

May 18, 2018

The Honourable Tracy MacCharles
Minister of Government and Consumer Services
Minister Responsible for Accessibility
Mowat Block 6th Floor, 900 Bay Street
Toronto, Ontario M7A 1L2

Dear Minister:

Re: Review of the Employment Standards

We are writing to provide feedback from The Regional Municipality of York regarding proposed initial recommendations to the Employment Standards under the *Integrated Accessibility Standards Regulation* (O.Reg. 191/11), as posted for public input on March 20, 2018. York Region supports the proposed initial recommendations.

York Region agrees a definition of “employee” should be added, however we ask the Employment Standards Development Committee offers the final proposed definition for public review and feedback before enactment as it may have significant impact on employers. It is important to ensure this definition is consistent with the intent and purpose of the *Accessibility for Ontarians with Disabilities Act (AODA)*, is based on the employer-employee relationship and aligns with the existing employment legislation.

York Region supports the proposal to amend and expand *Section 22: Recruitment, general* to promote availability of accommodation during the employment lifecycle, not just during the recruitment process. Though accommodations are currently required to be available throughout employment, it is important for prospective employees to know accommodations are available throughout the employment cycle upon request.

We also support the proposal to amend *Section 27: Workplace emergency response information* to remove the word “individualized” and to clarify the requirement to provide emergency response information in accessible formats, upon request. Documented individual accommodation plans under Section 28 already include individualized workplace emergency plans and accommodation needs. Individualized emergency response needs are best addressed under Section 28.

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Review of the Employment Standards

York Region supports the strong focus on the development of tools, guidelines and resources on the Ontario Human Rights Code, recruitment, assessment and selection process, individualized accommodation plans and return to work process. These tools will help organizations across Ontario to reach the long-term objective of the Employment Standards.

We appreciate the opportunity to provide input.

Sincerely,



for Katherine Chislett
Commissioner, Community and Health Services
The Regional Municipality of York

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