

KEHOE MARINE CONSTRUCTION ACCESSIBILITY PLAN

Introduction

The Ontario government passed the *Accessibility for Ontarians with Disabilities Act* (AODA) in 2005. Kehoe Marine Construction Ltd. (Kehoe) is committed to complying with the Act and all the standards under it to meet the accessibility needs of persons with disabilities in a timely manner.

The regulations associated with the Integrated Accessibility Standards (ISAR) require that effective September 1, 2023, Kehoe establish, implement, maintain, and document a multi-year accessibility plan which contains the deliverables and activities that will be worked on over the next 5 years.

In accordance with the requirements, Kehoe will:

- Post the plan on its website (www.kehoemarine.com)
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

Multi-Year Accessibility Plan (September 2023 – September 2028)

Part I - General Requirements

Act Section and Description	AODA Compliance Date	Action	Status
<p>3. Establishment of Accessibility Policies</p> <p>3.(1) Every obligated organization shall develop, implement, and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.</p>	January 1, 2014	Kehoe has implemented and communicated an Integrated Accessibility Policy.	Completed

<p>4. Accessibility Plans</p> <p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization 's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	January 1, 2014	<p>Kehoe met the criteria of a "large organization" effective September 1, 2023.</p> <p>Kehoe has since prepared and published an accessibility plan.</p>	Completed
<p>7. Training</p> <p>7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>a) all employees, and volunteers;</p> <p>b) all persons who participate in developing the organization's policies; and</p> <p>c) all other persons who provide goods, services, or facilities on behalf of the organization.</p>	January 1, 2015	<p>Kehoe has a training program in place and trains all required individuals.</p>	Completed

PART II - Information and Communications Standards

Act Section and Description	AODA Compliance Date	Action	Status
<p>11. Feedback</p> <p>11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	January 1, 2015	Kehoe reviews and updates processes for receiving and responding to feedback as required.	Completed
<p>12. Accessible Formats & Communication Supports</p> <p>12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <p>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons</p> <p>12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	January 1, 2016	Kehoe reviews and updates processes for accessibility requests, and evaluates accessible formats and communication supports as required.	Completed

14. Accessible Websites & Web Content 14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	January 1, 2021	Kehoe has assessed its website for current compliance. Kehoe will ensure compliance for new websites; and future compliance requirements for all websites in accordance with the Regulation.	Completed
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PART III - Employment Standard

Act Section and Description	AODA Compliance Date	Action	Status
22. Recruitment – General 22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	January 1, 2016	Kehoe has updated all job posting templates.	Completed
23. Recruitment, Assessment or Selection Process 23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	January 1, 2016	Kehoe notifies job applicants that accommodations are available in relation to the materials or processes used during the recruitment process, upon request.	Completed

(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.			
24. Notice to Successful Applicants 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	January 1, 2016	Kehoe reviews and updates existing recruitment policies and processes as required.	Completed
25. Informing Employees of Supports 25.(1) Every employer 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 disability. 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. 25.(3) Employers shall provide updated information to its employees 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 disability.	January 1, 2016	Kehoe reviews and updates communication, training and orientation processes as required. All employees are notified about Kehoe's accessibility policies and are provided training.	Completed
26. Accessible Formats & Communication Supports for Employees 26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,	January 1, 2016	Kehoe reviews, discusses with, and responds to employee accommodation requests, which include the provision of	Completed

<p>(a) information that is needed in order to perform the employee’s job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <p>26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>		<p>accessible formats and communication supports.</p>	
<p>27. Workplace Emergency Response Information</p> <p>27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, 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.</p> <p>(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee’s consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p> <p>(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee’s disability.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee’s overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>January 1, 2012</p>	<p>Kehoe has reviewed and updated existing processes in place to meet the requirement for individualized workplace emergency response plans.</p>	<p>Complete and ongoing compliance</p>

<p>28. Documented Individual Accommodation Plans</p> <p>28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 	<p>January 1, 2016</p>	<p>Kehoe has existing processes as required.</p>	<p>Completed and ongoing compliance</p>
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<p>29. Return to Work Process</p> <p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p> <p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	January 1, 2016	Kehoe has existing Return to Work Processes in place that meet the requirements of the regulation.	Completed and ongoing compliance
<p>30. Performance Management</p> <p>30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	January 1, 2016	Kehoe has reviewed its existing performance management processes as required.	Completed and ongoing compliance

<p>31. Career Development & Advancement</p> <p>31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<p>January 1, 2016</p>	<p>Kehoe has reviewed its existing Career Development & Advancement processes as required.</p> <p>Kehoe continues to consider accessibility needs during the performance management process and throughout career development and advancement, and/or redeployment.</p>	<p>Completed and ongoing compliance</p>
<p>32. Redeployment</p> <p>32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</p>	<p>January 1, 2016</p>	<p>Kehoe has reviewed and updated its existing redeployment processes as required.</p>	<p>Completed and ongoing compliance</p>

PART IV – Design of Public Spaces Standards (Accessible standards for the Built Environment)

Act Section and Description	Action	AODA Compliance Date	Status
<p>80. Outlines how the organization will construct or redevelop spaces that are accessible to current and potential employees as well as public. Make new or redeveloped:</p> <ul style="list-style-type: none"> Recreational trails and beach access routes accessible Outdoor public use eating areas accessible Outdoor play spaces accessible Exterior paths of travel 80.34 Off-street parking lots accessible 80.40 Service counters, fixed queuing guides and waiting areas with fixed seating accessible Maintain accessible elements of public spaces 	<p>All public areas of Kehoe’s facility are compliant with the requirements.</p> <p>Kehoe will work with any customers or employees requiring assistance or accommodation in the facility.</p>	January 1, 2016	Completed and ongoing compliance

Feedback

We welcome your feedback.

- By telephone to the Human Resources Manager at 613-659-4626
- By email to jessiep@kehoemarine.com

This document is available in an alternate format, upon request.