actions of Astellas Pharma Canada, Inc. (“APCA”) as it strives to ensure equality of opportunity for people with disabilities.

This plan will be reviewed once every three years. A review will be conducted more frequently in the event of legislative changes or any changes to the work or the workplace that necessitates an earlier review.

Individuals can request a copy of this plan at any time in a format or with communication support that meet the needs of the individual.

#### **Accessible Emergency Information**

APCA is committed to providing its customers and clients with publicly available emergency information in an accessible format and/or with appropriate communication support upon request. APCA provides individualized emergency response information to employees who, for reasons related to their disability, require such information. Information about individualized emergency response information is provided to new employees through the onboarding process.

#### **Training**

APCA will provide training to Ontario-based employees and volunteers, individuals participating in the development and approval of APCA’ policies and other staff members as appropriate on the AODA’s Integrated Accessibility Standard and on the *Ontario Human Rights Code* as it relates to people with disabilities.

APCA will take the following steps to ensure employees are provided with the training needed to meet Ontario’s accessibility laws by **January 1, 2015**:

- By November 2014 a member of the Human Resources department will begin the process of developing appropriate training programs on the AODA and its Integrated Accessibility Standard. Similarly, such individual will review and update existing training programs on the Ontario Human Rights Code as it relates to people with disabilities.
- APCA will begin providing the above-noted training as soon as practicable, and in any event by no later than December, 2014, in order to ensure that all Ontario-based employees have received the necessary training before **January 1, 2015**.
- APCA will ensure that training is provided on any changes to relevant policies on an ongoing basis.

## Information & Communications

APCA is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs as requested or required.

### 1. New & Existing Websites

APCA is aware that effective **January 1, 2014** it has obligations to ensure that new and existing websites meet the accessibility standards required by the AODA. For the purpose of this policy, a “new website” is defined as:

- a) a website with a new domain name, or
- b) a website with an existing domain name undergoing a significant refresh (e.g. more than 50% of its content is updated, whether by content or technological support),

which is created or refreshed on or after **January 1, 2014**.

Further to APCA’s obligations:

- APCA has already instructed its Communications, Information Technology (IT), and Marketing departments as to the requirement to make all new websites and content on those new websites to conform with WCAG 2.0, Level A, and will continue to work closely with these departments to ensure that any new websites and new content on those websites meet this standard.
- APCA will ensure that existing websites and web content will conform with WCAG 2.0, Level AA by **January 1, 2021** and will develop timelines to assist in the conversion of existing websites and web content.

### 2. Feedback Process

APCA will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2015**:

- APCA currently has a feedback program in place for use by the public outlined in the Accessible Customer Service policy. Alternatively, individuals may provide feedback in a manner that meets their particular needs.
- Upon request and in a timely manner, APCA will provide an accessible format and/or communication support to enable an individual with a disability to provide feedback.

- Upon request and in a timely manner, APCA will arrange for its responses to feedback to be provided in an accessible format and/or with necessary communication supports.

### 3. Publically Available Information

APCA will take the following steps to make sure all publicly available information is made accessible to persons with disabilities upon request by **January 1, 2016**:

- APCA will review its existing processes for providing the public with information, to ensure that disabled individuals can also receive such information in a manner that meets their particular needs.
- Upon request and in a timely manner, APCA will provide an accessible format and/or communication support to enable an individual with a disability to receive publicly available information.
- Requested information will be provided in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons.
- APCA will consult with the person making the request to determine the suitability of the accessible format or communication support that is requested.

## Employment

APCA is committed to fair and accessible employment practices and commits to introduce all of the practices below by **January 1, 2016**:

- APCA will ensure that any employee with a disability, who makes a request to Human Resources, will receive information in a format that is accessible or that provides communication support to the employee. Information for the purpose of this policy includes: (a) information that is required for an employee to do the job for which they were hired; and (b) any other information that is generally available to employees in the workplace.
- APCA further commits to undertake any necessary reviews of existing policies, to create new policies, if required, and to revise document templates as necessary (e.g. for job postings, offer letters, etc.) during the year 2015 to ensure that the practices set out below will be in place by **January 1, 2016**.

### 1. Recruitment & Hiring

Further to its objective of creating an inclusive workplace, APCA will take the following steps in respect of its recruitment, assessment and hiring processes:

- APCA will review and, if necessary, modify existing recruitment policies, procedures and processes.
- APCA will ensure that its website and any job postings will specify that accommodation is available for applicants with disabilities during the recruitment and interview/assessment processes.
- APCA will train its staff involved in recruitment and hiring to advise applicants verbally, at the time that they are offered interviews or other assessment processes, that accommodation is available for applicants with disabilities during the interview/assessment processes.
- If an applicant requests accommodation, APCA will consult with the applicant to determine appropriate means of accommodation.
- APCA will include, in offer letters made to successful job candidates, notice of its policies concerning accommodation of employees with disabilities as well as information on where and how to obtain copies of such policies, including in accessible formats.

## **2. Individual Accommodation Plan**

- APCA will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work plans for employees that have been absent due to a disability:
  - APCA will review and, if necessary, modify its existing policies, procedures and processes relating to accommodation of employees with disabilities and ensuring the safe return to work of employees with disabilities.
  - In particular, APCA will modify its existing policies to ensure that they provide for the creation and use of individualized accommodation plans in both the accommodation and return-to-work processes.
  - APCA will ensure that the process for the development of individual accommodation plans includes:
    - a) The manner in which the employee requesting accommodation can participate in the development of the plan;
    - b) The means by which the employee is assessed on an individual basis;
    - c) The manner in which APCA can request an independent medical examination to assist in the accommodation process;
    - d) The steps in place to protect the privacy of the employee's personal information;



- e) The frequency in which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- f) The manner in which the employee will be provided with the reasons for the denial if an individual accommodation plan is denied; and
- g) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs.

### **3. Performance Management**

APCA will take the following steps to ensure the accessibility needs of employees with disabilities needs are taken into account if APCA is using performance management, career development and redeployment processes:

- APCA will review, and if necessary, modify existing policies, procedures and practices relating to performance management, career development and redeployment.
- APCA will take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account in assessments of performance.
- APCA will take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities, including notification of the ability to provide accommodations on internal job postings.
- APCA will take into account the accessibility needs of employees with disabilities when redeploying employees, as that term is understood in the AODA.

### **4. Return to Work Accommodation**

In support of returning employees to work, with or without accommodation, APCA has developed the following process:

- An employee who makes a request to return to the workplace after a period of disability, will be returned to work (with or without accommodation as necessary) at the earliest opportunity;
- APCA reserves the right to require an employee to provide objective medical information confirming his or her ability to return to work;
- APCA will implement its individualized accommodation plan policy for any employee who requires accommodations upon his or her return to work; and

- APCA will allow the employee to provide input into his or her return to work plan, subject at all times to the right of APCA to request objective medical information in support of a particular request.

**More Information**

For more information on this accessibility plan, or to obtain this document in an accessible format, please contact the Human Resources department.

**Attachment 2**  
**Document Revision History**

<b>Version #</b>	<b>Effective Date</b>	<b>Summary of Changes</b>
1	December 1, 2014	New policy.