



Municipality of South Huron Policy

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1. Purpose

Regulation 191/11: Integrated Accessibility Standards under the *Accessibility for Ontarians with Disabilities Act, 2005* requires organizations to create written accessibility policies and make them publicly available. Accessibility policies are the formal rules an organization puts in place to achieve its accessibility goals.

2. Statement of Organizational Commitment

The Municipality of South Huron is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and Ontario's accessibility laws.

3. Policy Statement

The Municipality of South Huron Accessibility Policy (hereafter referred to as the "Policy") establishes a framework for compliance with the Municipality's commitment to accessibility, requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA), requirements of the Integrated Accessibility Standards Regulation (IASR) under the AODA, and additional municipal requirements.

The Municipality of South Huron is committed to building an inclusive society that values the contributions of people with disabilities. It is committed to providing an accessible environment in which people with disabilities can access the Municipality's goods, services, and facilities, including all buildings, public spaces, information and communications, in a way that meets their individual needs. The Municipality is committed to the identification, removal and

prevention of accessibility barriers, including attitudinal, systemic, information, communications and technology, and built environment and physical barriers.

The Municipality of South Huron is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. The Municipality of South Huron understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

The Municipality of South Huron is committed to excellence in serving and providing goods, services or facilities to all customers including people with disabilities. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

The AODA provides for the development, implementation and enforcement of accessibility standards in order to achieve accessibility for persons with disabilities in all aspects of society. The Municipality must meet requirements in key areas including:

- General Standards (Procurement, Training and Policy)
- Customer Service
- Information and Communication
- Employment
- Transportation
- Built Environment and Public Spaces.

In all of the key areas listed above, the AODA requires the Municipality to:

- identify, prevent and remove barriers people with disabilities face in accessing the Municipality's goods, services, and facilities
- accommodate the accessibility needs of people with disabilities to ensure they can obtain, use or benefit from municipal goods, services, and facilities, and that they can do so in a timely manner, at a cost no greater than the cost for people without disabilities
- develop and train municipal employees on providing accessible goods, services, and facilities.

4. Scope

This policy applies to all persons who deal with members of the public or other third parties on behalf of the Municipality, whether the person does so as an

employee, member of Council, agent, volunteer, student placement, or otherwise and all persons who participate in developing the Municipality's policies governing the provision of goods, services or facilities to members of the public or other third parties.

5. Definitions

Accessibility means a concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and also refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

Accessible refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both "direct access" (i.e. unassisted) and "indirect access," referring to compatibility with a person's assistive technology.

Accessible Formats refers to formats that are usable by persons with disabilities including but not limited to: large print, recorded audio and electronic formats, and braille.

Accommodation means in the context of Human Rights, accommodation means preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individuals or groups protected by Ontario's Human Rights Code from having equal access to full benefits available to others. Principles of accommodation include dignity, individualization and inclusion or integration. .

Assistive Devices are used to replace, compensate or improve the functional abilities of people with disabilities. They include a broad range of items including mobility such as; prosthetics, wheelchairs, canes, walkers, medical such as; ventilators, respiratory equipment and sensory such as; communication aids, reading and writing devices and hearing aids.

Barrier is defined by the AODA as anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Disability: as defined in Section 10 of the Ontario Human Rights Code, R.S.O. 1990 c. H.19.

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limited the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, 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 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.

Municipality means the Municipality of South Huron.

Practicable means capable of being done or put into practice; capable of being used. Factors relevant to determining if accessibility is practicable may include:

- Availability of accessible services, goods including commercial software or tools, or facilities
- Technological compatibility between older products and newer ones being procured.

Service Animals is defined by Section 80.45 (4) of the AODA Customer Service Standards (O.Reg 165/16) as an animal is a service animal for a person with a disability if the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or the person provides documentation from one of the following regulated health professional confirming that the person requires the animal for reasons relating to the disability:

- A member of the College of Audiologists and Speech Language Pathologists of Ontario
- A member of the College of Chiropractors of Ontario
- A member of the College of Nurses of Ontario
- A member of the College of Occupational Therapists of Ontario
- A member of the College of Optometrists of Ontario
- A member of the College of Physicians and Surgeons of Ontario
- A member of the College of Physiotherapists of Ontario
- A member of the College of Psychologists of Ontario
- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person as defined by the *Accessibility for Ontarians with Disabilities Act, 2005* shall mean any person, whether a paid professional, volunteer, family member or friend who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

6. General Standards

The Municipality of South Huron is a designated public sector organization under the AODA and is committed to meeting the accessibility needs of people with disabilities.

Accessibility Advisory Committee

The Municipality of South Huron along with member municipalities have established the Huron Municipality Accessibility Advisory Committee (HCAAC) with a majority of members of the Committee whom are persons with disabilities. The HCAAC advises Council about the requirements and implementation of the AODA accessibility standards, preparation of accessibility reports, including access for persons with disabilities to a building or premises, and other matters for which Council may seek advice.

Accessibility Policies

The Municipality will ensure the general requirements of the Integrated Accessibility Standards Regulation (IASR) under the AODA are met in order to achieve accessibility for persons with disabilities. The AODA requires the municipality to maintain one or more policies governing how the organization will achieve the requirements of the IASR. The Municipality will also make such documents available to the public, and in accessible formats upon request. This Policy is adopted in compliance with this obligation.

Multi-Year Accessibility Plan

The AODA requires the municipality to establish, implement, maintain and make public a Multi-Year Accessibility Plan outlining the corporate strategy to identify, remove and prevent barriers and to meet the legislated requirements of the IASR. The plan must be developed in consultation with the Accessibility Advisory Committee and people with disabilities. The Municipality of South Huron and each member municipality have created an Annual Accessibility Plan under the *Ontarians with Disabilities Act 2001* and a Multi-Year Accessibility Plan update under the *Accessibility for Ontarians with Disabilities Act 2005*, with annual updates on successes.

The Municipality of South Huron has completed both requirements with the documents approved by South Huron Council. The Plan is posted on the municipal website and made available in an accessible format or with appropriate communication supports as soon as possible, upon request.

Procurement of Goods, Services and Facilities

As required by the AODA, when acquiring or procuring goods, services, and facilities, including self-service kiosks the municipality must incorporate accessibility criteria and features, and will do so as early as possible in the procurement process. Where it is not practicable to do so, an explanation will be provided upon request, in accordance with South Huron Procurement of Goods and Service Policy.

Self-Serve Kiosks

The Municipality of South Huron will incorporate accessibility features/consider accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks.

Training

The AODA requires that all employees, volunteers and persons who participate in developing Municipality policies must receive training on the AODA, the *Ontario Human Rights Code*, and Accessible Customer Service.

The Municipality of South Huron is committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities. In addition, we train:

- a) All persons who participate in developing the organization's policies; and
- b) All other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- Our policies related to the Customer Service Standards
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities
- What to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. The Municipality maintains records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

Feedback

The Municipality of south Huron welcomes feedback on how we provide accessible customer service. Customer feedback help us identify barriers, respond to concerns and encourage continuous service improvement.

Responding to Feedback:

- All feedback on accessible customer service, regardless of how it is received, should be directed initially to the Clerk or designate for the feedback to be reviewed and identified as a complaint, suggestion or compliment;
- The Clerk or designate will maintain a record outlining the details, follow-up and actions to be taken;
- If the feedback form indicates that the customer wishes to be contacted, the Clerk or designate will acknowledge receipt of the feedback within 5 business days;
- Where possible, complaints will be acknowledged and addressed immediately;
- The Clerk or designate will forward feedback to appropriate Director/Manager;
- The Director/Manager will determine appropriate action;
- The Director/Manager will review barriers identified in feedback and determine if it is feasible to remedy the barrier;
- The Director/Manager will advise the Clerk or designate of the decision and reasons for it;
- The Clerk or designate will advise the person who submitted the feedback of the decision and reasons for it within 30 business days.
- If agreement on the resolution of a concern cannot be reached between the appropriate Manager/Director or designate, the complainant has the option of presenting the concern to South Huron Council for final disposition.

Feedback can be provided to the Municipality in the following ways

- a) By mail addressed to: Clerk, 322 Main Street S, Box 759, Exeter ON N0M 1S6
- b) By telephone: 519-235-0310
- c) In person at: Olde Town Hall, 322 Main Street S Exeter Ontario
- d) By email at: clerk@southhuron.ca
- e) By Website Form at: www.southhuron.ca

The Feedback form forms part of the Municipality's Accessibility Standards for Customer Service and is available on the Municipal website. The Municipality of South Huron ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Notice of Availability of Documents

The Municipality of South Huron notifies the public that documents related to accessible customer service are available upon request on the municipal website www.southhuron.ca. The Municipality of South Huron will provide these documents in an accessible format or with communication support, on request.

The Municipality will consult with the person making the request to determine the suitability of the format or communication support and will provide the accessible format in a timely manner and, at no additional cost.

7. Customer Service Standard

Assistive Devices

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from the Municipality's goods, services or facilities. It is the responsibility of the person with a disability to ensure his/her assistive device is operated in a safe and controlled manner at all times.

Exceptions may occur in situations where the Municipality has determined the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises. In these situations, and others, the Municipality may offer a person with a disability other reasonable measures of assistance in obtaining, using and benefiting from the Municipality's goods, services or facilities, where the Municipality has such other measures available. Staff within the applicable division will be trained in the application and use of the devices the Municipality has on site or that we provide that may be used by customers with disabilities while accessing our goods, services or facilities.

Notice of Temporary Disruption

Temporary disruptions in municipal services or facilities may occur due to reasons that may or may not be within the Municipality's control or knowledge.

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, the Municipality will make reasonable efforts to provide notice of the disruption to the public including information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if any, may be available.

Services/Facilities include any temporary planned or unplanned service disruption of facilities, services or systems that are relied upon by people with disabilities to access Municipal goods, services or facilities, such as elevators, lifts, or accessible washrooms.

If the disruption is anticipated, the Municipality will provide a reasonable amount of advance notice of the disruption. The Municipality will provide notice by any method that may be reasonable under the circumstances, as soon as possible, including but not limited to the municipal website (www.southhuron.ca) or site specific postings.

Support Persons

Persons with disabilities may enter premises owned or operated by the Municipality with a support person and have access to the support person while on the premises. The Municipality may require a person with a disability be accompanied by a support person while on Municipal premises in situations where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Before making a decision, the Municipality name will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

A support person, when assisting a person with a disability to obtain, use or benefit from the Municipality's goods, services or facilities, will be permitted to attend at no charge where an admission fee is applicable.

The municipality will confirm that if an amount is payable for a person's admission to the premises and ensure that notice is given in advance about the amount, if any, payable in respect to the support person.

Service Animals

The Municipality welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. When we cannot easily identify that an animal is a service animal, our staff may ask for a letter from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario

- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

It is the responsibility of the person with the disability to be in care and control of the service animal, at all times. If the service animal is not kept under control, has bitten another person or animal, or is a menace to the safety of other persons or animals, the service animal may be required to leave the premises. If this occurs the person will be permitted to continue to access the Municipal goods or services without the animal. In addition, Municipal employees will, upon request, consider alternate accommodations for the person in such circumstances. The Municipality may refuse to permit the service animal to accompany the person until steps have been taken to correct the situation, and the issue has been resolved.

8. Information and Communication Standards

The Municipality communicates with people with disabilities in ways that take into account their disability and the Municipality works with the person with disabilities to determine what method of communication works for them.

Accessible Formats and Communication Supports

Upon request, the Municipality of South Huron will provide or arrange for the provision of accessible formats or communication supports for persons with disabilities. These accessible formats and communication supports will be provided in a timely manner and in a way that takes into account the individual needs of a person with a disability.

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports.

The Municipality of South Huron will consult with the person making the request to determine the suitability of an accessible format or communication support. Such accessible documents and communication supports will be provided at a

cost no greater than the regular costs charged to others. If, in consultation with the Clerk's Department the information or communication is determined to be unconvertible, the Municipality must provide the person requesting the information or communication with:

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

The Municipality will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Emergency Procedures, Plans or Public Safety Information

The Municipality will upon request provide emergency procedures, plans or public safety information in an accessible format or with appropriate communication supports as soon as practicable.

Accessible Websites and Web Content

The Municipality will ensure the official county website and web content conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG). Except where meeting this requirement is not practicable, this conformity applies to websites, web content and web-based applications that are controlled directly or through a contractual relationship that allows for the modification of the product and to web content.

The Municipality of South Huron's Clerk's Department, in consultation with Managers and Directors are responsible for establishing and maintaining procedures, standards and guidelines to ensure all internet websites and web content is accessible.

9. Employment Standards

The Municipality of South Huron will foster an inclusive workforce and provide equitable treatment and accommodation to ensure a barrier-free employment. The requirements in this section apply only to employees of the Municipality. Volunteers and other non-paid individuals are not captured under this section. This section addresses the Municipality's requirements of the IASR Employment Standards under the AODA.

Recruitment, Assessment and Selection Process

The Municipality of South Huron is committed to equal consideration of candidates during the recruitment, assessment and selection process. Job applicants, including the public and current employees, will be notified of the availability of accommodations for persons with disabilities in its application process.

Individuals selected to participate in assessment or selection processes, such as an interview or testing, will be notified of the availability of accommodations, upon request, during such an assessment or selection process. In cases where accommodations due to disability are requested, the Municipality of South Huron will consult with the individual and provide or arrange for suitable accommodations in a manner that takes into account the applicant's disability needs. Accommodations will be provided with respect to the materials or processes used in recruitment. When making offers of employment, the Municipality of South Huron will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

The Municipality notifies staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

Accessible Formats and Communication Supports for Employees

The Municipality will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) Information that is needed in order to perform the employee's job; and
- b) Information that is generally available to employees in the workplace

Workplace Emergency Response Information

The Municipality will provide individualized emergency response information to employees who identify potential accessibility barriers when responding to emergency situations. If the employee requires assistance and with their consent, the Municipality will provide the individualized emergency response

information to the person(s) designated to provide assistance. The Municipality will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

The Municipality will review the individualized workplace emergency response information:

- a) When the employee moves to a different location in the organization;
- b) When the employee's overall accommodations needs or plans are reviewed; and
- c) When the employer reviews its general emergency response policies.

Documented Individual Accommodation Plans

The Municipality has a written process for the development of documented individual accommodation plans for employees with disabilities. The individual accommodation plan shall include:

- If requested, any information regarding accessible formats and communication supports provided to the employee;
- If required, individualized workplace emergency response information; and
- Any other accommodations that are to be provided

Return to Work Process

The Municipality maintains a documented return to work process for employees with a disability and who require disability-related accommodation in order to return to work. The return to work process outlines the steps the Municipality will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

The return to work process does not replace or override any other return to work process created by or under any other statute.

Performance Management, Career Development, and Redeployment

The Municipality will ensure employees with disabilities or individual accommodation plans are provided equitable access to career development, performance management and redeployment opportunities.

10. AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment)

The Municipality will ensure accessibility at all its facilities and public spaces by designing with accessibility in mind.

The Municipality of South Huron shall comply with the AODA Design of Public Spaces Standards (Accessibility Standards for the Built Environment) when undertaking new construction and redevelopment of public spaces in the following areas:

- Recreation trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces
- Accessible parking
- Obtaining services
- Service-related elements like service counters, fixed queueing lines and waiting areas
- Maintenance of accessible elements

The Municipality has procedures in place to prevent service disruptions to the accessible parts of our public spaces.

The Municipality adopted a Universal Design and Accessibility Site Plan Guidelines developed by the Huron County Accessibility Advisory Committee. The guidelines act as a mandatory guiding standard of excellence in accessibility for newly constructed buildings, renovated Municipal facilities and public spaces and is updated periodically to address changing legislation and industry best practices.

11. Transportation Standards

The Municipality of South Huron licence owners and operators of taxicabs. Owners and operators of taxis licensed by the Municipality are prohibited from charging an additional fee for persons with disabilities, or a higher fare than for persons without disabilities for the same trip. At no time will a fee be charged for the storage of mobility aids or mobility assistive devices.

The Municipality may enter into agreements with community transit systems. Buses are fully accessible, with high floor ramp access for multiple wheelchairs. In cases where a bus stop is temporarily inaccessible, riders will be able to board or exit the bus at the nearest accessible and safe location. The operator will consider the preference of riders, however the final determination of a safe location will be determined by the Operator.

AODA Reporting Requirements

The Municipality must submit completed compliance reports to the Province in accordance with the schedule set out in the AODA.

12. Financial Implications

The Municipality may incur costs in implementing staff training required for meeting the accessibility standards for customer service. The other potential financial implication is in regard to non-compliance with the law. Enforcement provisions exist under the AODA that did not exist previously under the ODA. Inspectors will have the power to request documents and records. Every person guilty of an offence under the Act can be fined up to \$50,000 per day or part day on which the offence occurs or continues to occur. The Municipality can be fined up to \$100,000 per day or part day on which the offence occurs or continues to occur.

Changes to this or other policies

The Municipality is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Any changes made to this policy will take into consideration the impact on people with disabilities.

This document is publicly available. Accessible formats are available upon request.

13. Questions about this policy

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by or referred to the Clerk.

14. Contraventions

For all persons representing the Municipality of South Huron as elected or appointed officials, action will be determined by Council for failure to comply with this Corporate Accessibility Policy

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal. The Municipality's failure to comply with AODA may result in significant fines and reputational damage.

15. Reference and Related Documents

Legislative and Administrative Authorities

- *Accessibility for Ontarians with Disabilities Act (AODA)*, 2005, S.O. 2005, c.11 (AODA)
- Accessibility Standards for Customer Service, O. Reg.429/07
- AODA, Integrated Accessibility Standards Regulation, O. Reg. 191/11
- Ontario Human Rights Code, R.S.O. 1990, c.H.19
- Municipal Elections Act

Related Municipality of South Huron Policies and Plans

- Election Accessibility Plan
- Customer Service Policies and Procedures – Approved 2009
- Adopt Universal Design-Accessibility Guideline – Site Plan Control – By-Law 11-2016
- South Huron Communication Policy – A09-Media Public Relations 001-2018
- South Huron Public Engagement Policy – A09-Media and Public Relations – 002-2018
- South Huron Procurement Policy – F17-Procurement of goods and Services – 001-2021
- HR Policy Individualized Workplace Emergency Response
- HR Policy Individual Accommodation Plans
- HR Policy Return to Work Plan