

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTERGRATED ACCESSIBILITY STANDARDS, O Reg 191/11 - MULTI-YEAR ACCESSIBILITY PLAN - ONTARIO

Date Last Reviewed and Updated: June 2021				
Related Policies: Accessible Customer Service Policy - Ontario, Accessible Customer Service Plan - Ontario, and Accessibility Standards Policy - Ontario				
Part I – GENERAL REQUIREMENTS				
Section	Initiative	Description	Action	Status
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 O Reg 191/11 - <i>Integrated Accessibility Standards</i> (the "Regulation")</p> <p>3(2) All policies must include a statement of organizational commitment to accessibility.</p> <p>(3) Every obligated organization shall,</p> <p>a) prepare one or more documents describing the policies it developed under subsection (1); and</p> <p>b) make the documents publicly available and, on request, provide them in an accessible format.</p>	Our Accessibility Standards Policy - Ontario is complete and is posted internally and available in all Ontario locations.	Completed.
4(1)(a)	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>	This multi-year accessibility plan has been implemented and is maintained.	Completed.
4(1)(b)	Accessibility Plans	<p>4(1) Large organizations shall:</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request.</p>	Completed. Requests for accessible formats will be handled on a case-by-case basis.	Completed and Ongoing.
4(1)(c)	Accessibility Plans	<p>4(1) Large organizations shall:</p> <p>c) review and update the accessibility plan at least once every five years.</p>	The Vice President Human Resources will review this multi-year accessibility plan at least once every five years.	Completed.
6(2)	Self-Serve Kiosks	6(2) Large organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Not applicable.	Not Applicable.
7(1)	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 all :</p> <p>a) employees, and volunteers;</p> <p>b) persons who participate in developing the organization's policies; and</p> <p>c) other persons who provide goods, services or facilities on behalf of the organization.</p>	We use eLearning - HR Downloads training platform to provide required training to all existing and new personnel in Ontario.	Completed and Ongoing.
7(5)	Training	7(5) Every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	Our training records are maintained in the eLearning platform	Completed and Ongoing.
PART II – Information and Communications Standards				

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>11(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process.</p>	<p>Feedback processes are addressed in our Accessible Customer Service Plan - Ontario, which is posted internally and on our external website. Feedback processes are also addressed in our Accessibility Standards Policy – Ontario and Accessibility: Customer Service Policy - Ontario, which are posted internally and available at all Ontario locations. Ensuring our feedback processes are accessible will be handled on a case-by-case basis</p>	Completed and Ongoing.
12(1) and (2)	Accessible Formats and 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>This is addressed in our Accessibility Standards Policy – Ontario, which has been posted internally and is available at all Ontario locations. Requests will be handled on a case-by-case basis.</p>	Completed and Ongoing.
12(3)	Accessible Formats and Communication Supports	<p>12(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>This is addressed in our Accessible Customer Service Plan – Ontario, which is posted internally and our external website. This is also addressed in our Accessibility Standards Policy – Ontario, which is posted internally and available at all Ontario locations.. A notification to this effect is also posted in our Toronto store.</p>	Completed and Ongoing.
13(1)	Emergency Procedures, Plans or Public Safety Info	<p>13(1) 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.</p>	<p>Not applicable.</p>	Not applicable.
14(2)	Accessible Websites and Web Content	<p>14(2) 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 prescribed schedule.</p>	<p>Our website has been updated as required to be compliant. WCAG guidelines will be continuously reviewed to be informed of changes and updates.</p>	Completed and Ongoing.
PART III – Employment Standards				
22	Recruitment –General	<p>22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p>	<p>This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. Job postings for vacant positions in Ontario will have a statement about the availability of accommodations and how to request accommodations.</p>	Completed and Ongoing.
23	Recruitment, Assessment or Selection Process	<p>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.</p>	<p>This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. Job postings for vacant positions in Ontario will have a statement about the availability</p>	Completed and Ongoing.

		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.	of accommodations and how to request accommodations. Any requests for accommodation will be handled on a case-by-case basis.	
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 incorporate an accessibility clause in the offer letters for new hires in Ontario.	Completed and Ongoing.
25(1) and (2)	Informing Employees of Supports	25(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including 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 new employees as soon as practicable after they begin their employment.	All new hires in Ontario will be required to complete online AODA training videos and are given copies of our Accessible Customer Service Policy - Ontario, Accessible Customer Service Plan - Ontario, and Accessibility Standards Policy – Ontario as part of orientation. These policies are also posted internally.	Completed and Ongoing.
25(3)	Informing Employees of Supports	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.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. Any updates to policies will generally be communicated via email.	Completed and Ongoing.
26(1) and (2)	Accessible Formats and Communication Supports for Employees	26(1) 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. 26(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. Requests will be handled on a case-by-case basis.	Completed and Ongoing.
27(1)	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.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. Emergency response information is discussed as part of a new hire's orientation, during a return to work from a disability leave and upon an employee notifying HR of a disability requiring assistance.	Completed and Ongoing.
27(2), (3) and (4)	Workplace Emergency Response Information	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. 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. 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	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. A list of persons requiring assistance will be provided to Management and Fire Wardens.	Completed and Ongoing.

		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. 28 (2) The process for the development of documented individual accommodation plans shall include the prescribed elements.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. We also have a separate documented Individual Accommodation Plan Process that includes the prescribed elements and which was developed in consultation with an external workplace health management services provider.	Completed.
29(1) and (2)	Return to Work Process	29(1) Every employer, other than an employer that is a small organization: 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 b) shall document the process. 29(2) The return to work process shall: 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 b) use individual documented accommodation plans, as described in section 28, as part of the process.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations. We also have a separate documented Return to Work Process, which was developed in consultation with an external workplace health management services provider.	Completed.
29(3)	Return to Work Process	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.	This is noted in our Accessibility Standards Policy - Ontario and our documented Return to Work Process.	Completed.
30(1)	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.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations . We also include a statement in our performance management process, sent via e-mail every year to employees, to explicitly reference this requirement.	Completed and Ongoing.
31(1)	Career Development and 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.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations.	Completed and Ongoing.
32(1)	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.	This is addressed in our Accessibility Standards Policy - Ontario, which is posted internally and available at all Ontario locations.	Completed and Ongoing.
Part IV.1 – Design of Public Spaces Standards				
80.41 (1)	Service Counters	80.41 (1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met: 1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters. 2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters. O. Reg. 413/12, s. 6.	Working in conjunction with our builders, our Ontario store and office has been built/redeveloped in compliance with this requirement.	Completed and Ongoing.

		(2) The service counter that accommodates mobility aids must meet the following requirements: 1. The countertop height must be such that it is usable by a person seated in a mobility aid. 2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required. 3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid.		
80.42	Fixed Queuing Guides	80.42 When constructing new fixed queuing guides, the following requirements must be met: 1. The fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices. 2. The fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction. 3. The fixed queuing guides must be cane detectable.	Has not yet been applicable	Not Yet Applicable.
80.43	Waiting Areas	80.43 (1) When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space. 80.43(2) For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait.	Working in conjunction with our builders, our Toronto store and office has been built/redeveloped in compliance with this requirement.	Completed and Ongoing.
80.44	Maintenance of Accessible Elements	80.44 Obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following: 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part. 2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.	Our support team has been tasked with routinely checking that accessible elements in our existing public spaces are in good working order and that any required repairs are completed as quickly as possible. Our Accessible Customer Service Plan – Ontario addresses what happens in the event of a temporary disruption.	Completed and Ongoing.
PART IV.2 – Customer Service Standards				
80.46(1)	Establishment of policies	80.46 (1) Every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.	Our Accessible Customer Service Plan – Ontario is complete and posted internally and on our external website. Our Accessibility: Customer Service Policy - Ontario is also complete and posted internally.	Completed.
80.48 (1)	Notice of temporary disruptions	80.48 (1) If, in order to obtain, use or benefit from a provider’s goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.	Our Accessible Customer Service Plan – Ontario and Accessibility: Customer Service Policy – Ontario outlines the steps we will take to provide notice of a temporary disruption, which may include posting a notice in store by the cash desk and leaving a message on the store phone system.	Completed and Ongoing.

80.49 (1)	Training for staff, etc.	80.49 (1) Every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities: a) all employees, and volunteers; b) all persons who participate in developing the provider's policies; and c) all other persons who provide goods, services or facilities on behalf of the provider.	We use eLearning platform - HR Downloads to provide required training to all existing and new personnel in Ontario. A summary of our customer service training is included in our Accessible Customer Service Plan – Ontario, which is posted internally and on our external website.	Completed and Ongoing.
80.49(5)	Training for staff, etc.	80.49(5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	Our training records are maintained in eLearning platform – HR Downloads.	Completed and Ongoing.
80.50 (1)	Feedback process	80.50 (1) Every provider shall establish a process for receiving and responding to, a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).	Feedback processes are addressed in our Accessible Customer Service Plan – Ontario, which has been posted internally and on our external website. We have also posted a Customer Service Feedback Form on our external website and have copies of the form available in our Toronto store. Our feedback processes are also addressed in our Accessibility: Customer Service Policy - Ontario, which is posted internally.	Completed and Ongoing.
80.51 (1)	Format of documents	80.51 (1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support, 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. (2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.	This is noted in our Accessible Customer Service Plan - Ontario, which is posted internally and on our external website. Requests will be handled on a case-by-case basis.	Completed and Ongoing.