

**MULTI YEAR ACCESSIBILITY PLANS (AODA)**

Supersedes: Policy Dated 01-Jan-14

Effective Date: 01-Mar-15

PURPOSE

The purpose of this Statement of Policy and Procedure is to create a workable multi-year accessibility plan that outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Integrated Regulation. This plan will meet the needs of all customers and employees with disabilities, and provide a mechanism for planning, reviewing and evaluating the implementation of the AODA Accessibility Standards.

SCOPE

This policy applies to all Dart Canada Inc. ("Dart") employees.

POLICY

Dart will establish, implement and maintain a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements.

The multi-year accessibility plan will indicate how Dart intends to implement the requirements of the Integrated Regulation within legislated timelines. It will also address the identification, removal and prevention of barriers to people with disabilities in the organization.

Specifically, the multi-year plan will:

- a) Provide a framework for developing cohesive accessibility initiatives which identify, remove and prevent barriers
- b) Set annual goals for specific improvements to accessibility
- c) Establish action plans for meeting those goals and initiating accountability at various levels
- d) Seek input and suggestions from the wider organizational community

RESPONSIBILITY

It is the responsibility of Dart to assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities.

It is the responsibility of Dart to address the identified barriers and develop a five-year plan for the removal and prevention of these barriers.

It is the responsibility of Dart to post the plan in a visible place on the premises and on the corporate website.

It is the responsibility of Dart to provide all information relating to the plan in alternative formats upon request.

It is the responsibility of Dart to review and update the plan at least once every five years.

It is the responsibility of Human Resources to:

- a) Identify and understand structures, laws, rules, policies, programs, practices and services of, or applicable to, the organization regarding accessibility and barriers to access that people with disabilities may encounter
- b) Ensure the organization meets its obligations under the AODA to develop a multi-year accessibility plan and other requirements as required under the law
- c) Develop and implement an accessibility plan that includes, among other things:
 - i. The identification and prioritization of barriers that need to be addressed as per established standards over the next year and subsequent years through consultation with people with disabilities, the community (if applicable) and employees
- d) Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates
- e) Update the multi-year accessibility plan and make it available to the general public

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- f) Act as the organization's ambassador in the elimination of barriers and promotion of accessibility
- g) Communicate all documents (e.g., policies, plans) to members of the organization's staff and ensure they are trained on accessibility issues and the policies and plans as required by law
- h) Prepare and submit the necessary reports and documentation to the organization executives and the government
- i) Examine and monitor progress to ensure the plan is being implemented accordingly and make adjustments.

DEFINITIONS

"Accessible formats" may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

"Accommodation" means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

"Communication supports" may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

"Communications" means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

"Dignity" means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

"Equal opportunity" means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

"Independence" means when a person is able to do things on their own without unnecessary help or interference from others.

"Information" includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.

"Integration" means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternative measure is necessary to enable the individual to access goods or services.

"Reasonable efforts" means taking approaches that meet the required needs of the individual.

**REFERENCES
AND RELATED
STATEMENTS
OF POLICY AND
PROCEDURE**

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards, Ontario Regulation 191/11
SPP AS 3.01 – Statement of organizational commitment

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PROCEDURES**Multi-Year Accessibility Plan**

Dart will work to improve accessibility by developing a multi-year accessibility plan that conforms to the Regulation which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the AODA and its standards.

Dart will report annually on the progress and implementation of the plan, posting this information in an obvious place on Dart premises and on Dart's website. The plan will also be provided in alternative formats upon request.

The multi-year plan must be reviewed and updated at a minimum of once every five years.

The plan will be publically posted on the website and will also be posted in a visible place.

Upon request, the plan will be provided in accessible formats.

When a person with a disability makes a request for an alternative accessible format or communication support, that person must be consulted as to their needs. The plan must be provided in a timely manner and the cost of providing the plan in an accessible format must not be more than the regular cost charged to other people.

Procuring or Acquiring Goods, Services, or Facilities

Dart will have regard to put a process in place to:

- Assess current purchasing/procurement policies, practices and procedures.
- Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so.
- Upon request, provide an explanation when it is not practical to do so.
- Make the organization's premises fully accessible.

Self-Service Kiosks

Dart will have regard to accessibility features when designing, purchasing or obtaining self-service kiosks. At this time, Dart does not use self-service kiosks, but if Dart decides to use a self-service kiosk, it will incorporate accessibility features when designing, purchasing or obtaining these kiosks.

Training

Dart will ensure that by January 1, 2015, training is provided to all employees, volunteers, persons who deal with customers and the public on Dart's behalf, and to persons participating in the development and approval of its policies, practices and procedures on the requirements of the Regulation and on the **Human Rights Code** as it pertains to persons with disabilities.

The type and intensity of training on the requirements of accessibility standards and the Human Rights Code will vary according to the duties of the employee, volunteers or others.

Dart will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

Training will re-occur when there are changes to the accessibility policies.

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Requirements Under the Information and Communications Standard**Commitment to Accessibility Policies, Practices, and Procedures**

Dart will commit to making information and communication systems and platforms accessible to persons with disabilities and address how it will be achieved.

Dart will establish an accessibility policy, procedures and practices for providing accessible information and communications that take into account a person's disability when communicating or providing information. This includes:

- Posting the policy in a visible place on the premises and on the corporate website
- Providing the policy in an alternative format upon request
- Ensuring that the cost of providing this policy in an accessible format is not more than the regular cost charged to other people
- Reviewing the policy as necessary or when there are changes to the law or to practices and procedures or when an incident/breach occurs (not required but a best practice)

Multi-Year Plan

Dart will include the requirements under the information and communications standard in its multi-year plan, which outlines the organization's strategy to provide accessible information and communications. This includes:

- Assessing barriers to information and communications systems/ platforms.
- Determining the accessibility of Dart's information components and systems.
- Establishing a practice that Dart documents be created in a structured electronic format to allow for easier conversion to accessible formats.
- Establishing a Dart standard for documents that will be as accessible as possible without need for accessible formats (i.e., font style, font size, colour contrast, plain language).
- Posting the plan on the corporate website and providing the plan in accessible format upon request.
- Reviewing and updating the plan at least once every five years.

Emergency Procedures, Plans, or Public Safety Information

Dart, in cooperation with the building manager, will:

- Assess the existing emergency response plan and procedures and any public safety information for barriers to persons with disabilities during an emergency
- Update its emergency procedures to ensure that they can be followed by persons with disabilities and to ensure they meet the needs of persons with disabilities
- Upon request, provide the information in an accessible format or with communication supports as soon as practicable
- Consult with the person with the disability in the case of a request for an alternative accessible format and communication supports
- Provide such information at not more than the regular cost charged to other people
- Review and update these procedures at least once every five years.

Feedback

Dart will ensure that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. This includes:

- When an accessible format is requested, the person making the request is consulted to determine suitability of format
- Reviewing the policy when necessary or when there are changes to the law or to practices and procedures or when an incident/breach occurs

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Providing Information and Communications in Accessible Formats and with Communications and Support

Dart will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability. This includes:

- Assessing and reviewing the communication needs of people with visual, hearing, learning, and cognitive disabilities and the barriers to communication that exist in your organization
- Explaining how you plan to produce and deliver alternately formatted material essential to Dart and your customers, and what those materials are
- Notifying the public about the availability of accessible formats and communication supports
- Consulting with a person with a disability when alternative accessible formats and communication supports are requested
- Having a process in place for customers to request and to be provided with information and communication in an accessible format and explaining when an accessible format is not feasible
- Posting this information on Dart's website or in a conspicuous place on the premises
- If the information or communications are unconvertible, upon request, the organization will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications
- Updating accessible customer service policy
- Reviewing this process at least annually or when there are changes to the law or to practices and procedures or when an incident/breach occurs

Accessible Websites and Web Content

Dart will ensure that all new websites and web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to Level AA (for all websites and content) by 2021. This includes:

- Conducting an assessment of the organization's website and testing for accessibility
- Committing and planning to make the website accessible and outline the course of actions and timelines needed to achieve web accessibility based on the results of your assessment and compliance with the law
- Obtaining tools and resources to build or make the website accessible and train the people who will use the software to make the website accessible
- Developing accessible website and Web content that conforms with WCAG 2.0 level A and eventually that conforms to the WCAG 2.0 level AA
- Monitoring website accessibility and compliance with the guidelines and the law
- Providing staff training to all employees, volunteers, and persons participating in the development and approval of Dart's policies, practices and procedures on website accessibility

Requirements Under the Employment Standard

Dart will include the requirements under the employment standard in its multi-year plan, including the following:

- Workplace emergency response information
- Assessment of barriers in employment
- Support information for new employees
- Accessible formats and communication
- Documenting individualized plans
- Performance assessment, career development, advancement, and redeployment



Workplace Emergency Response Information

Dart will provide individualized workplace emergency response information to employees who have disclosed a disability.

With the employee's consent, provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

The individualized workplace emergency response information will be reviewed:

- When the employee moves to a different location in the organization
- When the employee's overall accommodations needs or plans are reviewed, and
- When the employer reviews its general emergency response policies

Assessment of Barriers in Employment

Dart will identify, remove and prevent barriers in employment by evaluating existing policies and procedures as well as the overall workplace.

Recruitment

Dart will promote employment opportunities for the designated groups including persons with disabilities.

On Dart's website and in job advertisements, specify that accommodation is available for job applicants with disabilities.

Dart will inform candidates about the availability of accommodations:

- when called for an interview
- during the selection process
- at the time of job offer
- at orientation

Support Information for New Employees

Dart will inform employees of policies and supports for employees with disabilities as soon as practicable after new employees begin employment.

Dart will update information provided to employees as policies change.

Accessible Formats and Communication

Dart will, upon request by an employee with a disability, provide accessible formats and communication supports for information in the workplace in consultation with the employee making the request.

Document Individualized Plans

Dart will develop a written process for developing individual accommodation plans for employees with disabilities.

Dart will develop and implement a return-to-work process for employees absent due to disabilities who require accommodation to return to work.

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Performance Assessment, Career Development, Advancement, and Redeployment

By January 1, 2016, Dart will ensure that its procedures take into account the accessibility needs of employees with disabilities and their individual accommodation plans:

- When assessing their performance
- In managing their career development and advancement
- When redeploying them

Through Human Resources, Dart will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plans and initiatives will be incorporated as required. Dart will also report on performance in relation to established accessibility goals and targets.

Contact Information

If you have questions on this policy, want to provide feedback or have a complaint, contact Human Resources.