



Accessibility Plan (2024)

In Response To The Accessible Canada Act

May 3, 2024

General

The Accessibility Plan (2024), for Belle Pulses Ltd of Saskatchewan, has been created by the Human Resources Department. All enquires should be emailed or addressed to:

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Executive Summary

Belle Pulses Ltd is an agricultural seed cleaning and processing company of about 45 employees, located in rural Saskatchewan. The purpose of the Accessible Canada Act is to make Canada barrier-free by January 1, 2040. This involves identifying, removing and preventing barriers in federal jurisdiction, in several priority areas.

A “barrier” is anything that keeps a person with a disability from participating fully and equally in society. A “disability” is any physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation.

Federally regulated entities are required to produce a plan to address any barriers or limitations they find in these prescribed priority areas:

- employment
- built environment
- information and communication technology
- communication, other than information and communication technology
- procuring goods, services and facilities
- designing and delivering programs and services
- transportation

This plan outlines concrete actions that will help us take our first steps toward becoming accessible - by default. Belle Pulses is committed to working with all stakeholders including: our senior leaders, our employees, Indigenous Peoples and members of the public to create a workplace that applies an accessibility lens to every context, both internally and externally.

We are also committed to improving our approach to workplace accommodations. As part of this, we will develop a framework that makes sure managers understand they are responsible for supporting their employees and implementing suitable workplace adjustments.

We are committed to gathering feedback (Appendix C) from, and working with women, visible minorities, indigenous peoples and people with disabilities as we:

- Evaluate Existing Facilities and Services;
- Identify Gaps in Safety, Diversity, Equity, Inclusion and Accessibility;
- Improve our Environment toward creating and maintaining an accessible workplace; and
- Develop and/or Promote Training on Accessibility Topics.

Lastly, we are also committed to Canada's Disability Inclusion Action Plan along with various other legislative features including Safety, Diversity and Equity. We view each of these as connected and treat each in conjunction with one another. Thus, we are contributing to this Action plan, by doing what we can to make Belle Pulses Accessible to all peoples.

Accessibility Statement

Belle Pulses is committed to addressing barriers and limits that impact women, visible minorities, indigenous peoples and people with disabilities by implementing this Accessibility Plan. We have been guided by our desire to create a Safe, Diverse, Equitable, Inclusive and Accessible workplace for our employees, customers, suppliers and indeed all stakeholders including indigenous peoples. *See Appendix A - Safety Statement and B - Social Responsibility Statement.*

- We will consult and make sure any new initiatives are developed through a complete accessibility lens. This will help us make sure that we consider all relevant views in the first phases of a project or procurement process.
- This plan is our first step towards making sure that we reduce or remove the barriers that women, visible minorities, indigenous peoples and people with disabilities face so that everyone can fully participate in our organization.

We value diversity and inclusion, and understand that it is important to our products, policies, and practices. Though we have work to do, we are committed to meeting the Government of Canada's goal of being barrier free by January 1, 2040.

Accessibility Plan and Process

Belle Pulses Ltd, as an agricultural seed cleaning and processing company of about 45 employees, located in rural Saskatchewan, is required by the Accessibility Canada Act to produce an Accessibility Plan. In keeping with the best practices identified in the Accessibility Canada resources provided, the following is the Belle Pulses initial Accessibility Plan (2024).

Belle Pulses is committed to building and maintaining a Safe, Diverse, Equitable, Inclusive and Accessible workplace because we know our employees are key to our success. We will achieve this goal by create an accessibility plan that is managed through our Gold Standard - Internal Responsibility System: Involve Stakeholders, Institute Standards, Identify Barriers/Hazards/Risks, Investigate Incidents, Improve Conditions and Inform Staff, to make Incremental Changes. The root of this system is to Identify Barriers, Improve Conditions and Invest in People. For the purpose of this plan, this will be the process:

- Step 1 – Create Goals and Identify Stakeholders, Environments and Risks
- Step 2 – Evaluate Environments, Identify Changes and Scope Improvements (Appendix C, D, E)
- Step 3 – Institute Standards and Improvements and Educate Stakeholders
- Step 4 – Re-evaluate the Environment and Report every 3 years

After a cursory review of information about our workforce and environment, we have designed an initial Accessibility Plan (2024). For each of the prescribed priority areas listed below, is a goal and possible improvement actions have been identified:

1. employment
2. built environment
3. information and communication technology
4. communication, other than information and communication technology
5. procuring goods, services and facilities
6. designing and delivering programs and services
7. transportation

Over the 3 years (2024 to 2027) between our Accessibility Plan launch and the first reporting period, Belle Pulses will use this process to make incremental changes. Our overall goal is to: Improve accessibility while improving our business. Accessibility and our business success are tied together through our people.

Employment

We are committed to continuing to remove barriers to employment, recruiting and development for women, visible minorities, indigenous peoples and people with disabilities. We will develop a strategy to ensure employment accessibility to women, visible minorities, indigenous peoples and people with disabilities resulting in a continued diverse workforce. Due to the nature and location of our operations, it will be difficult to establish meaningful prescribed diversity / national representative workforce numbers including those with disabilities. It will be more meaningful to describe what barrier-free employment success looks like at Belle Pulses.

Goal:

To ensure Belle Pulses is an employer of choice for women, visible minorities, indigenous peoples and people with disabilities, in the communities surrounding our operations, by becoming barrier-free in employment practices and workforce composition. This will be evident through our diverse workforce of women, visible minorities, indigenous peoples and people with disabilities.

Action Plan:

We will achieve this goal by maintaining policies and procedures that reflect federal employment standards and regulations, using existing tools to ensure a Safe, Diverse, Equitable, Inclusive and Accessible workplace and coaching and training supervisors in accessibility. This will also includes:

- reviewing our staffing processes and educating stakeholders on a Safe, Diverse, Equitable, Inclusive and Accessible workplace;
- promoting existing resources such as our health benefits plan to encourage a healthy workforce;
- holding targeted recruitment processes for women, visible minorities, indigenous peoples and people with disabilities as needed;
- evaluating current hiring practices and making changes to reduce barriers that impact women, visible minorities, indigenous peoples and people with disabilities;
- evaluating and improving our employee onboarding process for accessibility barriers and to make sure new employees know about our accessibility tools and resources that can help them;
- review our duty to accommodate processes, in particular 1) adaptive tools pre/post employment requests and 2) leaves of absences.

Other Considerations:

- Determine the accessibility training need of the business;
- Train employees in accessibility consideration that are within the scope of their job;
- Building and maintaining an inclusive and diverse workforce that respects everyone;
- Encouraging employees to self-identify as members of employment equity groups to make sure that we have accurate data;
- Using a rigorous process to investigate safety, discrimination, conduct and values and ethics claims.

The Built Environment

Belle Pulses operates industrial facilities that clean and process agricultural seeds. Our processing facilities are built largely of steel rigging which is open to weather elements. This will greatly impact physical accessibility. However, we will assess our physical built environment to ensure that reasonable accessibility issues are improved.

Goal:

To assess and improve reasonable accessibility, to the built environment of Belle Pulses facilities. This will be evident in accessibility and adaptive features of the workplace.

Action Plan:

- Over the next 3 years, do an environmental scan and work with physical and mental disability stakeholders, to assess our facilities for improved accessibility.
- When designing and updating work-spaces, we will consult with women, visible minorities, indigenous peoples and people with disabilities to ensure functionality and usability of accessibility elements.
- Create a list of available adaptive and accessibility tools and resources,
- Provide appropriate safety training, including accessibility and accommodation options

Other Consideration:

- Evaluate no or poor-quality signage for key features like accessible parking spaces, travel pathways, entrance doors, service desks, evacuation plan, washrooms etc.
- Upgrade to tactile signage and large, high contrast text when possible and appropriate.
- Evaluate curb ramps at all sites with a level change.
- Ensure that removing snow and ice from walking pathways is prioritized
- Improve occupational safety and in particular fixtures or furniture to improve flow and safety.
- Evaluate No or poor-quality accessible washrooms.
- Evaluate accessible toilets and sinks, grab bars, automated doors and dispensers.
- Make sure our facilities have reliable internet service and Wi-Fi

Information and Communication Technology

As society relies more and more on sharing and communicating information digitally, we will work to make sure that accessibility is considered. We want to make sure that our information and communications technology products, services and digital content can be accessed and used by all.

Goal:

To provide information technology access to all employees and to use information Technology, where needed, to improve accessibility and adaptivity. This will be evident through improved technology literacy and leveraging information technology.

Action Plan:

- Seek feedback from our diverse workforce of women, visible minorities, indigenous peoples and people with disabilities, regarding adaptive and accessibility information technology needs
- Assess the need for adaptive and accessibility information technology
- To make sure there's barrier-free access to our information and communication technology,

We are committed to:

- creating a list of available adaptive and accessibility information technology tools
- developing accessibility training sessions for employees leaders
- consulting existing employees with disabilities, to learn about the barriers they face that impact their ability to be successful at their job

Communication, other than Information and Communication Technology

Belle Pulses is a low technology organization, communication is conducted largely in print and verbal. When asked, we are committed to providing alternative formats, within time frames listed in the Accessible Canada Regulations, such as:

- Print
- Large Print
- Spoken Word (or Audio/Video recording)

Goal:

To provide communication to all employees in the format best suited to them and to improve accessibility / adaptivity communication tools.

Action Plan:

- Assess the need for adaptive and accessibility communication tools

We are committed to:

- creating a list of available adaptive and accessibility communication tools
- when asked, we commit to assessing or providing these alternative content formats to employees: large print and audio/video formats

Procuring Goods, Services, and Facilities

Procurement as both a function and the products they source are important accessibility considerations. The function of procuring goods and services should be mindful of accessibility.

Goal:

Belle Pulses will consider the accessibility nature of partners and the good and services they provide. This will be evident in considering and purchasing good and service that have accessibility features.

Action Plan:

We will make sure our partners and clients consider accessibility requirements at the start of a procurement process. This will help make sure goods and services will be accessible and help the procurement process support Accessibility Standards.

To make sure that we practice accessible procurement, we will:

- Create a standard list of available partners, good and services, along with adaptive and accessibility tools, that may be purchased

Designing and Delivering Programs and Services

We are committed to reviewing and developing, internal and external, products and services through an accessibility lens. Whether it is working with employees, suppliers, customers or producers, there are accessibility considerations that can improve our service.

Goal:

Our programs and services are designed and delivered in a way that everyone can access, especially people with disabilities. We make sure that everyone who interacts with us, is satisfied with the accessibility of our programs and services.

Action Plan:

To achieve this goal we will:

- consult people with disabilities when we develop or review programs or services
- research and review accessibility standards and how they can impact our workplace
- evaluate accessibility considerations relative to business imperatives such as food safety regulations and grain processing regulations, established by either industry or legislation

Transportation

Transportation in our business is vital to all we do. This includes transportation to our facilities by employees, stakeholders and producers and transportation of finished product to customers.

Goal:

By understanding the matrix of transportation in our business, ensure that facilities are accessible for stakeholders.

Action Plan:

To achieve this goal we will:

- Review and evaluate all types of transportation that impact our business
- Educate staff where needed about the accessibility consideration of transportation
- Maintain facilities and grounds, to ensure safe people and motor vehicle accessibility
- Research governmental programs that may improve transportation accessibility

Consultations

In preparation for our Accessibility Plan we conducted a brief survey with several employees with physical and cognitive disabilities. We followed this up with an interview with one disabled employee and then communicated with the Saskatchewan Abilities Council and Inclusion Saskatchewan about general feedback from their clientele. This helped shape some of our Accessibilities Plan Goals.

To further ensure success in implementing our Accessibility Plan, we will continue to develop our organization's culture by:

- Including people with disabilities and teaching employees about the barriers they face
- Use best practices, research, and guidelines from the Treasury Board Secretariat and other Government of Canada Accessibility resources
- Provide staff with equity, diversity and inclusion training

We will also commit to, throughout the Accessibility plan reporting period, additional consultations to provide both feedback and validation.

- We commit to identifying women, visible minorities, indigenous peoples and people with disabilities stakeholders that can be relied on to provide advice and feedback on accessibility considerations.
- We will conduct a full employee level accessibility survey to collect information about our workforce.
- We will conduct annual accessibility audits to ensure that accessibility standards are maintained, new issues are identified and status of improvements are recorded.
- We will engage our leaders in understanding and championing accessibility through engagement meetings.

Feedback

Using periodic surveys and open communication channels with employees and stakeholders, we will ensure continuous feedback. Furthermore, we will manage communication and feedback using our Internal Responsibility System: Involve Stakeholders, Institute Standards, Identify Barriers/Hazards/Risks, Investigate Incidents, Improve Conditions and Inform Staff, to make Incremental Changes. The root of this system is to Identify Barriers, Improve Conditions and Invest in People. This mechanism includes a suggestion box, incident reporting forms / resources and an investigative / response process.

Attachments

Appendix A: Safety Statement

Appendix B: Social Responsibility, Ethics and Inclusion Statement

Appendix C: Workplace Accessibility Survey

Appendix D: Annual Accessibility Audit

Appendix E: Accessibility Worksheet

Safety Statement

Occupational Safety Statement

Belle Pulses is committed to providing a safe environment for all employees, visitors and customers. This will be achieved by managing risks and safety through a robust Internal Responsibility System (IRS). This means Involving Stakeholders, Instituting Standards, Identifying Hazards, Investigating Incidents, Improving Conditions and Informing Staff of safety risks and mitigations, toward making Incremental Changes. We are also committed to adhering to all legislative regulations.

All employees are responsible for ensuring a safe workplace and reporting all incidents. In most cases, this involves: 1) responding to the immediate risk, 2) informing a supervisor of the incident, 3) documenting the incident using reporting forms, 4) investigating the incident or determine a root cause and 5) providing feedback or corrective action. The Employer is responsible for: 1) Reviewing the complaint, 2) Assigning an investigator and 3) Implementing resolutions or recommendations and providing the resources needed to maintain a safe environment.

Anti-Harassment, Discrimination and Violence Strategy

Belle Pulses will ensure a harassment, discrimination and violence free workplace using our Internal Responsibility System to train employees, identify risks, investigate occurrences and respond to contraventions.

Employees will receive initial training on our policies during the new hire orientation, continued refresher at monthly “toolbox” staff meetings and responsive development when risks are identified. We will identify risks to harassment, discrimination and violence through annual safety audits, performance management processes and management meetings. Occurrence of harassment, discrimination and violence will be investigated using the Belle Pulses bon fide investigation process, where applicable. We will also act swiftly 1) when occurrences warrant action - up to and including employee termination, and 2) when employees require protection or support to recover from harassment, discrimination or violence. Belle Pulses will also conduct any and all reporting required by law or regulation.

Respectful Workplace Statement

It is the duty of all employees to maintain and encourage a respectful workplace. All employees are required to show courtesy to all employees, customers, visitors and suppliers of the Company. This should be done by maintaining a positive attitude, showing kindness and compassion and exercising respectfulness. Along with discrimination and harassment avoidance, this behavior will help ensure a meaningful and comfortable working environment for all.

Appendix B:

Social Responsibility, Ethics and Inclusion Statement

Belle Pulses Ltd is committed to the highest standards in Social Responsibility, Ethics and Inclusion in all that we do. This is achieved by adhering to the Laws of the country of Canada, partnering with like minded stakeholders, creating a safe work environment and maintaining fair, equitable labour practices.

1. In all Corporate Social Responsibility (CSR) Rating systems, Canada is rated as a low risk. These CSR rating systems rate a countries risk for contraventions of Environmental, Legal and Labour regulations. Belle Pulses Ltd as a Canadian Business adheres to all laws and meets or exceed all regulatory requirements.
2. Belle Pulses Ltd prides itself on partnering with suppliers, customers and employees that share our values of social responsibility, ethics and inclusion. By conducting periodic audits, maintaining a code of conduct and ensuring the highest level of business ethics including anti-corruption, we are a business partner of choice.
3. Using a robust internal responsibility system, Belle Pulses Ltd creates and maintains a safe work environment for its employees. We manage occupational safety, product safety and psychological safety by Instituting Standards, Identifying Hazards, Investigating Incidents, Improving Conditions and Informing Staff – our continuous improvement methodology.
4. Belle Pulses Ltd is an employer of choice in the communities that we do business. We offer: 1) a living wage, 2) provide fair and equitable work conditions, 3) free from discrimination and harassment, 4) intentionally diverse and inclusive, and 5) provide an equal opportunity for growth and advancement to all employees.

Championed by the Leadership Team, Belle Pulses Ltd provides an environment of equal opportunity and avoids direct and indirect discrimination in processes and function. Furthermore, it is our desire to create a thriving, diverse workplace and workforce that positively impacts community and customer, while achieving organizational goals. Our Diversity, Equity and Inclusion policy is designed to protect all employees, customer, suppliers and stakeholders on all legislated grounds of protection.

Indigenous Inclusion Statement

At Belle Pulses Ltd, we believe we are all treaty people and it is our duty and honour to be active participants in indigenous reconciliation in Canada. We are thankful each day that we are able to operate on Treaty Land. We support and endeavour to implement appropriate Truth and Reconciliation Commission Calls to Action and work in the spirit of the United Nations Declaration on Indigenous Peoples. We acknowledge and respect that Indigenous peoples have unique constitutional rights in Canada and a traditional world view. This means fostering meaningful relationships, built on trust and respect, which bring together Indigenous and corporate communities to create shared value. We are committed to approaching and building these relationships with genuine care, kindness, and respect.

Appendix C:

Workplace Accessibility Survey

As a Federally Regulated employer, Belle Pulses is required to create an Accessibility Action Plan. This Plan is designed to remove barriers to employment. Please complete this brief un-identifying survey and place it in the suggestion box.

“A barrier to employment is anything that prevents women, Indigenous Persons, visible minorities or disabled candidates or employees from participating fully and equally in work/society. Such as: lack of ramps, complexity of work, discrimination or excessively high requirements. A “disability” is any physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation.”

#	Questions		
1	Have you noticed any written or unwritten policy or procedure that prevents anyone from securing employment or working with Belle Pulses.	Yes	No
2	Have you noticed a physical barrier that prevents anyone from securing employment or working with Belle Pulses.	Yes	No
3	Have you noticed an incident of Discrimination at Belle Pulses.	Yes	No
4	Have you noticed any Belle Pulses work responsibilities that pose a barrier to employment or work for individuals with disabilities.	Yes	No
5	Have you noticed any Belle Pulses training, program and service that is inaccessible.	Yes	No
6	Have you notice any Belle Pulses information, communication or technology that is inaccessible for persons with disabilities.	Yes	No
7	Please Comment:		

For classification purposes, please complete (circle) the following:

Do You Identify As: Male / Female / Other

Do You Identify As A : Visible minorities / Indigenous Peoples / Neither

Do you have a disability of any kind (Physical, Mental, etc): Yes / No

Annual Accessibility Audit

The following audit should be done annually to ensure that accessibility standards are maintained, new issues are identified and status of improvements are recorded. This audit should be completed by a human resources, safety or management representative. The results will be used to complete the Federal Government reporting that is required every 3 years.

Employment

- ☐ Recruitment is done through an accessibility lens including women, visible minorities, indigenous peoples and people with disabilities.
- ☐ All job requirements are Bona-fide and specific so they are not a barrier to employment.
- ☐ All employees are onboarded and trained to ensure their work readiness and success.
- ☐ Maintain and education staff of Safe, Diverse, Equitable, Inclusive and Accessible workplace policies.
- ☐ Managers are aware and trained on our Accommodation policy and process.
- ☐ Adaptive / Accommodation tools are available for employees when needed.
- ☐ Feedback from all employees is welcomed and considered in making the workplace better.

Comments:

Built Environment

- ☐ Important signage is clearly and prominently visible.
- ☐ A list of available adaptive and accessibility tools and resources is available to employees.
- ☐ Employees are aware and trained on Emergency Response, appropriate to their job.
- ☐ Employees are trained and re-certified on job and workplace safety.
- ☐ Job specific accessibility features are available such as ramps and railings.

Comments:

Communication and Information & Communication Technology

- ☐ Adaptive and accessibility information technology tools are available
- ☐ Feedback from women, visible minorities, indigenous peoples and people with disabilities, regarding adaptive and accessibility needs, is received.
- ☐ When requested, alternative content/information formats (such as: large print and audio/video formats) are available.
- ☐ When Possible, Information and training are provided digitally, in an accessibility flexible manner.

Comments:

Procuring Goods, Services and Facilities

- ☐ Accessibility is considered when purchasing goods, services and facilities.
- ☐ A list of pre-approved accessibility friendly vendors, goods and services is available.

Comments:

Designing and Delivering Programs and Services

- ☐ Where appropriate women, visible minorities, indigenous peoples and people with disabilities are consulted with prior to designing and delivering programs and services.
- ☐ Research into accessibility standards and how they can impact our workplace is periodically conducted.
- ☐ Accessibility is considered relative to business imperatives such as food safety regulations and grain processing regulations, established by either industry or legislation
- ☐ Vendor or Customer requests for social responsibility and accessibility queries are responded to promptly

Comments:

Transportation

- ☐ Staff are aware of transportation accessibility consideration and work to maintain standards.
- ☐ All roadways and walkways are cleared of snow, debris and obstacles.
- ☐ Transportation accessibility considerations are reviewed, prior to transport

Comments:

I authorize this report to be true and complete to the best of my knowledge.

Signature

Date

Appendix E:

Accessibility Worksheet

As a Federally Regulated employer, Belle Pulses is required to create an Accessibility Action Plan. The Accessibility Plan is designed to remove barriers to employment. Please complete this worksheet to assess any Accessibility feature.

“A barrier to employment is anything that prevents women, Indigenous Persons, visible minorities or disabled candidates or employees from participating fully and equally in work/society. Such as: lack of ramps, complexity of work, discrimination or excessively high requirements. A “disability” is any physical, mental, intellectual, cognitive, learning, communication or sensory impairment or functional limitation.”

Location:		Date:
Accessibility Area:		
Item:		

#	Questions/Comments		
1	Description of Workplace Item:		
2	How would accessibility be improved?		
5	How would addressing this feature improve accessibility?		
6	Is this change reasonable? What are the limitations?	Yes	No
7	Comments and Determination:		
	Approved?	Yes	No

Assessor: _____ Date: _____