

# NIAGARA'S FINEST HOTELS

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)

*Multi-year plan for the Integrated Accessibility Standards*

*January 1, 2014*

TITLE	AODA STANDARD	ACTION PLAN	STATUS	NOTES
<b>PART 1 - GENERAL</b>				
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 referred to in the Regulation.</p> <p>3.(2) organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.</p> <p>3.(3) organizations shall, (a) prepare one or more written documents describing its policies; and (b) make the documents publicly available, and shall provide them in an accessible format upon request.</p>	<p>Update HR Standard and Procedure #C.22: Customer Service for Guests with Disabilities and/or Create New Policy</p> <p>Embed in policy</p> <p>Policy to be posted on website or provided in an acceptable format upon request</p>	Complete	January 1, 2014
Accessibility Plans	<p>4.(1) large organizations shall, (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 the Regulation; (b) post the accessibility plan on their</p>	<p>Develop multi-year plan Post to website Review every 5 years</p>	Complete	January 1, 2014

	<p>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>			
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 <i>Human Rights Code</i> 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>7.(2) The training on the requirements of the accessibility standards and on the <i>Human Rights Code</i> referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.</p> <p>7.(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7.(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>7.(5) The Government of Ontario, the Legislative Assembly, every designated organization shall keep a record of the training provided under this section,</p>	<p>Criteria was incorporated into the Company's General Orientation Program in the Fall of 2012. All new employees and volunteers and coop students are required to attend General Orientation</p> <p>Department specific training was developed and conducted and form part of each Departments Standard Operating Procedures. New employee receive training as part of their Department Specific Primary Training</p> <p>All staff were trained in Accessibility for Ontarians with Disabilities in the Fall of 2012</p> <p>Training will be conducted as required for changes on an ongoing basis</p> <p>Written records of training are kept at Orientation, Primary Training and all other training that is conducted</p>	Complete	January 1, 2015

	including the dates on which the training is provided and the number of individuals to whom it is provided.			
<b>PART II - INFORMATION AND COMMUNICATIONS STANDARDS</b>				
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 the provision of accessible formats and communications supports, upon request.</p> <p>11.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Feedback process has been developed and forms part of the Company's Policy #C.22 - Customer Service for Guests with Disabilities. The current Feedback process will be reviewed with General Managers and VP of Sales to ensure accessibility.</p>	Complete	January 1, 2015
Accessible formats and communication supports	<p>12. (1) 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.</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 organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>All requests will be documented and access format determined. A process to meet this requirement will be developed.</p> <p>The format will be determined in consultation with the individual making the request</p> <p>Accessible formats will be incorporated in the Policy available to the public, and communicated upon request</p>	Complete	January 1, 2016

<p>Emergency procedure, plans or public safety information</p>	<p><b>13.</b> (1) In addition to its obligations under section 12, if an organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</p> <p>(2) Organizations that prepare emergency procedures, plans or public safety information and make the information available to the public shall meet the requirements of this section by January 1, 2012.</p>	<p>Niagara's Finest Hotels will make available to its guests, customers and clients emergency information in an accessible way upon request and as soon as practical in a manner mutually agreed upon</p> <p>Current employees with disabilities have Individual Emergency Response Plans as outlined in the Company's Emergency Preparedness &amp; Crisis Management Program</p>	<p>Complete</p>	<p>January 1, 2012</p>
<p>Accessible websites and web content</p>	<p>14. (2) 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.</p> <p>14.(4) Designated organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <ol style="list-style-type: none"> <li>1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A.</li> <li>2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ol style="list-style-type: none"> <li>i. success criteria 1.2.4 Captions (Live), and</li> <li>ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ol> </li> </ol>	<p>Will meet requirements within the specified timeframe</p>		<p>January 1, 2014 For new websites</p> <p>January 1, 2021 for all internet websites</p>

<b>PART III – EMPLOYMENT STANDARDS</b>				
Recruitment, general	<b>22.</b> Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Will include in job postings and all advertisements that workplace accommodations will be made available to those who are disabled	Complete	January 1, 2016
Recruitment, assessment or selection process	<b>23.</b> (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.	Interviews will offer accommodation supports to candidates being interviewed and will provide such accommodation support upon request  Accommodation supports will be mutually agreed upon	Complete	January 1, 2016
Notice to successful applicants	<b>24.</b> Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Written offers of employment will include our policy on accommodating employees with disabilities. Draft language to be used	Complete	January 1, 2016
Informing employees of supports	<b>25.</b> (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.	Will include information on Company "Innsights" and Employee Newsletter for existing employees	Complete and ongoing	January 1, 2016

	<p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>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.</p>	Will include information in Company Orientation for new employees		
Accessible formats and communication supports for employees	<p><b>26.</b> (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>	When accessible formats and communication supports are requested, and in a timely manner, and in consultation with the person making the request, arrangements for accessible formats and communication supports will be made taking the persons disability needs into account at no cost to the person making the request	Complete	January 1, 2016
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> <p>(2) If an employee who receives individualized workplace emergency</p>	<p>Individualized workplace emergency response information procedures have been developed for employees with disabilities.</p> <p>Workplace Emergency Response Information forms have been prepared for employees who have disclosed a disability.</p>	Complete and ongoing	January 1, 2012

	<p>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> <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> <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> <p>(5) Every employer shall meet the requirements of this section by January 1, 2012.</p>	<p>Where required, assistance is provided to disabled employees with the disabled employee's prior consent, to assist them to evacuate the workplace in the event of an emergency or disaster.</p> <p>Emergency plans have been communicated to the employees' respective managers and supervisors.</p> <p>On an ongoing and regular basis, Niagara's Finest Hotels will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed</p>		
<p>Documented individual accommodation plans</p>	<p><b>28.</b> (1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can</li> </ol>		<p>Complete</p>	<p>January 1, 2016</p>

<p>Return to work process</p>	<p>request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <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 information.</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> <p>(3) Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) identify any other accommodation that is to be provided.</p>	<p>Develop a return to work process and communicate to all employees.</p> <p>Method of communication to be determined.</p>		
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	<p><b>29.</b> (1) Every employer</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>(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 documented individual accommodation plans, as described in section 28, as part of the process.</p> <p>(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>			
Performance management	<p><b>30.</b> (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>(2) In this section, "performance management" means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.</p>	Niagara's Finest Hotels will take into account the accessibility needs of employees with disabilities when conducting performance management reviews.	Complete	January 1, 2016
Career development and advancement	<p><b>31.</b> (1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with</p>	Niagara's Finest Hotels will take into account the accessibility needs of disabled employees and individual accommodation plans when providing	Complete	January 1, 2016

	<p>disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</p> <p>(2) In this section, “career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.</p>	career development and advancement opportunities		
Redeployment	<p>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.</p> <p>(2) In this section, “redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.</p>	Niagara’s Finest Hotels will take into account the accessibility needs of disabled employees and individual accommodation plans when redeploying disabled employees	Complete	January 1, 2016
<b>DESIGN OF PUBLIC SPACES</b>				
New buildings and major renovations	Should the company build new or make major changes to existing elements of public spaces.	Vintage Hotels will comply with the requirements of the Amendments to Ontario’s Building Code		January 1, 2015