

**\*\*\*\* For organizations with 50+ employees in Ontario \*\*\***

## **Benmet Steel & Metal Multi-Year Accessibility Plan 2023-2028**

### **Introduction**

Benmet Steel & Metal is a full-service processor of ferrous and non-ferrous metals, centrally located in Guelph, ON. We have remained one of the most established, reputable, independent and trusted processors of recycled metals in Canada for over 50 years.

Benmet Steel & Metal is subject to the provisions of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA); its purpose is to ensure greater accessibility for Ontarians with disabilities. The AODA is Ontario's roadmap to becoming barrier-free by 2025. Under the AODA, Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR) - establishes accessibility standards for:

- Customer service
- Information and communications
- Employment
- Transportation
- Design of Public Spaces

The requirements of AODA and the IASR are not a replacement or a substitution for the requirements established under the Ontario *Human Rights Code*, the *Workplace Safety and Insurance Act, 1997* and the *Occupational Health and Safety Act*.

This Multi-Year Accessibility Plan outlines Benmet Steel & Metal compliance with the AODA, outlines current achievements with regards to accessibility, sets out WWS's upcoming obligations pursuant to the AODA, and identifies how Benmet Steel & Metal will meet those obligations. Benmet Steel & Metal is committed to fulfilling our requirements under the AODA and making its premises and services accessible to all Ontarians.

In accordance with the IASR, Benmet Steel & Metal will:

- report annually on progress in implementing this Plan and our ongoing efforts to prevent and remove barriers by updating this document and posting the updates on the Benmet Steel & Metal website; [www.benmetsteel.com](http://www.benmetsteel.com)
- provide all information relating to this Plan in an alternative format upon request;
- post the Multi-Year Accessibility Plan on the Benmet Steel & Metal website;
- review and update the Plan at least once every five years;
- review and update the Plan in consultation with persons with disabilities;
- prepare an annual status report and post it on the Benmet Steel & Metal website.

### **Statement of Commitment**

Benmet Steel & Metal 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 and are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers and meeting accessibility requirements under the

## **Multi-Year Accessibility Plan 2023-2028 Integrated Accessibility Standard Regulation General**

### **Requirement: Accessibility policy**

Benmet Steel & Metal is committed to maintaining an AODA policy. The policy includes an organizational statement of commitment and requirements for employees at all levels of the organization to meet the accessibility requirements for persons with disabilities in a timely manner.

#### **Actions taken:**

- The AODA policy was reviewed and updated in accordance with internal review processes.
- The AODA policy will be made available in an accessible format to customers requesting a copy of the policy.

#### **Actions planned:**

- Continue to review the AODA policy at least every three years or whenever Benmet Steel & Metal practices and/or procedures change to ensure it is up to date and all AODA requirements are integrated.
- Continue making the AODA policy available in an accessible format to customers requesting a copy of the policy.

### **Requirement: Multi-Year Accessibility Plan**

Benmet Steel & Metal is committed to developing and implementing a Multi-Year Accessibility Plan to meet the requirements of the AODA and the needs of Benmet Steel & Metal stakeholders with disabilities.

#### **Actions taken:**

- A Multi-Year Accessibility Plan was developed in 2023.
- Provide the Plan in an accessible format on request.

#### **Actions planned:**

- Prepare annual status updates on what has been done to achieve accessibility plan, post the update to the website and make the update available to the public in an accessible format if requested.
- Review and update the Multi-Year Accessibility Plan at least every five years based on changing accessibility requirements and feedback from internal and external stakeholders.
- Post updated Plan to the Benmet Steel & Metal website – under redesign, to be posted once completed, anticipated end of Q2 2024.

## **Requirement: Procurement of goods, services or facilities**

Benmet Steel & Metal will incorporate accessibility criteria and features when we procure or acquire goods, services or facilities, where practicable to do so. Upon request, Benmet Steel & Metal will provide an explanation where it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, service or facilities.

### **Actions taken:**

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### **Actions planned:**

- Continue to apply Ontario Government – Accessibility Rules for Procurement
- When tendering for goods, services or facilities, accessibility criteria are included in the request for proposal. – **Add disclaimer on proposals/bids.**

## **Requirement: Training**

Benmet Steel & Metal is committed to providing appropriate AODA training to all employees including Benmet Steel & Metal management, and all people participating in the development and approval of the Benmet Steel & Metal policies. We will also ensure all people who provide goods, services and facilities on Benmet Steel & Metal behalf are appropriately trained.

Training content includes the requirements of AODA, the IASR and the Ontario *Human Rights Code* as it pertains to persons with disabilities.

We will use multiple channels to promote awareness and encourage learning about accessibility.

### **Actions taken:**

- All employees have taken the required AODA training.
- AODA training has been added to the On-Boarding/Orientation process.
- Mandatory training continues to be provided to all new employees.
- All employees, managers and senior managers understand how to interact with customers of varying abilities.
- Organization-wide training compliance check reports are run as needed.
- Organization-wide refresher training is completed and posted on the internal training website.

### **Actions planned:**

- Benmet Steel & Metal will ensure that staff take mandatory AODA training.
- We will institute a refresher training cycle at least every three years or as changes occur (in conjunction with yearly performance plan) to ensure knowledge remains current.
- Employees will be trained on any accommodation equipment or devices as introduced.

# Information and Communications Standards

## **Requirement: Accessible formats and communication supports**

Benmet Steel & Metal is committed to making information and communication accessible to people with disabilities. The information we provide and the ways we communicate are key to delivering our programs and services to the public.

We will incorporate accessibility requirements under the IASR information and communication standard to ensure that its information and communications systems and platforms are accessible and they meet the needs of persons with disabilities. Benmet Steel & Metal will, upon request, consult with the person requesting the information and provide or arrange for the provision of accessible formats and/or communication supports in a timely manner and at a cost that is no more than the regular cost charged to other persons.

There are situations where accessible formats and communication supports may not be provided. These situations include when:

- it is not technically possible to convert a document to an accessible format; in this case, we will explain why and provide a short summary;
- the information comes from another organization;
- we do not control the information;
- the information is found on products or product labels.

If we determine that information or communications are unconvertible, we will provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertible;
- a summary of the unconvertible information or communications.

### **Action taken:**

### **Actions planned:**

- Develop processes to ensure information can be made accessible to people with disabilities upon request.
- Work with employees to create documents that are accessible.
- Continually improve accessibility of our information and communications by reviewing feedback received and conducting accessibility audits to identify accessibility barriers and striving for barrier removal.
- Continue to use the accessible feedback and request mechanism as a means for enabling people with disabilities to request accessible formats or communication supports.
- Ensure that Benmet Steel & Metal letters are designed and conform to accessibility criteria.
- Implement accessible customer service feedback process.

## **Requirement: Accessible websites and web content**

External-facing websites and web content controlled directly by Benmet Steel & Metal will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the IASR. We will also consider conforming to WCAG 2.0 Level A and Level AA standards for our intranet site. This will improve inclusion and provide employees using adaptive technologies with better access to information.

### **Actions taken:**

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### **Actions planned:**

- Create processes and guidance documents to ensure information posted on our website is accessible.
- Conduct web accessibility audits on all existing web content in order to determine if AODA requirements are met and develop remediation plan if content does not conform to the requirements.
- Ensure forms are designed and conform with accessibility criteria.
- Benmet Steel & Metal website and web content posted by end of Q2 2024 and meets WCAG 2.0 Level A.

## **Requirement: Emergency procedures, plans or public safety information**

Safety is a priority for Benmet Steel & Metal and we strive to ensure that our facilities are safe for customers, visitors and employees. The Property Management companies at Benmet Steel & Metal leased facilities have accountability to prepare building related emergency procedures, plans or public safety information and the provision of this information in an accessible format or with appropriate communication supports, as soon as possible, upon request.

### **Action planned:**

- Ensure that third party facilities managers are able to provide building related emergency and public safety information in an accessible format or with appropriate communication supports, as soon as practical, upon request.
- Notify employees of any individuals who may require assistance or accommodations who are on site.

# Employment Standards

## **Requirement: Recruitment**

Benmet Steel & Metal is committed to fostering and sustaining an inclusive and accessible workplace that allows all employees to fully participate. Benmet Steel & Metal policies promote the recruitment, retention and development of talented employees through equitable and barrier-free practices. We uphold the rights of all employees to be treated with dignity, respect and equality. Every staff member is expected to contribute to creating and sustaining a workplace that is respectful and inclusive of individual needs and differences.

The President in consultation with Pivotal Integrated HR Solutions sets out the framework for human resources policies (Human Resources Management Directive HRMD). All HRMDs, policies and practices encompass the principles of inclusion and accessibility.

### **Actions taken:**

- Benmet Steel & Metal ensures that every attempt has been taken to follow HRMD set out by the President and Pivotal Integrated HR Solutions.

### **Actions planned:**

- Benmet Steel & Metal will continue to follow HRMD set out by the President and Pivotal Integrated HR Solutions.

## **Requirement: Accessible formats and communication supports for employees**

Benmet Steel & Metal will support our employees with disabilities by providing information in a clear and accessible way in order to effectively perform their jobs.

### **Actions taken:**

- Assistive technology in use includes various keyboards, specialty mice, and ergonomically designed workstations and components.
- Implemented individual employee accommodation plan.
- Office design standards have considered accessibility and automatic door openers have been installed where required by individuals with mobility impairments.

### **Actions planned:**

- Continue to provide assistive devices as required.
- Provide training to employees on how to create accessible documents.
- Benmet Steel & Metal ensures that training material is provided in verbal and written formats and will ensure that closed captioning is utilized in any internal training videos.

## **Requirement: Documented individual accommodation plans**

Benmet Steel & Metal is committed in documenting individual accommodation plans for employees with disabilities. If requested, the accommodation plan will include information regarding accessible format and communication supports provided, individualized emergency response information, if required, and any other accommodation that is to be provided.

### **Action taken:**

- Benmet Steel & Metal ensures that every attempt has been taken to follow the workplace accommodation policy and the work safe program that includes documented processes (Disability Accommodation Policy) and information on accommodating employees with varying abilities.

### **Action planned:**

- Benmet Steel & Metal will continue to comply with documented processes and procedures under the policy.

## **Requirement: Workplace emergency response information**

Where Benmet Steel & Metal is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as possible if such information is necessary given the nature of the employee's disability.

### **Actions taken:**

- Our emergency protocols include persons requiring assistance and AODA requirements.
- An employee-wide communication was deployed to identify employees with disabilities requiring workplace emergency response assistance as persons requiring assistance.
- Individualized workplace emergency plans have been prepared for employees who have disclosed a disability and who require accommodation.
- A process for communicating individual emergency response plans to floor fire wardens has been implemented maintaining the privacy of any medical information that may be disclosed during the accommodation process.

### **Actions planned:**

- Review and revise individualized workplace emergency plans on an ongoing and regular basis.
- Canvas employees every year to identify employees requiring workplace emergency response assistance for new and existing employees.

## Design of Public Spaces

### **Requirement: Accessible public spaces**

Benmet Steel & Metal will incorporate accessibility design, criteria and features when procuring or redesigning any space owned or leased by the organization.

When management constructs or redevelops Benmet Steel & Metal public spaces such as service counters and waiting areas, we will do so in keeping with the requirements set out in the Integrated Accessibility Standards - The Design of Public Spaces Standards and Ontario's Building Code.

#### **Action taken:**

- Real Estate and Facilities Management adhere to the requirements in the Ontario Building Code, the Integrated Accessibility Standards Regulation, the Guide to the Integrated Accessibility Standards Regulation and any other Ontario government requirement governing accessibility.

#### **Action planned:**

- As Benmet Steel & Metal spaces get redeveloped, we will work to ensure that physical accessibility are improved.

## Customer Service Standard

### **Requirement: Accessible customer service**

Benmet Steel & Metal strives for service excellence in all of our interactions with our customers. From the very first moment of contact with our employees, customers should feel that we are listening and responding to their needs.

We will meet the requirements of AODA and the IASR. The organization proactively identifies barriers to accessibility and determines appropriate ways to accommodate customer needs in order to provide customer service that is accessible to people with varying abilities.

#### **Actions taken:**

- Benmet Steel & Metal continues to look for opportunities to improve our services and processes in an effort to make it faster, easier and more efficient to do business with the company. These enhancements will improve our accessible services.
- All employees and managers have been trained on interacting with customers of all abilities and we maintain records of the training that is provided.
- Assistive devices and service animals are permitted on all Benmet Steel & Metal premises locations in areas where customers have access.
- Support persons that accompany a person with a disability are welcome in areas where the public or third parties are permitted and or served.
- Emergency procedures have been developed to ensure customers with varying abilities are assisted in building emergencies.



**Actions planned:**

- Continue to train new employees on accessible customer service as required.
- Continue enabling customers to use assistive devices and welcoming the assistance of service animals and support persons.
- Continue to communicate when accessible services are temporarily unavailable using methodologies appropriate for the circumstances.
- Continue reviewing emergency procedures to ensure customers with varying abilities are assisted in building emergencies.
- Develop digital services with accessibility with accessibility at its core, striving for all users to have equal access to information and functionality.

**Requirement: Feedback**

Feedback on how services were delivered to people with disabilities will be invited, forwarded to the appropriate personnel, responded to, documented and tracked.

Feedback will be collected by phone, by e-mail via the Benmet Steel & Metal website and in person. Feedback will be accepted in accessible formats and with other communication supports as required. Feedback will be considered to improve services and when reviewing the Multi-Year Accessibility Plan.

**Action taken:**

- No requests or feedback currently.

**Action planned:**

- Implement an accessible customer service feedback process. Feedback can be provided in multiple formats including phone, email or in person.
- Continue to use the accessible feedback mechanisms as a means for improving services to persons with different abilities.

## Measuring results

**Accessibility status reports**

Benmet Steel & Metal will prepare annual accessibility status reports. The report will include how we have met our goals, commitments and the legislative requirements for that period, as laid out in this Plan. Reports will be available upon request and will be provided in alternate formats on request.

**Reviewing feedback**

Benmet Steel & Metal will monitor and evaluate any feedback the organization has received throughout the year related to accessibility. This information will be used to continuously improve our processes and may be integrated into our accessibility reports and/or Multi-Year Accessibility Plan.

**Revisions to the Multi-Year Accessibility Plan**

If, through feedback and our own accessibility action and planning processes, Benmet Steel & Metal determines that the Multi-Year Accessibility Plan needs revision, we will update it to reflect these insights. Revisions will be available upon request and will be provided in alternate formats on request.