

# 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.	Draft a policy.	Complete	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, <ul style="list-style-type: none"> <li>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;</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul>	<p>Attended public workshop and completed plan.</p> <p>Identify barriers – Chief Engineer &amp; JHSC Chair Formed committee that meets every 2 months.</p> <p>Posted as of January 1, 2014.</p> <p>Committee will review Jan 2, every five year</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>	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.	Not applicable currently and will comply if/when additions happen.	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.	Sr. Managers with PC access will receive online training by April 2014. – Manager, Talent Management & Learning  All other colleagues will receive facilitated training by August 2014. – Manager, TML	Ongoing  Ongoing	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.	Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured.  Determine what accessible formats and communication supports we will provide upon request  Ensure staff and management are aware of the need to accommodate upon request (how we will do this is to be determined. Part of training?)	Ongoing	January 1, 2015
12	Accessible Formats & Communication	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of	Determine what accessible formats and communication supports we will provide to persons with disabilities	Ongoing	January 1, 2016

	Supports	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.	upon request.  Ensure these formats and supports can be provided in a timely manner (ex. Same time, 24 hours)  Communicate to staff and management that no <u>additional</u> charge is required (how we will do this is to be determined. Part of training?)		
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.	Communicate to staff and management this requirement (how we will do this is to be determined. Part of training?)  Develop protocol for situations where a suitable agreement cannot be made	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Have a sign posted in reception area  Post on website – Director of Sales & Marketing  Include notice on certain print materials (to confirm with Marketing)	Ongoing	January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated 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.	Does not apply  Involve Health and Safety		January 1, 2012

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	Ongoing	<p><b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>
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**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.	Determine “how” Include a statement in a job ad? Identify where we advertise – paper, website, bulletin board? Example: We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs.”		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.	Determine “how” to notify applicants – telephone, email, letter? May wish to designate a contact person to handle queries regarding accessibility Identify the language you will use  Identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork  Develop interview guidelines		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.	We will put a statement in hire letter We will make phone calls Write appropriate script (Notification to Successful Applicants)		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.	Circulate policy? Training? Posters All staff emails brochures		
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	TBD		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.	See 25 (1)		January 1, 2016
26	Accessible Formats & Communication Supports for Employees	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,  (a) information that is needed in order to perform the employee's job; and  (b) information that is generally available to employees in the workplace.	Functional audit of information specific to departments  Audit of regular communications		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	List what the employee will require – ie. Policy, communication supports that are available (text-to-speech,		January 1, 2016

		communication support.	braille, large print, accessible PDFs, plain language versions, closed captioning		
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.	Develop process – Director of Security  (Identification of Potential Barriers During an Emergency Response)	Ongoing	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.	Provide when applicable		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 when applicable		January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (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	Provide when applicable		January 1, 2012

		(c) when the employer reviews its general emergency response policies.			
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 Who do you need to involve?		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"> <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 request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</li> <li>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.</li> </ol>	<p>(Accommodation Process)</p> <p>(Individual Accommodation Plan)</p> <p>(Functional Capacity Assessment Form)</p>		January 1, 2016



		<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>	Established Early & Safe Return to Work Program	Complete	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>		<p>Complete</p> <p>Complete</p>	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>		Complete	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>Review current process Need to keep individual accommodation plan in mind</p>		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>	<p>Review current process Need to keep individual accommodation plan in mind</p>		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.	Review current process Need to keep individual accommodation plan in mind		January 1, 2016
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For more information regarding the following accessibility information, please contact Warren Van Vorst, Front Office Manager.

- Accessibility Policy (Customer Service Standard)**
- Integrated Accessibility Standard**
- Accessible Room and Facility Features**
- Feedback Processes of the Hotel**
- Notice of Service Disruptions**
- Emergency Procedures**

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