

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Policy completed; reviewed on an annual basis.	Posted and placed on the Valiant website.	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, <ul style="list-style-type: none"> a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years. 	Multi-Year Accessibility Plan completed and subject to review at least once every five (5) years,	Posted on the Valiant website.	January 1, 2014
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	N/A	N/A	January 1, 2014

7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	The Company provided on-line AODA Training to the affected Team Members as well as overview training to all Team Members through the Safety Talk activity.	Completed and continuing through the Safety Talk activity.	January 1, 2015
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PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Incorporation of related process information on Team Member surveys on a “go forward” and ongoing basis; awareness information regarding the need for accessible formats and communication supports upon request.	Completed through on-line training and the Safety Talk process: survey activity pending	January 1, 2015
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person’s accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	The Company shall provide the requisite support in a timely manner upon request.	Support provided upon request	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	The Company shall consult the affected person requesting support in a timely manner upon request.	Consultation and support provided upon request	January 1, 2016

PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Include a statement in job advertisements confirming that the Company is an “Equal Opportunity Employer”; recruit and accept candidate information in a range of formats including electronic and mail-in submissions.	Completed	January 1, 2016
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.	Candidate notification by e-mail or by telephone, referencing the provision of accommodation support as required; including accessible interview rooms and timing flexibility with respect to accommodation needs.	Completed	January 1, 2016
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Add the statement to all offers of employment	Completed	January 1, 2016

25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its 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.	<p>Posting of the AODA Policy in all facilities and on the Company's website</p> <p>AODA training presentation to affected Team Members via Lotus Notes</p> <p>A "Safety Talk" on the AODA and its requirements to all Team Members on a regularly scheduled basis</p>	Completed	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Addition of the AODA Policy as a reviewed document at the scheduled New Team Member Orientation sessions.	Completed	January 1, 2016
25		25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Available upon request and as required	Completed	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>Provide information required to support the assigned accountability (position descriptions, work instructions, etc.) in a suitable format; available upon request.</p> <p>Provide information generally available to others in the workplace in a suitable format; available upon request.</p>	Completed	January 1, 2016

26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Meet, upon request, with the affected Team Member to determine the suitable format or support delivered in a courteous and helpful manner.	Completed	January 1, 2016
27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Through the "Safety Talk" communication process, inform Team Members that if they need accommodation in the event of a workplace emergency, they need to advise the Leadership.	Completed	January 1, 2012
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Advise safety "sweep team" members as referenced in the Company's Emergency Preparedness Plan.	Completed	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Provide a timely response (twenty-four (24) hours); available upon request.	Completed	January 1, 2012

27		<p>(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> (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. 	<p>Communicate the individualized accommodation plan to new manager, upon the assignment change.</p> <p>Review the Emergency Preparedness Plan as changes occur.</p>	Completed	January 1, 2012
28	Documented Individual Accommodation Plans	<p>28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<p>Integration of the process to the Early and Safe Return to Work (ESRTW) work instruction.</p>	Completed	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 	<p>Integration of the Accommodation Process content into ESRTW work instruction.</p>	Completed	January 1, 2016

		<p>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	Revised the existing ESRTW process to reflect the accommodation requirement.	Completed	January 1, 2016

29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	See above.	Completed	January 1, 2016
29		<p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>	Review of the <u>OHSA</u> , O.Reg 851, <u>WSIA</u> , etc. to ensure continued compliance.	Completed	January 1, 2016
30	Performance Management	<p>30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<p>The Company shall provide accessible written and oral versions of its Performance Management Process (PMP), as requested.</p> <p>Similarly, the Company shall provide assessable formats when communicating performance expectations (progressive corrective actions), upon request, to those Team Members with individual accommodation plans.</p>	Completed	January 1, 2016
31	Career Development & Advancement	<p>31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	See the above commentary.	Completed	January 1, 2016

32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	See the commentary in Section 30.	Completed	January 1, 2016
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PART IV.1 – Built Environment

Section	Initiative	Description	Action	Status	Compliance Date
80	Meet the <i>Accessibility Standards for the Design of Public Spaces</i> when building or making modifications to public spaces	Public spaces applicable to our organization include: <ul style="list-style-type: none"> a) outdoor paths of travel such as sidewalks, ramps, stairs, curb ramps, off-street parking b) service related elements such as reception, waiting areas 	<p>Ensure that, as applicable, newly constructed or redeveloped public spaces will meet the <u>AODA</u> Built Environment requirements.</p> <p>Ensure staff responsible for a public space understands and follows the requirements.</p>		January 1, 2017