

# **DANIELS INTEGRATED ACCESSIBILITY STANDARDS POLICY**

**THE DANIELS CORPORATION - DECEMBER 2017**

**20 Queen St West, Suite 3400, Toronto, ON.**

## **DANIELS INTEGRATED ACCESSIBILITY STANDARDS POLICY**

### **1. PURPOSE AND STATEMENT OF COMMITMENT**

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying and, to the extent possible, preventing and eliminating barriers experienced by a person with a disability.

The Integrated Accessibility Standards (“IAS”) has been established under the Act to ensure accessibility for every person with a disability in the areas of (i) information and communication, (ii) employment, (iii) transportation, (iv) design of public space and (v) customer service.

Daniels (the “Company”) strives to provide an accessible environment for its employees and members of the public. The Company is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with a disability in a timely manner.

The objective of this policy (the “Policy”) is to identify and document how the Company seeks to achieve compliance with the requirements of the IAS and how it will continue to work toward improving accessibility for persons with a disability.

Nothing in this Policy is intended to replace or negate existing laws related to accessibility for persons with disabilities including but not limited to the *Human Rights Code* and the *Workplace Safety and Insurance Act, 1997*.

### **2. APPLICATION OF THE POLICY**

The Policy applies to:

- (a) Every person who is an employee of, or a volunteer with, Daniels.
- (b) Every person who participates in developing Daniels’ policies.
- (c) Every other person who provides goods, services or facilities on behalf of Daniels.

### **3. DEFINITIONS**

***Accessible Format*** - May include, but is not limited to, large print, recorded audio and electronic format, braille and any other format usable by a person with a disability.

***Communication Support*** - May include, but is not limited to, captioning, alternative and an augmentative communication support, plain language, sign language and any other support that facilitates effective communication.

**Disability** – means:

- (a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device.
- (b) A condition of mental impairment or a developmental disability.
- (c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- (d) A mental disorder.
- (e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

**New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

**Performance Management** - means an activity related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

**Redeployment** - means the reassignment of an employee to other department or job as an alternative to layoff, when a particular job or department has been eliminated.

**Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.

**Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making a website and web content accessible to people with a wide-range of disabilities. The IAS requires an organization to become compliant with two levels of the WCAG - Level A and Level AA.

#### 4. GENERAL ACCESSIBILITY STANDARDS

(a) **Communication**

The Company strives to communicate with a person with a disability in a manner that takes into account the individual’s disability.

(b) **Accessibility Plan**

Daniels has established and implemented an Accessibility Plan to outline the Company's strategy to prevent and remove barriers for a person with a disability and meet the requirements of the IAS.

Daniels will maintain the Accessibility Plan in accordance with the requirements of the IAS and will review and update it at least once every five (5) years.

The Accessibility Plan is posted on Daniels' website and will be made available in an Accessible Format, upon request.

(c) **Training**

The Company will provide initial training, and ongoing training as required under the IAS, to all persons to whom this Policy applies.

Training will be provided on:

- (i) The requirements of the IAS and the Policy.
- (ii) Daniels' obligations under the *Human Rights Code* as they relate to a person with a disability.

The Company will ensure training is provided to all persons to whom this Policy applies as soon as practicable after the person is hired or otherwise retained. On-going training will also occur as changes are made to the Policy.

The Company will maintain records of the individuals to whom training is provided and when the training occurred.

## 5. **INFORMATION AND COMMUNICATION STANDARDS**

(a) **Feedback Procedure**

Daniels will ensure its process for receiving and responding to feedback is accessible to a person with a disability by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

Daniels will notify the public of the availability of Accessible Formats and Communication Supports for feedback purposes.

(b) **Accessible Formats and Communication Supports**

Upon request, Daniels will provide or arrange for the provision of Accessible Formats and Communication Supports to make its communication or information about its goods, services and/or facilities accessible to a person with a disability. Accessible Formats and

Communication Supports will be provided in a timely manner and at a cost no more than the regular cost charged to any other person.

Daniels will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support. Daniels will also notify the public of the availability of Accessible Formats and Communication Supports.

(c) **Emergency Plans, Procedures and Public Safety Information**

Daniels will provide any emergency plans, procedures or public safety information that it makes available to the public in an Accessible Format or with appropriate Communication Supports upon request and as soon as practicable.

(d) **Accessible Websites and Web Content**

Daniels will ensure, where practicable, any New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By January 1, 2021 Daniels will ensure, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section are practicable Daniels will consider the availability of commercial software or tools required to achieve web accessibility; and the impact meeting the requirements of this section will have on any project planned before January 1, 2012.

The commitment to provide an accessible website and web content only applies to a website and web content Daniels controls directly or indirectly through a contractual relationship allowing for modification of the website or web content at issue.

## **6. EMPLOYMENT STANDARDS**

The Employment Standards only apply to employees of Daniels. They do not apply to volunteers or other unpaid individuals or contractors.

(a) **Recruitment, Selection and Assessment**

Daniels will notify the public and employees of the availability of accommodation during the recruitment process.

Daniels will notify job applicants that accommodation is available upon request if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, Daniels will 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.

(b) **Notice to Successful Applicants**

When making an offer of employment Daniels will notify the successful applicant of Daniels' policy on accommodating employees with a disability.

(c) **Informing Employees of Supports**

Daniels will inform its employees of its policies on supporting an employee with a disability, including, but not limited to, its policy on the provision of job accommodation that takes into account an employee's accessibility needs due to disability. This information will be provided to a new employee as soon as practicable after commencing employment.

Daniels will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodation for an employee with a disability.

(d) **Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, Daniels will provide or arrange for the provision of Accessible Formats and Communication Supports to ensure information required by the employee to perform his or her job and/or information generally available to an employee in the workplace is accessible to the employee with a disability.

Daniels will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, Daniels reserves the right to determine the Accessible Format or Communication Support provided.

(e) **Workplace Emergency Response Information**

Daniels will provide individualized emergency response information to any employee who requires it as a result of a disability. This information will be provided as soon as practicable after Daniels becomes aware of the employee's need for an individualized response.

Where the employee will require assistance in an emergency, and with the employee's consent, Daniels will designate a colleague(s) to provide such individualized assistance and will provide the colleague(s) with the employee's individualized emergency response information.

Daniels will review the individualized workplace emergency response information when (i) the employee moves to a different work location, (ii) the employee's overall accommodation needs or plans are reviewed, and/or (iii) Daniels reviews its general emergency response policies.

(f) **Individual Accommodation and Return to Work**

Daniels has a written process for developing a documented individual accommodation plan for an employee with a disability. The process includes all elements required by the IAS.

Any individual accommodation plan prepared for an employee will include:

- (i) Information on Accessible Formats or Communication Supports provided to the employee.
- (ii) Any individualized workplace emergency response plan developed for the employee.
- (iii) Any other forms of accommodation being provided to the employee as a result of his or her disability.

Daniels also has a written process for any employee who may be returning to work following a disability-related leave of absence. The process includes the steps taken to facilitate the employee's return to work and the development of any required individual accommodation plan on return.

For more information, please consult Daniels' Individual Accommodation and Return to Work Policy.

(g) **Performance Management, Career Development and Advancement and Redeployment**

Daniels will take an employee's accessibility needs, and any individualized accommodation plan, into account in:

- (i) Conducting performance management.
- (ii) Providing opportunities for career development and advancement.
- (iii) Making redeployment decisions.

7. **THE BUILT ENVIRONMENT**

(a) **Public Spaces**

Daniels will ensure any newly constructed or redeveloped public spaces meet the accessibility requirements of the Design of Public Spaces Standards.

(b) **Maintenance**

Daniels' Property Managers (PM) are responsible for being aware of all the accessible elements at the properties they manage, to make the boards or property owners aware of any preventative or scheduled maintenance, and upon approval of the board or owner, engage in such maintenance. The PM shall create an appropriate response to manage emergency repairs for accessible elements to be presented to the board or owners for approval.

**8. QUESTIONS ABOUT THIS POLICY**

For more information about the Policy please contact:

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