

Multi-Year Accessibility Plan



The following is the multi-year plan that is in effect for our operating companies, namely, North American Development Group and Related Companies. A copy of the plan may be requested by contacting hr@nada.com or 905-477-9200.

PART I – GENERAL REQUIREMENTS

Section # from Act	Initiative	Requirement outlined in the Act	Actions	Gap (Y/N)	Status	Accountability	Deadline
Reg 19/11 - 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.	Both our Customer Service Policy and IASR Policy comprise our accessibility policies. The statement of commitment is included in both.	N	Complete	Human Resources	January 1, 2014
Reg 19/11 - 4	Accessibility Plans	4.(1) Large organizations shall, 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; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years.	An accessibility plan is being refined by determining barriers that exist at the Company. Plan and policy to be posted on internal and external website. The plan will be available in accessible format, upon request. HR reviewed the plan and policy in August 2016 and has committed to reviewing the plan minimally once every 5 years, the next review will occur on in January 2020.	N	Ongoing compliance	Human Resources	January 1, 2014
Reg 19/11 - 6	Self Service Kiosks	Obligated organizations shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks.	Although the company currently does not use self-service kiosks, it will have regard to the accessibility for persons with disabilities should it design, procure or acquire self-service kiosks by considering what accessibility features could be built into kiosks to best meet the needs of our customers and clients.	N	Currently not applicable	Marketing Department	January 1, 2014
Reg 19/11 - 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.	All existing Co-Worker will complete training in December 2016 and new Co-Workers are required to complete training within 30 days of their start date. Train Co-Workers in general requirements, information and communication standard as appropriate and update accessible customer	N	Ongoing Compliance	Human Resources	January 1, 2015

			<p>service training and Ontario Human Right Code online training.</p> <p>Training for Section 80.49 (CSS) is ongoing for new hires and received by current Co-Workers. Confirm that partner staff, i.e. security etc. are trained by partner.</p>	N	Ongoing Compliance		January 1, 2012
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PART II – INFORMATION AND COMMUNICATIONS STANDARDS

Section # from Act	Initiative	Requirement outlined in the Act	Actions	Gap (Y/N)	Status	Accountability	Deadline
Reg 19/11 - 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.	Under the Customer Service Policy, a feedback process was established for receiving and responding to feedback specifically about the manner in which the Company provides accessible goods or services to people with disabilities. If feedback is elicited from Co-Workers, a variety of methods will be available and Co-Workers are notified that if they require an accessible format to notify their management or HR.	N	Ongoing Compliance	Human Resources	January 1, 2015
Reg 19/11 - 12	Accessible Formats & Communication Supports	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, <ul style="list-style-type: none"> 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. 12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	In some cases, the Company will be able to provide the information or communications supports quickly. In other cases, we will require more time due to the complexity of the document / drawing and resources or internal capacity of the organization. The organization will make every effort to ensure customers/clients receive accessible document or communication supports within 10 business days.	N	Complete	Marketing Department	January 1, 2016
		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	The Company currently uses marketing materials in many different formats. Some of these formats are not available in an accessible format at this time. Schematics, CAD drawings, models, and blueprints are not available in accessible	Y	In Progress	Marketing Department	January 1, 2016

			<p>format at this time. Any questions can be directed to Marketing Department at marketing@nadg.com at 905 477 9200.</p> <p>The Company will upon request provide or arrange for the provision of accessible formats or communication supports for person with disabilities. The availability of accessible formats and communication supports is communicated</p>				
Reg 19/11 - 13	Emergency Procedures, Plans or Public Safety Information	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.	Any emergency procedures/plan or public safety information the Company makes publicly available will be provided in an accessible format upon request. The format is dependent upon the request of the individual. The following Accessibility statement is posted in the head office lobby, "During your visit to our facility, if you require accommodation in the event of an emergency evacuation please notify the receptionist or the person you are meeting with.	N	Complete	Marketing Department	January 1, 2012
Reg 19/11 - 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.	Any new public websites and web content will comply with WCAG 2.0 Level A. NADG does foresee a significant redesign (more than 50% of content design or technology of its website or a new URL) and will plan to comply with this requirement.	N	Not applicable	Marketing Department	January 1, 2014
			The Company website content is maintained locally. Closer to the deadline NADG website content will be reviewed and the information for working with web developers. If the requirement is applicable to the NADG website in 2021, compliance plan will be scheduled.	N	To be scheduled for future requirement		January 1, 2021

PART III – EMPLOYMENT STANDARD

Section # from Act	Initiative	Requirement outlined in the Act	Actions	Gap (Y/N)	Status	Accountability	Deadline
Reg 19/11 - 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.	The Company will notify its Co-Workers and the public about the availability of accommodation for applicants with disabilities in its recruitment process.	N	Ongoing Compliance	Human Resources	January 1, 2016
Reg 19/11 - 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.	The Company will notify the public through job postings of our acceptance of all qualified candidates, and further, requests for accommodation through the recruitment process are welcome. It will notify our job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.	N	Ongoing Compliance	Human Resources	January 1, 2016
Reg 19/11 - 24	Notice to Successful Applicants	24. Every employer shall, when making employment offers, notify successful applicants of its policies for accommodating employees with disabilities.	When making offers of employment, the Company will notify the successful applicant of its policies for accommodating Co-Workers with disabilities.	N	Ongoing Compliance	Human Resources	January 1, 2016
Reg 19/11 – 25	Informing Co-Workers 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. 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after their start date. 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.	The Company will continue to inform its Co-Workers of its policies (and any updates to those policies) used to support Co-Workers with disabilities, including policies on the provision of job accommodations that take into account a Co-Worker’s accessibility needs due to disability. This information will be provided to new Co-Workers as soon as practicable after commencing employment.	N	Ongoing Compliance	Human Resources	January 1, 2016
Reg 19/11 - 26	Accessible Formats & Communication	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;	Upon the request of a Co-Worker with a disability, The Company will consult with the Co-Worker to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to	N	Ongoing Compliance	Human Resources	January 1, 2016

	Supports for Co-Workers	(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.	perform his/her job, and information that is generally available to other Co-Workers. In determining the suitability of an accessible format or communication support, The Company will consult with the Co-Worker making the request.				
Reg 19/11 - 27	Workplace Emergency Response Information	27.(1) Every employer shall provide individualized workplace emergency response information to employee 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.	HR and the Co-Worker's Manager will work with the Co-Worker that requires assistance and create a plan based on the type of accommodation required during a workplace emergency. Co-Workers are required to complete the <i>Individual Accommodation / Workplace Emergency Response Form</i>	N	Ongoing Compliance	Human Resources	January 1, 2012
		(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 employees	Co-Worker's manager and HR team may have access to this information at any given time for the purpose of assisting the Co-Worker. Co-Workers are advised of this in the consent section of the <i>Individual Accommodation / Workplace Emergency Form</i> .	N	Ongoing Compliance	Human Resources	January 1, 2012
		(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.	The Company has committed to providing this information to the Co-Worker as soon as possible.	N	Ongoing Compliance	Human Resources	January 1, 2012
		(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 (c) when the employer reviews its emergency response policies.	The Company has committed to review the individualized workplace emergency response information as outlined in this section.	N	Ongoing Compliance	Human Resources	January 1, 2012
Reg 19/11 - 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 detailed elements.	<i>An Individual Accommodation / Workplace Emergency Form</i> and process has been established for Co-Workers with disabilities. The process requires detailed planning information regarding the limitations and the accommodation required. The process for the development of documented individual	N	Complete	Human Resources	January 1, 2016

			accommodation plans includes the criteria as outlined in this section.				
Reg 19/11 - 29	Return to Work Process	<p>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.</p> <p>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.</p> <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>	<p>A return to work process exists through the company's Long Term Disability Plans and will be documented and referenced in return to work Co-Worker situation.</p> <p>The return to work process includes the criteria outlined in this section.</p>	N	Complete	Human Resources	January 1, 2016
Reg 19/11 - 30	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 PM process in respect of employees with disabilities.	The Company has a formal performance management review process that takes into into account the accessibility needs of employees with disabilities and provides accommodation where needed.	N	Ongoing Compliance	Human Resources	January 1, 2016
Reg 19/11 - 31	Career Development & 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.	Any programs related to career development and advancement at the Company will take into account the accessibility needs of the Co-Worker with the disability as well as any individual accommodation plans.	N	Ongoing Compliance	Human Resources	January 1, 2016
Reg 19/11 - 32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, and individual accommodation plans when redeploying employees	If a Co-Worker with disability is laid off, an <i>Employment Ontario</i> service provider is provided as a resource to the Co-Worker	N	Ongoing Compliance	Human Resources	January 1, 2016