

Appendix A Multi-Year Accessibility Plan

General Requirements

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
3	Establishment of Accessibility Policies	<p>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.</p> <p>Sec. 3(2) Shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities.</p> <p>Sec. 3(3) Prepare one or more written documents describing its policies.</p>	Establish Policy	HR	Complete	03-17-20
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>AODA Compliant checker.</p> <p>HR to identify barriers.</p> <p>Sr. Team Approval / Approved</p> <p>Notify IT and/or Corporate Communications.</p> <p>HR to review January every year. Multi-year accessibility plan will be updated at least once every five years.</p>	<p>HR</p> <p>HR</p> <p>HR</p> <p>HR</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Ongoing</p>	03-17-20
6	Self-service kiosks	<p>2. Large Organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.</p>	<p>Consider including procurement terms in any kiosk purchase contracts to provide for potential accessibility issues.</p> <p>At this time we are not aware of any kiosks being utilized. Should this change in the future, Hayward Gordon will ensure requirements are met.</p>	<p>Management</p> <p>Management</p>	Ongoing	01-01-16

7	Training	<p>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,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>To determine method of training and training levels. Classroom (shift meetings), eLearning, or a blend of inperson and eLearning.</p> <p>Training will be on the requirements of the integrated Accessibility Standards and appropriated to the duties of the individual being trained. Employees will also be trained on the Ontario Human Rights Code.</p>	HR	Complete	01-18-16
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Information and Communications Standards

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
11	Feedback	<p>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.</p>	<p>Hayward Gordon does not have a formal process for soliciting feedback from its customers. In future if this changes, Hayward Gordon will ensure the process is facilitated in a way which takes into account a variety of disabilities.</p> <p>Any feedback received will be available upon request.</p>	HR	Ongoing	03-17-20

12	Accessible Formats & Communication Supports	<p>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,</p> <p>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p> <p>12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>When requested Hayward Gordon, will provide or arrange for the provision of accessible formats for persons with disabilities.</p> <p>Ensure these formats and supports can be provided in a timely manner (ex: same time, 24 hours).</p> <p>The cost to provide communication support will not be at the expense of the customer or employee.</p> <p>Requests to be directed to Facility HR Manager.</p> <p>Communicate to staff and management of this requirement through training. Requests directed to Facility HR Manager</p> <p>Develop protocol for situations where a suitable agreement cannot be made.</p> <p>Post on website (included in Policy).</p>	HR	Ongoing	01-18-16
13	Emergency Procedures / Plan or Public Safety Information	13. (2) Obligated organizations that prepare emergency procedures, plans or public safety information and make the information available to the public shall meet the requirements	Hayward Gordon's emergency procedures/plans or public safety information that is publicly available will be made available in an accessible format upon request.	HR	Complete	03-17-20
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	Continuously review WCAG guidelines to be informed of changes and updates	IT	Ongoing Ongoing	03-17-20

Information and Communications Standards cont

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
		<p>14. (4) Designated public sector organizations and large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <p>14. (4) 1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p>	<p>Hayward Gordon did not create a new URL or change its existing website by more than 50%</p> <p>IT will be made aware of this requirement and that our website is compliant on or before the deadline of Jan. 21/21. Unless a significant refresh is made prior to that date</p>	<p>IT</p> <p>IT</p>	<p>Not Applicable</p> <p>Ongoing</p>	<p>01-18-16</p> <p>1-Jan-21</p>

Employment Standard

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
22	Recruitment	22. Every employer shall notify its employees and the public about the recruitment methods .	Several methods of recruitment are utilized by the company . Hayward Gordon will ensure when using a placement agency, that it is also meeting this requirement.	IT	Ongoing	01-18-16
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. 23.(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.	Notify applicants (telephone, email, letter, etc.) based on required accommodations advised. Identify barriers: location of interview room, room set up for in person interviews, interviewing timelines, supports, paperwork, etc. Develop interview guidelines	HR	Ongoing	01-01-19
				HR	Ongoing	01-01-19
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.	Hayward Gordon will notify the successful applicant(s) of our policies for accommodating employees with disabilities. All new hires receive written offers of employment with this information.	HR	Complete	01-01-19
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. 25.(2) Employers shall provide the information required under this section to 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.	Circulate policy, training, and staff announcements.	HR	Complete	01-18-16
			Information required is communicated during new	HR	Complete	01-18-16
			See 25 (1).	HR	Complete	01-18-16

Employment Standard cont.

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
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>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Upon request Hayward Gordon will consult with an employee with a disability to determine which accessible formats or communication supports they require to perform their duties of their job.	HR	Ongoing	01-01-19
27	Workplace Emergency Response Information	<p>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.</p>	Process developed.	HR	Complete	01-01-19
		<p>(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.</p>	Part of the process with employee's consent.	HR	Complete	01-01-19
		<p>(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.</p>	Part of process.	HR	Complete	01-01-19
		<p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	Part of process.	HR	Complete	01-01-19

Employment Standard cont

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
28	Documented Individual Accommodation Plans	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.	Develop process.	HR	Complete	01-01-19
		<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. 5. The steps taken to protect the privacy of the employee's personal. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. <p>If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <ol style="list-style-type: none"> 7. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 	Individual accommodation plan for any employee who has been identified as having a disability. Hayward Gordon may initiate a dialogue to offer assistance for employees who are clearly unwell or perceived to have a disability. The employee will be included in the development of the plan. The accommodation plane will be reviewed when there is a change in the employee's disability or job.	HR	Complete	01-01-19
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> <p>29. (2) The return to work process shall,</p>	Hayward Gordon has developed and has in place a return to work process.	HR	Ongoing	01-01-19

Employment Standard cont

Section	Initiative	Description	Action	Responsible	Status	Compliance Date
29		<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> <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>				
30	Performance Management	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.	Hayward Gordon will consider the accessibility needs of employees with disabilities in the area of performance management.	HR	Ongoing	01-01-19
31	Career Development & Advancement	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>Hayward Gordon will take into account accommodations employees with disabilities may need to succeed elsewhere in the company and to take on new responsibilities within their current position.</p> <p>If the employee has an individual accommodation plan in place, the plan will be updated to reflect the changes in their new responsibilities.</p>	HR	Ongoing	01-01-19
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.	Hayward Gordon will take into account accommodations employees with disabilities may need to succeed elsewhere in the company and to take on new responsibilities within their current position.	HR	Ongoing	01-01-19
80	Public Spaces	80.2 (1) Except as otherwise specified, this Part applies to public spaces that are newly constructed or redeveloped on and after January 1, 2017.	Hayward Gordon will comply with the AODA Design of Public Spaces Standards when undertaking new construction or planned significant alterations of public spaces.	Management	Ongoing	01-18-16