Doug Tarry Limited Accessibility for Ontarians with Disabilities Act [AODA] Policy

Section: Administration	Policy Number: 003
Sub-section: Human Resources	Effective Date: January 1, 2015
Subject: Multi-Year Plan - Integrated Standards	Revision Date:
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The Integrated Accessibility Standards Regulation (IASR) under the *Accessibility for Ontarians with Disabilities Act* (AODA) requires Doug Tarry Limited, hereinafter referred to as "The company" to develop a multi-year plan every five years to prevent and remove barriers for persons with disabilities.

Every five years, *The Company*, sets a course to prevent, identify and remove barriers for persons with disabilities. We aim to become barrier-free through this multi-year accessibility plan, by 2025, based on the following accessibility standards in:

- 1. General Requirements of the Regulation
- 2. Information and Communications
- 3. Employment
- 4. Transportation [Exempt]
- 5. Built Environment

The *Accessibility for Ontarians with Disabilities Act* (AODA) requires *The Company* to develop, implement, and enforce accessibility standards so that goods, services, facilities, employment, buildings, structures, and premises are accessible to persons with disabilities.

This multi-year accessibility plan outlines the specific steps *The Company* is taking to improve opportunities for persons with disabilities, comply with the phased-in requirements of the Regulation, remains committed to improving accessibility through the identification, removal and prevention of barriers in our organization.

It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA. It will be provided in an alternative format upon request.

In accordance with the requirements, *The Company* will:

- 1. Provide all information relating to the plan in alternative formats upon request;
- 2. Review and update the plan at least once every five years.

From 2012-2017, *The Company* will continue to comply with the Accessibility Standards for Customer Service Regulation and continue to implement initiatives to enhance accessibility in other areas under the Integrated Accessibility Standards Regulation, Standards for Employment, Information and Communications.

This section includes a summary of the initiatives *The Company* implemented on or before and will continue to implement from 2012 - 2017.

1. STANDARDS FOR CUSTOMER SERVICE

The Company met compliance with the requirements set out in the Accessible Customer Service Standard Regulation by:

- 1.1. Establishing policies, procedures and practices for providing goods and services to persons with disabilities.
- 1.2. Providing accessibility awareness, AODA and customer service standard training to all staff who interact, or may interact, with persons with disabilities of behalf of the company or are involved in the creation and implementation of policies, practices and procedures for the company.
- 1.3. Reviewing customer service feedback forms in print and online and providing alternate formats in large print and text formats.
- 1.4. Developing a notification service disruption protocol, and communicated the customer service policy to staff so that support persons and service animals are permitted onto our premises.
- 1.5. Creating a customer service policy that highlights information about accessibility requirements under the AODA including policies, guidelines and mandatory and recommended training requirements for staff and management.
- 1.6. Reporting compliance to the customer service standard on the Accessibility Compliance Reporting tool at *ServiceOntario's ONe*-Source for Business website.
- 1.7. Tracking attendance for accessibility training courses.
- 1.8. Instructions were provided to staff regarding evacuation in times of emergency to gather at locations that are accessible.
- 1.9. Persons with disabilities were consulted to ensure that we meet the needs of all persons with disabilities in our emergency response plan, and that public safety information and instructions are provided in a timely manner if an emergency or disaster occurs.

- 1.10. Departments were instructed to identify persons in need of assistance in advance of an emergency to discuss the location of the designated waiting areas are how identified persons will be escorted out.
- 1.11. The emergency response plan and public safety information and instructions were reviewed and modified to take the needs of persons with various disabilities into consideration.
- 1.12. The emergency procedures have been updated to ensure they can be followed by customers or employees with disabilities.
- 1.13. Individualized workplace emergency response information has been made available to employees who have disclosed a disability, and such employees will be accommodated according to their disability if and when an emergency or disaster occurs. These individualized plans have been communicated to their managers and recorded in their personnel files.
- 1.14. The company has instituted a "buddy system" in which a designated individual provides assistance to a specific disabled employee, with the disabled employee's prior consent, to help him evacuate the workplace in case of an emergency or disaster.
- 1.15. Employees have been trained on the emergency response plan and/or public safety information and instructions to ensure that they know how to interact with persons with disabilities, employees and customers, during an emergency, incident or dangerous situation.
- 1.16. Individualized emergency response information is reviewed when:
 - 2.1.1. An employee moves to a different location in the organization;
 - 2.1.2. An employee's overall needs or plans are reviewed; and
 - 2.1.3. When reviewing general emergency response policies.

Note:

The information and communications standard only requires that organizations make their emergency response policies available to the public if they have such policies. It also does not require the use of both official languages.

Required legislative compliance: January 1, 2012 Implementation timeframe: September 2011 to January 1, 2012 Completion date: January 1, 2012

GENERAL REQUIREMENTS

The company is committed to achieving accessibility through meeting the Integrated Accessibility Standards [IASR] requirements, by:

1. Identification of barriers.

The company's will assess physical, attitudinal and communication barriers across the company to ensure that we remove and prevent barriers to access for persons with disabilities in our organization.

2. **Planned action(s)**

The company's IASR policy and statement of commitment will be made available to the public on the premises.

3. The company's IASR policy and statement of commitment will be available in an accessible format upon request. We will consult with the person with a disability when identifying the appropriate format.

Required legislative compliance: January 1, 2014 Implementation timeframe: January 2012 to January 1, 2014 Completion date: January 1, 2014

2. STANDARDS FOR INFORMATION AND COMMUNICATIONS

The company is committed to making company information and communications accessible to people with disabilities. The information we provide and the ways we communicate are key to delivering our goods, programs and services to the public.

2.1. The company will incorporate new accessibility requirements under the information and communications standard to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities and provide necessary communication supports in a timely manner.

2.2. Identification of barriers

The company's will assess its communication methods and attitudes to identify and remove barriers to information and communications with people with disabilities. Potential barriers include:

- 2.2.1. Lack of a method to obtain user feedback on accessibility;
- 2.2.2. In accessible PDF documents and forms;
- 2.2.3. In accessible HTML forms

2.3. **Planned action(s)**

To meet compliance with the Accessibility Standards for Information and Communications under the IASR requirements and remove barriers to persons with disabilities, the company will:

- 2.3.1. Upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs;
- 2.3.2. identify problems and provide recommendations for PDF documents and forms;
- 2.3.3. Provide, upon request, accessible formats and communication supports for receiving and responding to feedback from persons with disabilities;

2.4. Feedback

Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request

- 2.4.1. Consult the person making the request to determine suitability of format;
- 2.4.2. Notify the public about the availability of accessible formats and communication supports.

Required legislative compliance: January 1, 2016 **Implementation timeframe**: January 2012 to January 1, 2016

3. STANDARDS FOR EMPLOYMENT

The Company is committed to fair and accessible employment practices that attract and retain qualified employees with disabilities.

3.1. Recruitment.

The company's will incorporate new accessibility requirements under the employment standards to ensure that barriers in recruitment are eliminated and corporate policies are followed where applicable.

3.2. Identification of barriers

The company will assess recruitment policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

3.3. Planned action(s)

To meet compliance with the *Accessibility Standards for Employment* under the Integrated Regulation requirements and to remove barriers to persons with disabilities in recruitment, the company will:

- 3.3.1. Notify employees and the public about the availability of accommodation in its recruitment processes for applicants with disabilities;
- 3.3.2. Inform candidates about the availability of accommodations:
 - 3.3.2.1. when called for an interview;
 - 3.3.2.2. during the selection process;
 - 3.3.2.3. at the time of job offer;

3.3.2.4. at orientation.

- 3.3.3. If the selected applicant requests an accommodation, consult with the applicant and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs;
- 3.3.4. When making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities.

3.4. Training

The company is committed to implement a process for ensuring that all employees, volunteers, persons who deal with customers and the public on the company's behalf, and persons participating in the development and approval of the company's policies, practices and procedures receive the appropriate training that meets the requirements under the Integrated Regulation.

3.4.1. Identification of barriers.

The company will ensure that meetings and training sessions are accessible for employees with learning and other disabilities.

3.5. Planned action(s)

The company will:

- 3.5.1. provide training on the requirements of the Integrated Regulation and on the *Human Rights Code* as it pertains to persons with disabilities to all employees, volunteers, contractors, other third parties who interact persons with disabilities on behalf of the company and persons involved in the creation of policies
- 3.5.2. Keep and maintain a record of the dates when training is provided and the number of individuals to whom it was provided
- 3.5.3. Ensure that training is provided on the requirements of the accessibility standards
- 3.5.4. Provide training in respect to any changes to policies on an ongoing basis

3.1. Support information for employees.

The company will incorporate new accessibility requirements under the employment standards to ensure that barriers in information that supports employees are eliminated and corporate policies are followed where applicable.

3.2. Identification of barriers

The company will assess its supporting documents, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

3.3. Planned action(s)

To meet compliance with the *Accessibility Standards for Employment* under the Integrated Regulation requirements and to remove barriers to persons with disabilities, *The Company* will:

- 3.3.1. Inform current employees and new hires soon after they begin employment of *The* Company's policies supporting 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
- 3.3.2. Provide information under this section to new employees as soon as practicable after they begin their employment
- 3.3.3. Keep employees up to date on changes to policies
- 3.3.4. Provide accessible formats and communication supports to any employees who request them. If requested, the employer will consult with the employee to provide or arrange for provision of accessible formats and communication supports for:

3.3.4.1. information that is needed in order to perform the employee's job

3.3.4.2. information that is generally available to employees in the workplace

4. Documented individualized return to work plan, accommodation plan

4.1. Commitment

The Company will incorporate new accessibility requirements under the employment standard to ensure that barriers in accommodation and other plans that support employees are eliminated and corporate policies are followed where applicable.

4.2. Identification of barriers

The Company will assess its return-to-work and accommodation plans, policies,

practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

4.3. Planned action(s)

To meet IASR compliance requirements and remove barriers to persons with disabilities, *The Company* will:

- 4.3.1. Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan;
- 4.3.2. Include in the process the means by which the employee is assessed on an individual basis;
- 4.3.3. Provide an individualized accommodation plan in writing to any employee with a disability;
- 4.3.4. Include in the process the manner in which the employer can request an evaluation by an outside medical or other expert, to assist the employer in determining if and how accommodation can be achieved;
- 4.3.5. Provide an individualized return-to-work plan in writing for any employee who has been absent from work due to a disability and requires disability-related accommodations to return to work;
- 4.3.6. Include in the process the manner in which the employee can request participation of a representative from his or her bargaining agent;
- 4.3.7. Take steps to protect the privacy of the employee's personal information;
- 4.3.8. Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which it will be done;
- 4.3.9. Provide the employee with the reasons for the denial if the individual accommodation plan is denied;
- 4.3.10. Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility, needs include any individualized workplace emergency response information;
- 4.3.11. Identify any other accommodation that is to be provided to the employee.

5. Performance assessment, career development, advancement, and redeployment.

5.1. Commitment

The Company will incorporate new accessibility requirements under the employment standards to ensure that barriers in performance assessment, career development and advancement, and redeployment are eliminated and corporate policies are followed where applicable.

5.2. Identification of barriers

The Company will assess its performance reviews, career development and advancement, redeployment programs, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

5.3. Planned action(s)

To meet compliance with the *Accessibility Standards for Employment* under the Integrated Regulation requirements and to remove barriers to persons with disabilities, *The Company* will:

- 5.3.1. Take the accessibility needs of employees with disabilities and their individualized accommodation plans into account:
 - 5.3.1.1. when assessing their performance;
 - 5.3.1.2. in managing their career development and advancement;
 - 5.3.1.3. when redeploying them;
 - 5.3.1.4. Review and revise its performance review policy;
 - 5.3.1.5. Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities;
 - 5.3.1.6. Take into account the accessibility needs of employees with disabilities when re-deploying employees.

Required legislative compliance: January 1, 2017 **Implementation timeframe**: January 2012 to January 1, 2017