

## AODA MULTI-YEAR ACCESSIBILITY PLAN

In accordance with our organizational obligations under the AODA, Integrated Accessibility Standards Regulation (O. Reg. 191/11, s. 4 (1) (2)), Govan Brown has prepared this multi-year plan which contains the deliverables and activities that will be worked on over the next 3 to 5 years. Govan Brown recognizes that the AODA obligations are far-reaching, with varying levels of responsibility across the organization, which is why we have taken a strategic approach to implementation.

Accessibility Requirement	Description	Deliverables	Compliance Date
<u>Customer Service Standards</u>			
<b>Establishment of accessibility Policies</b>	<ul style="list-style-type: none"> <li>• Establish policies, practices and procedures on providing goods or services to persons with disabilities according to principles set out in regulation.</li> <li>• Create document describing policies, procedures and practices; provide upon request in alternative format.</li> <li>• Communicate with a person with a disability in a manner that takes into account their disability.</li> </ul>	<ul style="list-style-type: none"> <li>• Establish Customer Service Policy</li> <li>• Ensure document developed is accessible.</li> </ul>	<u>Jan 1, 2012</u>
<b>Use of Service Animals and Support Persons</b>	<ul style="list-style-type: none"> <li>• Establish policies, practices and procedures around a person with a disability being accompanied by a service animal or support person.</li> <li>• Create document describing policies, practices and procedures; provide upon request.</li> </ul>	<ul style="list-style-type: none"> <li>• Include a commitment statement in CSS policy</li> </ul>	<u>Jan 1, 2012</u>
<b>Notice of Temporary Disruptions</b>	<ul style="list-style-type: none"> <li>• Provide public notice of disruption in facilities or services by posting on premises or on website.</li> <li>• Include in notice reason for disruption, anticipated duration, and description of alternatives, if available.</li> <li>• Create a document describing steps to be taken for temporary disruptions; provide upon request.</li> </ul>	<ul style="list-style-type: none"> <li>• Post notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption;</li> <li>• Contact clients/guests with appointments; verbally notify clients/guests when they are making an appointment; or by any other method that may be reasonable under the circumstances.</li> </ul>	<u>Jan 1, 2012</u>
<b>Training for Staff</b>	Provide training to: <ul style="list-style-type: none"> <li>• Employees who deal with the public or others on behalf of Govan Brown</li> <li>• Everyone who participates in developing the organization's policies, practices and procedures governing providing goods or services to public or others.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop CSS training policy.</li> <li>• Develop CSS training</li> <li>• Develop process to provide training on an on-going basis.</li> <li>• Develop process to keep records of training, dates and numbers trained.</li> </ul>	<u>Jan 1, 2012</u>

	<ul style="list-style-type: none"> <li>• Include training on specific topics set out in the regulation.</li> <li>• Provide training on ongoing basis to reflect any changes to policies, practices and procedures.</li> <li>• Create document describing training policy, summary of content and details of when provided.</li> <li>• Keep records of training provided, including dates and number trained</li> </ul>		
<b>Feedback Process</b>	<ul style="list-style-type: none"> <li>• Establish process for receiving and responding to feedback; make information about process publicly available.</li> <li>• Create document describing process; make available on request.</li> </ul>	<ul style="list-style-type: none"> <li>• Establish process.</li> </ul>	<u>Jan 1, 2012</u>
<b>Notice of Availability and Format of Documents</b>	<ul style="list-style-type: none"> <li>• Notify customers that the documents covered by this regulation are available upon request by posting conspicuously on premises, website or other reasonable method.</li> </ul>	<ul style="list-style-type: none"> <li>• Include required notice at end of CSS policy and all documents</li> </ul>	<u>Jan 1, 2012</u>
<b>Emergency and Public Safety Information</b>	<ul style="list-style-type: none"> <li>• Make information available to public in an accessible format or with appropriate communication supports, upon request.</li> </ul>	<ul style="list-style-type: none"> <li>• Update and ensure Emergency Procedures Manual is in an accessible format.</li> </ul>	<u>Jan 1, 2012</u>
<b>Workplace Emergency Response Information</b>	<ul style="list-style-type: none"> <li>• Provide individualized workplace emergency response information to employees who have a disability if disability is such that it is necessary</li> </ul>	<ul style="list-style-type: none"> <li>• Develop a process for the company.</li> </ul>	<u>Jan 1, 2012</u>
<b><u>General Requirements</u></b>			
<b>Accessibility Policies</b>	<ul style="list-style-type: none"> <li>• Develop, implement and maintain policies about what Govan Brown will do to meet the IASR requirements and become more accessible</li> </ul>	<ul style="list-style-type: none"> <li>• Prepare a policy.</li> </ul>	<u>Jan 1, 2014</u>
<b>Accessibility Plans</b>	<ul style="list-style-type: none"> <li>• Create multi-year plan (5 years) outlining strategic direction to prevent and remove barriers, post plan and make accessible.</li> </ul> <p>Govan Brown will:</p> <ol style="list-style-type: none"> <li>a) Develop, implement and maintain a multi-year plan which outlines a strategy to prevent and remove barriers, and meet the current and future requirements of the AODA (Accessibility for Ontarians with Disabilities Act)</li> <li>b) Assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities</li> <li>c) Post the plan on our website, and provide all</li> </ol>	<p><b>Multi-year plan</b></p> <ul style="list-style-type: none"> <li>• Prepare 5-year plan.</li> </ul>	<u>Jan 1, 2014</u>

	information relating to the plan in alternative formats, upon request d) Review and update the accessibility plan at least once every 5 years		
<b>The Provision of Goods and Services to Persons with Disabilities</b>	<ul style="list-style-type: none"> <li>• Ensure that all clients/guests receive the same value and quality;</li> <li>• Allow clients/guests with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present a safety risk;</li> <li>• Use alternative methods when possible to ensure that clients/guests with disabilities have access to the same services, in the same place and in a similar manner;</li> <li>• Take into account individual needs when providing goods and services; and</li> <li>• Communicate in a manner that takes into account the client/guest's disability.</li> </ul>	<ul style="list-style-type: none"> <li>• Develop accessibility-related resources and information.</li> </ul>	<b><u>Jan 1, 2014</u></b>
<b>Self-Serve Kiosks</b>	<ul style="list-style-type: none"> <li>• Govan Brown will have consideration for accessibility when designing, procuring or acquiring self-service kiosks to better serve persons with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>• Self-service kiosks are not currently offered at Govan Brown.</li> </ul>	<b><u>Jan 1, 2015</u></b>
<b><u>General Requirements</u></b>			
<b>Training</b>	<ul style="list-style-type: none"> <li>• Train all employees, volunteers, persons developing policies, and all others providing goods, services or facilities on behalf of Govan Brown on requirements of IASR standards and on OHRC as it pertains to disabilities.</li> <li>• Ensure training on standards and OHRC is appropriate to duties of employees, volunteers and others.</li> <li>• Provide ongoing training in respect to any changes.</li> <li>• Keep record of training, dates trained, number trained.</li> </ul>	<ul style="list-style-type: none"> <li>• Source and or develop training to meet requirement.</li> </ul>	<b><u>Jan 1, 2015</u></b>
<b><u>Information and Communication Standards</u></b>			
<b>Feedback Process</b>	<ul style="list-style-type: none"> <li>• Govan Brown will ensure that existing feedback processes continue to remain accessible to people with disabilities by providing or arranging for the provision of accessible formats and</li> <li>• Ensure feedback processes are accessible by providing</li> </ul>	<ul style="list-style-type: none"> <li>• Feedback process has been established under the customer service standards.</li> </ul>	<b><u>Jan 1, 2015</u></b>

	<p>accessible formats or arranging for communication supports, upon request.</p> <ul style="list-style-type: none"> <li>The Public will be notified of availability of accessible formats and communication supports.</li> </ul>		
<b>Accessible Formats and Communication Support</b>	<ul style="list-style-type: none"> <li>Upon request, provide or arrange to provide accessible formats and communication supports for persons with disabilities:</li> <li>In a timely manner that takes into account the person's accessibility needs;</li> <li>At a cost that is no more than the regular cost charged to other persons.</li> </ul>	<ul style="list-style-type: none"> <li>We will consult with the person making the request to determine the suitability of an accessible format or communication support</li> </ul>	<u><b>Jan 1, 2016</b></u>
<b>Emergency Procedures, Plans, or Public Safety Information</b>	<ul style="list-style-type: none"> <li>Govan Brown, in cooperation with the Joint Health &amp; Safety committee, will assess our current emergency procedures for barriers to persons with disabilities during an emergency.</li> <li>We will update our procedures to ensure that all staff remember to take into consideration the various disabilities, and ensure their needs can be met in the event of an emergency. We will also provide employees with disabilities with individualized emergency response information, when necessary.</li> </ul>	<ul style="list-style-type: none"> <li>Govan Brown will provide Clients and Guests with publicly available emergency information in an accessible format, upon request.</li> </ul>	<u><b>Jan 1, 2012</b></u>
<b>New Internet Websites and web Content</b>	<ul style="list-style-type: none"> <li>Conform to WCAG 2.0, initially Level A. (Applies to websites, web content and web-based applications that we control directly or through contractual relationship)</li> </ul>	<ul style="list-style-type: none"> <li>Content to ensure it is accessible (level A compliant).</li> </ul>	<u><b>Jan 1, 2014</b></u>
<b><u>Employment Standards</u></b>			
<b>Recruitment</b>	<ul style="list-style-type: none"> <li>During the recruitment process, Govan Brown will notify applicants about the availability of accommodation. We will also do the following: <ul style="list-style-type: none"> <li>(a) Notify job applicants selected in hiring process that accommodations are available upon request in relation to material or processes to be used.</li> <li>(b) Consult with the applicant, or arrange to provide the accommodation.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Prepare communication to notify potential applications about accommodation process.</li> <li>Consult with potential applications when a request is made.</li> <li>Accommodate applicants during the hiring process, upon request.</li> </ul>	<u><b>Jan 1, 2016</b></u>
<b>Documented Individual Accommodation Plans</b>	<p>Govan Brown will develop and implement a written process for the development of individual accommodation plans for employees with disabilities.</p> <p>The process for the development of documented individual</p>	<ul style="list-style-type: none"> <li>Develop a written process for individualized accommodation plans (IAP).</li> </ul>	<u><b>Jan 1, 2016</b></u>

	<p>accommodation plans must include the following elements:</p> <ul style="list-style-type: none"> <li>• The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan</li> <li>• The means by which the employee is assessed on an individual basis</li> <li>• 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>• The steps taken to protect the privacy of the employee's personal information</li> <li>• The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done</li> <li>• If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee</li> <li>• The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability</li> </ul>		
<b>Employees Returning to Work</b>	<ul style="list-style-type: none"> <li>• Establish a documented return-to-work process.</li> <li>• Process to facilitate RTW and document IAP.</li> </ul>	<ul style="list-style-type: none"> <li>• Prepare a documented return-to-work process in place.</li> <li>• Incorporate IAP in RTW process.</li> </ul>	<b><u>Jan 1, 2016</u></b>
<b>Performance Management, Career Development and Redeployment</b>	<ul style="list-style-type: none"> <li>• Govan Brown will take into account disability and accommodation plan when using performance management, when redeploying employees.</li> </ul>	<ul style="list-style-type: none"> <li>• Prepare document outlining process to ensure IAP is involved during performance management and redeployment.</li> </ul>	<b><u>Jan 1, 2016</u></b>
<b><u>Information and Communications Standards</u></b>			
<b>Accessible Formats and Communication Supports</b>	<p>Govan Brown will arrange for accessible formats and communication supports (upon request, in a timely manner, at cost that is no more than regular charge to others).</p>	<ul style="list-style-type: none"> <li>• Prepare a process to facilitate this obligation.</li> </ul>	<b><u>Jan 1, 2016</u></b>
<b>ALL Internet Websites and Web Content (2021)</b>	<ul style="list-style-type: none"> <li>• Must comply with WCAG 2.0 Level AA (excludes live captioning, audio description).</li> </ul>	<ul style="list-style-type: none"> <li>• All websites and web content to confirm to Level AA.</li> </ul>	<b><u>Jan 1, 2021</u></b>