

STATEMENT of POLICY and PROCEDURE

Manual:	Accessibility Standards	SPP No.	AS 3.02
Section:	The Integrated Accessibility Standards	Issued:	Aug. 15, 2012
Subject:	Multi-year accessibility plans	Effective:	
Issue to:	All manual holders	Page:	1 of 17
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Issued by:	Coreana Yantha	Dated:	December 10, 2014

1 POLICY

- 1.01 HPG 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.
- 1.02 The multi-year accessibility plan will indicate how HPG 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.
- 1.03 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

2 PURPOSE

- 2.01 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.

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3 SCOPE

3.01 This policy applies to all employees and all facilities of HPG in Ontario.

4 RESPONSIBILITY

- 4.01 It is the responsibility of HPG 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.
- 4.02 It is the responsibility of HPG to address the identified barriers and develop a five-year plan for the removal and prevention of these barriers.
- 4.03 It is the responsibility of HPG to post the plan in a visible place on the premises and on the corporate website.
- 4.04 It is the responsibility of HPG to report annually on its website on its progress in implementing this plan. (This is only mandatory for the public sector and government.)
- 4.05 It is the responsibility of HPG to provide all information relating to the plan in alternative formats upon request.
- 4.06 It is the responsibility of HPG to review and update the plan at least once every five years.
- 4.07 It is the responsibility of the **Accessibility Advisory Committee and 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

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- 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:
 - 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
 - An annual action plan to eliminate barriers as per established standard and priority
- d) Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates
- e) Update the multi-year accessibility (or better yet, annual) plan and make it available to the general public
- 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 at least four times a year

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5 DEFINITIONS

- 5.01 “**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.
- 5.02 “**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.
- 5.03 “**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.
- 5.04 “**Communications**” means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.
- 5.05 “**Dignity**” means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.
- 5.06 “**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.
- 5.07 “**Independence**” means when a person is able to do things on their own without unnecessary help or interference from others.
- 5.08 “**Information**” includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.
- 5.09 “**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

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measure is necessary to enable the individual to access goods or services.

- 5.10 **“Reasonable efforts”** means taking approaches that meet the required needs of the individual.

6 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

SPP AS 3.03 – Purchasing or acquiring goods, services or facilities

SPP AS 3.04 – Self-service kiosks

SPP AS 3.05 – Accessibility and human rights training

7 PROCEDURES

7.01 **Multi-year accessibility plan**

(IASR compliance date(s): Large organizations, Jan. 1, 2014; Small organizations are exempt from the requirement to have a multi-year accessibility plan, but it is recommended they develop a written plan in the same timeline as large organization for due diligence reasons.)

HPG 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.

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

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- 7.03 The multi-year plan must be reviewed and updated at a minimum of once every five years.
- 7.04 The plan will be publically posted on the website and will also be posted in a visible place.
- 7.05 Upon request, the plan will be provided in accessible formats.
- 7.06 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.
- 7.07 **Procuring or acquiring goods, services or facilities**

(IASR compliance date(s): Large and small organizations are exempt from this requirement, but it is recommended they plan for accessibility in the procurement or acquisition of goods, services or facilities along the same timeline as large organizations.)

HPG will 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.

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7.08 **Self-service kiosks**

(IASR compliance date(s): Large organizations, Jan. 1, 2014; Small organizations, Jan. 1, 2015. N/A if organization does not use self-service kiosks.)

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

7.09 **Training**

(IASR compliance date(s): Large organizations, Jan. 1, 2015; Small organizations, Jan. 1, 2016, but they do not have to maintain a record of the dates when training is provided and the number of individuals to whom it was provided. However, for purposes of due diligence it is recommended they do so.)

HPG will ensure that by January 1, 2016 (or January 1, 2015, if a large organization), training is provided to all employees, volunteers, persons who deal with customers and the public on the company'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.

HPG 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

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policies.

7.10 **Requirements under the Information and Communications Standard**

Commitment to accessibility policies, practices and procedures

(IASR compliance date(s): Large organizations, January 1, 2014; Small organizations, January 1, 2015, but the policies, practices and procedures do not need to be in writing.)

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

HPG 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 at least annually 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

(IASR compliance date(s): Large organizations, January 1, 2014; Small organizations are exempt from this requirement; however it is

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recommended that they plan and document the process they will take to achieve accessibility in the information and communications systems.)

HPG 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 the company's information components and systems.
- Establishing a practice that company documents be created in a structured electronic format to allow for easier conversion to accessible formats.
- Establishing a company 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. (You may also consider posting the plan in a conspicuous place in the organization.)
- Reviewing and updating the plan at least once every five years.

Emergency procedures, plans, or public safety information

(IASR compliance date(s): All organizations by January 1, 2012; however, this only applies if the organization already has or is required to have emergency procedures, plans or public safety information and if it makes this information available to the public. It does not require the company to create these procedures.)

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HPG, 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

(IASR compliance date(s): Large organizations, January 1, 2015: Small organizations, January 1, 2016.)

HPG 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
- The public is notified about the availability of accessible formats and communication supports

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- Reviewing the policy at least annually 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)

Providing information and communications in accessible formats and with communications support

(IASR compliance date(s): Large organizations January 1, 2016; Small organizations January 1, 2017.)

HPG 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 your company 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 the company website or in a conspicuous place on the premises

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- 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 (not required but a best practice)
- 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 (not required but a best practice)

Accessible websites and web content

(IASR compliance date(s): Large organizations, January 1, 2014—new websites and web content on those sites must conform with WCAG 2.0 Level A, and January 1, 2021—all websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live), and success criteria 1.2.5 Audio Descriptions (Pre-recorded). Small organizations are exempt from this requirement, but it is recommended they comply with the same timeline as large organizations.)

HPG 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

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- Developing a web accessibility business case to obtain budget and resources
- 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 the company's policies, practices and procedures on website accessibility

7.11 Requirements under the employment standard

HPG 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

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Workplace emergency response information

(IASR compliance date(s): January 1, 2012.)

HPG 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

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

Recruitment

(IASR compliance date(s): Large organizations, January 1, 2016; Small organizations January 1, 2017.)

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

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

HPG 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

(IASR compliance date(s): Large organizations, January 1, 2016; Small organizations January 1, 2017.)

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

HPG will update information provided to employees as policies change.

Accessible formats and communication

(IASR compliance date(s): Large organizations, January 1, 2016; Small organizations January 1, 2017.)

HPG 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

(IASR compliance date(s): Large organizations, January 1, 2016; Small

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organizations are exempt from documentation about the individual accommodation plans and return to work process for employees with disabilities.)

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

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

Performance assessment, career development, advancement, and redeployment

(IASR compliance date(s): Large organizations, January 1, 2016; Small organizations, January 1, 2017.)

By January 1, 2016, HPG 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

7.12 Requirements under the transportation standard (not applicable)

(IASR compliance: This section only applies to you if you are a transportation organization named in the Regulation.)

- 7.13 Through its accessibility advisory committee, HPG 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. HPG will also report on performance in relation to established accessibility goals and targets.

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7.14 Contact information

If you have questions on this policy, want to provide feedback or have a complaint, the Accessibility Committee established by HPG to deal with such matters can be reached at general@trimastermfg.com or (519) 823-2661 – Coreana Yantha, Human Resources.