

Falls Avenue Resort - Participating Businesses

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)

Multi-year plan for the Integrated Accessibility Standards

September, 2016

TITLE	AODA STANDARD	ACTION PLAN	STATUS	NOTES
PART 1 - GENERAL				
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>Policy Maintenance – Review policies bi-annually against regulatory/industry updates to ensure ongoing compliance</p> <p>In current policy</p> <p>Policy included in all websites – both customer and candidates for employment and included in new hire electronic documentation/pre-hire process</p>	<p>Ongoing obligation</p> <p>Completed 2012</p> <p>New Hire Electronic process commenced September, 2014</p>	<p>Next review to be completed by December 15, 2016</p>

<p>Accessibility Plans</p>	<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 the Regulation;</p> <p>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and to website</p> <p>(c) review and update the accessibility plan at least once every five years.</p>	<p>Develop multi-year plan</p> <p>HR to provide copies of plan in other accessible formats upon candidate request</p> <p>Review every 5 years</p>	<p>Completed Jan 1 2014</p> <p>Ongoing obligation</p> <p>Next review not later than December 1, 2019. Updated October 2015</p>	
<p>Training</p>	<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;</p>	<p>Requirements are included on internal company website (intranet) and Employee Handbook (last revised December 2012). Requirements also part of Resort’s pre-employment documentation and selection process (electronic version (September 2014).</p> <p>Review sufficiency of information at</p>	<p>Completed 2012</p> <p>Ongoing obligation</p>	<p>Current updated Handbook pending Falls 2016</p>

	<p>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>each time Employee Handbook is updated</p> <p>No person other than employees provide services or facilities</p> <p>Department specific training was developed and conducted and form part of each Departments Standard Operating Procedures. New employees receive training as part of their Department Specific Primary Training. Current Training material in 2015 Employee Handbook released June 2015</p> <p>Staff not previously hired in 2012 were trained in Accessibility for</p>	<p>Various businesses have their own unique AODA policies, eg. Fallsview Indoor Waterpark and Adventure City- given significant differences of amusement rides and safety requirements</p> <p>Complete</p>	
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	<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, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Ontarians with Disabilities in the Fall of 2012. Staff hired <u>after 2012</u> had material incorporated into the Resort's new hire/orientation process. All Staff received June 2015 Employee Handbook outlining training documents</p> <p>Training will be conducted as required for changes on an ongoing basis. Employee handbook, Management and JHSC/AODA subcommittees, HR staff updated and consulted on changes to policies and processes</p> <p>Records will be retained in accordance with AODA requirements or Ontario's Employment Standards Act, whichever is greater</p>	<p>Train /communicate future changes if any</p>	
PART II - INFORMATION AND COMMUNICATIONS STANDARDS				
Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure	Current Feedback process was previously developed and forms part of the Resort's Policy. Changes to the	Ongoing Review	Next review: by December 15, 2016. Process

	<p>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>current Feedback process will be reviewed with Chief Operating Officer in consultation with Operational General Managers</p> <p>Noted in policy which is included in website</p>		currently being reviewed/evaluated
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,</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>All requests will be documented and access format determined. A process to meet this requirement will be developed.</p> <p>In person an telephone access available to expedite timeliness of receiving and responding to person's needs/concerns</p> <p>Resort commits that any charge for such accessible formats or supports shall not be more than the regular cost charged to other persons in</p>	<p>Ongoing Obligation-Data collection and retrieval site created in 2015: aoda@niagarfallshotels.com which is centrally managed by Human Resources</p>	team.

	<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>Ontario</p> <p>The format will be determined in consultation with the individual making the request</p> <p>The commitment to provide available formats are incorporated in the Policy available to the public, and communicated upon request</p>	<p>Ad hoc requests</p> <p>Completed 2012</p>	
<p>Emergency procedure, plans or public safety information</p>	<p>13. (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</p>	<p>Falls Avenue Resort and its participating businesses 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 & Crisis</p>	<p>Completed 2012</p> <p>Completed 2012</p>	

	<p>information available to the public shall meet the requirements of this section by January 1, 2012.</p>	<p>Management Program centrally controlled at the Resort through guest property management systems, central reservations and switchboard , operating business and centralized security protocols. Detailed training plans are included in Employee Handbook for employee referral and usage</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> <p>1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0</p>	<p>Will meet requirements within the specified timeframe</p>	<p>Complete</p> <p>Ongoing obligation</p> <p>2 new websites created in 2014</p> <p>HR recruiting site: fallsavenuecareers.ca</p> <p>and New Hire documentation/pre-selection websites created</p>	<p>For new websites</p> <p>January 1, 2021 for all internet websites</p> <p>Complete</p>

	<p>Level A.</p> <p>2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). 		<p>in 2014 and both are WCAG 2.0 Level A compliant. Requirements formed part of RFP for creation of website by outside vendor</p> <p>Marketing to create action plan for conversion of existing websites and enhancement of current WCAG 2.0 Level A to Level AA by timeframes required by regulation</p>	<p>By Jan 1, 2021</p>
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PART III – EMPLOYMENT STANDARDS

<p>Recruitment, general</p>	<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>Included on Resort’s recruiting website, which includes all jobs-both currently available and those that might be available in the future. Information posted in our Diversity Recruitment section</p>	<p>Complete</p>	
<p>Recruitment, assessment or selection process</p>	<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>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.</p>	<p>Candidates publicly notified on Resort’s job posting and application website- fallsavenuecareers.ca. In 2 sections- Diversity Recruiting and Accessibility tabs which include Resort’s Accessible Employment Policy as Well as Customer Policy, and this Multi-Year Plan</p> <p>Candidate may request in advance by following directions under Diversity Recruitment tab or prior to interviews – with interviewing resort management Interviews offer accommodation supports to candidates being interviewed and will provide such accommodation support upon request. Mgrs to advise candidates prior to interview or other assessments being conducted</p>	<p>Ongoing obligation</p> <p>Ongoing obligation. Process modified October 2015 with respect to negotiated changes to Workers United collective agreement.</p> <p>Additional training of worker reps to assist in worker/AODA accommodation issues scheduled for Winter</p>	<p>Current process under review. Review sufficiency of current process by January 1, 2017</p>

		<p>Accommodation supports to be mutually agreed upon wherever possible and practical. Commitment noted on fallsavenuecareers.ca- Diversity Recruitment Section. Consultation includes trade union representation where applicable.</p>	2016/2017	
Notice to successful applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>Candidates considering offers, complete a pre-selection process whereby they are made aware of our AODA and Human Rights policies, including our policy on accommodating employees with disabilities.</p>	Complete Sept 2014	
Informing employees of supports	<p>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</p>	<p>Noted in Employee Handbook. Human Resources and Purchasing work in co-operation with individual departments to address the issue and potential solutions, working with the disabled employee, with respect to temporary or permanent</p>	Complete	Ongoing

	<p>accessibility needs due to disability.</p> <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>	<p>modifications of job task or equipment, wherever reasonable and practical.</p> <p>New Hires receive this information prior to commencing employment through the Resort's electronic candidate pre-hire assessment and documentation process, which includes the Resort sharing all pertinent policies of the Resort, including AODA, Human Rights and the Resort's duty to accommodate</p> <p>Any change in existing employment policies, including job accommodation efforts that take into account an employee's accessibility needs due to disability will be posted to the Recruiting site and updated in a revised Employee Handbook which is provided to all current employees. 2015 Employee handbook released electronically and paper-based to all employees during Summer of 2015</p>	<p>Complete</p> <p>Ongoing obligation. Updates are noted in this multi-year plan/ AODA policy and posted on Recruiting and business websites</p>	<p>Ongoing</p>

<p>Accessible formats and communication supports for employees</p>	<p>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,</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>	<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</p> <p>Consultation includes trade union staff representatives, where applicable and designated AODA worker members to the Joint Health and Safety Committee</p>	<p>Ongoing Obligation</p>	
<p>Workplace emergency response information</p>	<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>Individualized workplace emergency response information procedures have been developed for employees with disabilities. Resort’s modified duty program reviews and works with employees who experience a disability during the course of their employment for workplace emergency response monitoring and</p>	<p>Complete 2012 and ongoing</p>	

	<p>(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.</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>action</p> <p>Workplace Emergency Response Lists/ Information forms have been prepared for employees who have either disclosed a disability or whom the Resort is aware has a disability that could negatively impact them in a case of emergency.</p> <p>Emergency plans are principally generated and controlled at the department level.</p> <p>On an ongoing and regular basis, Falls Avenue Resort will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed</p>		
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	(5) Every employer shall meet the requirements of this section by January 1, 2012.			
Documented individual accommodation plans	<p>28. (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"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can 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. 4. The manner in which the employee 	Standardized accommodation template to be created on Resort's internal intranet which is accessible by all Managers. Revisions to format currently under review. Employee Handbook to be updated to communicate the process which will include all elements mentioned below under 28(2)	Completed	

	<p>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</p>	<p>Union and Employer negotiated an amending document to the current collective agreement – a letter of understanding outlining the commitments , process, and how the union participates in the process with respect to all issues under this Section</p>	<p>Completed November 2015</p>	
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<p>Return to work process</p>	<p>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>29. (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</p>	<p>Longstanding process already in place. Co-ordinated by department managers and centralized Human Resources</p> <p>Individual RTW/accommodation documentation process updated November 2015</p>	<p>Completed Dec 15 , 2015</p>	
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	referenced in this section does not replace or override any other return to work process created by or under any other statute.			
Performance	30. (1) An employer that uses performance management in respect of	Falls Avenue Resort will take into account the accessibility needs of	Completed Dec 15, 2015	

<p>management</p>	<p>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>	<p>employees with disabilities, as applicable when conducting performance management reviews.</p>		
<p>Career development and advancement</p>	<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>(2) In this section,</p> <p>“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</p>	<p>Falls Avenue Resort will take into account the accessibility needs of disabled employees and individual accommodation plans when providing career development and advancement opportunities in order to permit employees to demonstrate their full capabilities and resulting achievements</p>	<p>Completed December 15, 2015</p>	

	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.			
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>	Falls Avenue Resort will take into account the accessibility needs of disabled employees and individual accommodation plans when redeploying disabled employees in an effort to minimize effects of displacement on employees wherever practical and so long as such redeployment does not otherwise result in the displacement of an existing employee.	Completed December 15, 2015	
DESIGN OF PUBLIC SPACES				
New buildings and major renovations	Should the company build new or make major changes to existing elements of	Falls Avenue Resort will continue to comply with the requirements of the Amendments to Ontario’s Building	Future projects or amendments to Ontario’s	Ongoing

	public spaces.	Code Falls Avenue Resort Construction/Renovation team and contracted Architects responsible for compliance of this provision	Building Code	
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