



ACCESSIBLE CUSTOMER SERVICE

Intent

This policy is intended to meet the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act, 2005 and applies to the provision of goods and services to the public or other third parties, not the goods themselves.

All goods and services provided by the Hilton Toronto shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

- a) This policy applies to the provision of goods and services at the Hilton Toronto.
- b) This policy applies to employees, volunteers, agents and/or contractors who deal with the public or other third parties that act on behalf of the Hilton Toronto.
- c) The section of the policy that addresses the use of guide dogs, service animals and service dogs only applies to the provision of goods and services that take place at the premises of the hotel.

Definitions

Assistive Device – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that guests bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

Disability – the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- 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;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.



Guide Dog – is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the Blind Persons’ Rights Act, to provide mobility, safety and increased independence for people who are blind.

Service Animal – as reflected in Ontario Regulation 429/07, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Service Dog – as reflected in Health Protection and Promotion Act, Ontario Regulation 562 a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Support Person – as reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

General Principles

In accordance with the Accessibility Standards for Customer Service, Ontario Regulation 429/07, this policy addresses the following:

- A. The Provision of Goods and Services to Persons with Disabilities
- B. The Use of Assistive Devices
- C. The Use of Guide Dogs, Service Animals and Service Dogs
- D. The Use of Support Persons
- E. Notice of Service Disruptions
- F. Emergency Evacuations
- G. Customer Feedback
- H. Training

A. The Provision of Goods and Services to Persons with Disabilities

The Hilton Toronto will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all guests receive the same value and quality;
- allowing 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;



- using alternative methods when possible to ensure that guests with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the guest's disability.

B. Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the Hilton Toronto.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other measures will be used to ensure the access of goods and services.

C. Guide Dogs, Service Animals and Service Dogs

A guest with a disability that is accompanied by a guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas:

A guest with a disability that is accompanied by a guide dog or service dog will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the Health Protection and Promotion Act, Ontario Regulation 562.

Exclusion Guidelines:

If a guide dog, service animal or service dog is excluded by law (see applicable laws below) The Hotel will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

Applicable Laws:

The Health Protection and Promotion Act, Ontario Regulation 562 Section 60, normally does not allow animals in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale. It does allow guide dogs and service dogs to go into places where food is served, sold or offered for sale. However, other types of service animals are not included in this exception.

Dog Owners' Liability Act, Ontario: If there is a conflict between a provision of this Act or of a regulation under this or any other Act relating to banned breeds (such as pitbulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.



Recognizing a Guide Dog, Service Dog and/or Service Animal:

If it is not readily apparent that the animal is being used by the guest for reasons relating to his or her disability, the hotel staff may request verification from the guest.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability;
- a valid identification card signed by the Attorney General of Ontario; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The guest that is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies:

If a health and safety concern presents itself, for example in the form of a severe allergy to the animal, the hotel will make all reasonable efforts to meet the needs of all individuals.

D. Support Persons

If a guest with a disability is accompanied by a support person, the hotel will ensure that both persons are allowed to enter the premises together and that the guest is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the guest, prior to any conversation where confidential information might be discussed.

E. Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of the hotel. In the event of any temporary disruptions to facilities or services that guests with disabilities rely on to access or use the hotel's goods or services, reasonable efforts will be made to provide advanced notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- goods or services that are disrupted or unavailable



- reason for the disruption
- anticipated duration
- a description of alternative services or options

Notifications Options:

When disruptions occur the hotel will provide notice by:

- posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the hotel's website;
- contacting guests with reservations;
- verbally notifying guests when they are making a reservation; or
- by any other method that may be reasonable under the circumstances.

F. Emergency Evacuations

Any guest who may require assistance in an emergency evacuation may contact the hotel prior to check-in or notify the Guest Service Agent when arriving at the hotel.

Emergency Response information is available on the back of each guest room door and at the Front Desk. The hotel's Emergency Response Plan addresses the evacuation of guests with disabilities. If requested, the hotel will provide this information to the guest and discuss how to best assist them in an emergency evacuation. If requested, this information will be provided in an accessible format.

G. Feedback Process

The hotel shall provide guests with the opportunity to provide feedback on the service provided to guests with disabilities. Feedback forms along with alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

Submitting Feedback:

Guests who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any hotel employee. Guests that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

H. Training

Training will be provided to:

- a) All employees, who deal with the guests; for example: guest service agents, concierge, valet attendants, bell services, housekeeping and gift shop.
- b) Those who are involved in the development and approval of customer service policies, practices and procedures.



Training Provisions:

As reflected in Ontario Regulation 429/07, regardless of the format, training will cover the following:

- A review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005.
- A review of the requirements of the Accessibility Standards for Customer Service, Ontario Regulation 429/07.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
 - use assistive devices;
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing our services.
- The hotel's policies, procedures and practices pertaining to providing accessible customer service to guests with disabilities.

Training Schedule:

Training will be provided to all hotel employees. Revised training will be provided in the event of changes to legislation, procedures and/or practices.

Record of Training:

The hotel will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

Administration

If you have any questions or concerns about this policy or its related procedures please contact:

Jill Miller
Director of Human Resources
T: 416 860 6828
E: jill.miller@hilton.com

This policy and its related procedures will be reviewed as required in the event of legislative changes.



INTEGRATED ACCESSIBILITY STANDARDS

Intent

This policy has been established by the Hilton Toronto (Hotel) to govern the provision of its services in accordance with Regulation 191/11, "Integrated Accessibility Standards," (Regulation) under the Accessibility for Ontarians with Disabilities Act, 2005. These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications, employment and transportation.

The Hotel is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the Accessibility for Ontarians with Disabilities Act, 2005 in meeting the accessibility needs of persons with disabilities.

The Hilton Toronto endeavors to regularly ensure and implement accessibility standards in all of its practices.

Our Commitment

The Hilton Toronto is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

This policy will be implemented in accordance with the time frames established by the regulation as noted in the Hotel's Multi-Year Accessibility Plan.

Multi-Year Accessibility Plan

The Hotel will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, the Hotel will provide a copy of the Accessibility Plan in an accessible format.

Self-Service Kiosks

The Hilton Toronto will have consideration for accessibility when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities.



Training Team members and Volunteers

The Hotel will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to:

- all its team members and volunteers;
- all persons who participate in developing Hotel policies; and,
- all other persons who provide goods, services or facilities on behalf of the Hotel.

The training will be appropriate to the duties of the team members, volunteers and other persons. Team members will be trained when changes are made to the accessibility policy. New team members will be trained on the policy on their first day of employment, as well as during their New Hire Orientation Training session. The Hotel will keep a record of the training it provides.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

The Hilton Toronto will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, the Hotel will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

The Hotel will consult with the person making the request in determining the suitability of an accessible format or communication support.

The Hotel will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

The Hilton Toronto will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment, Assessment or Selection Process

The Hilton Toronto will notify its team members and the public about the availability of accommodation for applicants with disabilities in its recruitment process. On the Hilton Worldwide



career website, all applicants are provided with information of who to contact if they have a disability and need assistance completing a job application.

If a selected applicant requests an accommodation, the Hotel 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 due to disability.

Notice to Successful Applicants

When making offers of employment, the Hotel will notify the successful applicant of its policies for accommodating team members with disabilities.

Informing Team members of Supports

The Hotel will continue to inform its team members of its policies (and any updates to those policies) used to support team members with disabilities, including policies on the provision of job accommodations that take into account a team member's accessibility needs due to disability. This information will be provided to new team members as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Team members

Upon the request of a team member with a disability, the Hotel will consult with the team member to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other team members.

In determining the suitability of an accessible format or communication support, the Hotel will consult with the team member making the request.

Workplace Emergency Response Information

The Hotel will provide individualized workplace emergency response information to team members who have a disability, if the disability is such that the individualized information is necessary, and if the Hotel is aware of the need for accommodation due to the team member's disability. The hotel will make it known to all team members that assistance will be provided in the case of an emergency evacuation and to speak to the Human Resources Department if assistance may be required. The Hotel will develop individualized workplace emergency response information as soon as practicable after becoming aware of the need for accommodation. Where the team member requires assistance, the Hotel will, with the consent of the team member, provide the workplace emergency response information to the person designated by the Hotel to provide assistance to the team member.

The Hilton Toronto will review the individualized workplace emergency response information when the team member moves to a different location in the organization, when the team member's overall accommodations needs or plans are reviewed.



Documented Individual Accommodation Plans

The Hotel will maintain a written process for the development of documented individual accommodation plans for team members with disabilities. If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans. In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Plans

The Hilton Toronto maintains a documented return to work plan for its team members who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work plan outlines the steps the Hotel will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return to work process will not replace or override any other return to work process created by or under any other statute (ie., the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

The Hotel will take into account the accessibility needs of team members with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to team members, or when redeploying team members.

Questions about this policy

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

Jill Miller
Director of Human Resources
T: 416 860 6828
E: jill.miller@hilton.com

Appendix

Multi-Year Accessibility Plan



**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005
INTEGRATED ACCESSIBILITY STANDARDS: MULTI-YEAR ACCESSIBILITY PLAN
HILTON TORONTO**

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
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.	Policies have been developed and are available on the company website.	Complete	January 1, 2014
4	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> <p>b) Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) Review and update the accessibility</p>	<p>Accessibility Plan is developed and posted on company website. Plan is also available in an accessible format upon request.</p> <p>Management to review plan every five years</p>	Complete	January 1, 2014



		plan at least once every five years.			
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	<p>Identified all kiosks and will consider accessibility during replacement cycle.</p> <p>Kiosks include pay-parking machines and any self-serve stations open to guests and/or team members.</p>	Ongoing	January 1, 2014
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.	<p>Determine method of training and number of training levels.</p> <p>Human Resources representative will train all Department Managers on the AODA accessibility standards.</p> <p>Department Managers will deliver training to their team during a communication meeting</p>	In progress	January 1, 2015



PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
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.	<p>Conduct a review of all feedback processes across the organization internally and externally. Consult with all functional areas to make sure all feedback processes are captured.</p> <p>Determine what accessible formats and communication supports will be provided upon request.</p> <p>Ensure team members and management are aware of the need to accommodate upon request. This will be communicated in AODA training modules.</p>	In progress	January 1, 2015
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, a) in a timely manner that takes into account the person’s accessibility needs due to disability; and	Accessible formats and communication supports will be provided when requested. A Human Resources representative will consult with the person making the request to determine the best format or support to be provided.	Ongoing	January 1, 2016



		b) at a cost that is no more than the regular cost charged to other persons.	<p>Formats and supports will be provided in a timely manner (ie: upon request or within 24 hours)</p> <p>Communicate to team members and management that no additional charge is required. This will be communicated in AODA training modules.</p> <p>Communicate this requirement to new team members on first day of hire.</p>		
12		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>Communicate to team members and management this requirement. This will be communicated in AODA training modules.</p> <p>Communicate this requirement to new team members on first day of hire.</p> <p>Develop protocol for situations where suitable agreement cannot be reached.</p>	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Policy posted on company website.	Complete	January 1, 2016



13	Emergency Procedures, Plans or Public Safety Info	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.	<p>Policy posted on company website.</p> <p>Policy includes information of who to contact if assistance is needed in an emergency evacuation.</p> <p>This requirement has been communicated to all relevant team members and managers.</p> <p>This requirement will be reviewed in AODA training modules.</p> <p>This requirement is communicated to new team members on first day of hire.</p>		January 1, 2012
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.	<p>The Hilton Toronto website currently complies with the Level A success criteria of the Website Content Accessibility Guidelines 2.0 (WCAG 2.0).</p> <p>Our site was designed and developed with these guidelines in mind. We have tested our website to ensure that it is usable by guests who use assistive</p>	Ongoing	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.



			<p>technology.</p> <p>We will work with Hilton Worldwide to ensure all our internet websites and web content comply with WCAG 2.0 Level AA by the compliance deadline.</p>		<p>January 1, 2021</p> <p>All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none">• Success criteria 1.2.4 Captions (Live)• Success criteria 1.2.5 Audio Descriptions (Pre-recorded).
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PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
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.	<p>A statement to be included on the Hilton Worldwide Careers website indicating the availability of accommodation for applicants with disabilities and contact information for further support.</p> <p>Include statement in recruitment and marketing collateral, if used.</p>	In progress	January 1, 2016
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>(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>Statement to be included when contacting applicants via telephone or email. This will be performed by a Human Resources representative.</p> <p>Consider including a statement to all applicants when corresponding through Taleo Recruitment System.</p> <p>Identify the verbiage to be used.</p> <p>Identify barriers: location of interview room, format of tests, room set-up for in person interviews, interview timelines, support, paperwork, etc.</p> <p>Review and revise interview</p>	In progress	January 1, 2016



			guidelines for suitability.		
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.	Consider adding a statement in the offer letter.	In progress	January 1, 2016
25	Informing Employees 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.	Communicate to team members and management this requirement. This will be communicated in AODA training modules.	In progress	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Circulate AODA policies and Accessibility Plan on first day of hire. Include in New Hire Orientation training	In progress	January 1, 2016
25		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.	Updates will be communicated to all hotel team members. Some examples of possible communication are: posting on the Health & Safety notice board, AODA team member training, distribution of updated policies.	Ongoing	January 1, 2016



26	Accessible Formats & Communication Supports for Employees	<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>Employer will consult with team members on an individual basis to provide appropriate accessible formats, if requested.</p> <p>Communicate this requirement to new team members on first day of hire.</p>	Ongoing	January 1, 2016
26		<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>Employer will consult with team members on an individual basis to provide appropriate accessible formats.</p>	Ongoing	January 1, 2016



27	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.	<p>Communicate to all team members through Health & Safety notice board that individualized emergency response information will be provided, if necessary, to those who require it. This notice indicates to contact a Human Resources representative for further information.</p> <p>New team members will be asked on their first day if they require assistance in an emergency. They are informed that individualize workplace emergency response information is available upon request.</p> <p>When requested, individualized workplace emergency response information will be developed on an individual basis based on the team member's needs.</p> <p>In addition, all team members who have identified themselves as having a disability through our Employment Equity questionnaire will be followed up with on an individual basis to determine if individualized emergency response information is required.</p>	Complete	January 1, 2012
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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.	When individualized workplace emergency response information is developed, the appropriate information will be communicated by a Human Resources representative to the person designated in the plan to provide assistance (ex. Department Manager).	Complete	January 1, 2012
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.	All new hires will be asked in an optional self-identification questionnaire if they have a disability. They will also be asked if they require any assistance in an emergency evacuation. If the team member does require individualized emergency response information, a plan will be developed to address the team member's needs as soon as possible (preferably within 2 weeks of hire)	Complete	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization;	The emergency response plan will be reviewed: (a) If and when the team member transfers to another Hilton Worldwide hotel	Complete	January 1, 2012



		(b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	(b) Every 5 years to ensure all information is relevant (c) When general hotel emergency response policies are reviewed		
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.	A form has been developed by the Human Resources Department. If a team member indicates that he or she will require individualized emergency response information, a Human Resources representative will work with the team member to complete the form and develop the individualized emergency response plan. The plan will be signed by the team member as a sign of approval and as consent to share the information with those designated to help in an emergency situation. The plan will be kept in the team member's confidential personnel file.	Complete	January 1, 2016
28		28 (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can	(1) A form has been developed by the Human Resources Department to be used when creating individualized emergency response plans. The team member, or support person if	Complete	January 1, 2016



		<p>participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>3. 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.</p> <p>4. The manner in which the employee 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>necessary, will be consulted to develop an individualized plan.</p> <p>(2) The team member's needs will be assessed through interviews with the team member or support worker. This process will be modified on an individual basis, if required, to meet the team member's needs.</p> <p>(3) If necessary, the hotel will provide the team member with an Internal Ability Form to determine the team member's limitations and whether accommodation is required.</p> <p>(4) If requested, the hotel may allow a unionized team member to be represented by a union shop steward.</p> <p>(5) All team members' personal information will be kept confidential as per Hilton Worldwide's Information Security & Privacy policy. All information will be kept in the team member's personnel file within the Human Resources Department</p> <p>(6) The emergency response plan</p>		
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		<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>will be reviewed:</p> <ul style="list-style-type: none"> (a) If and when the team member transfer to another Hilton Worldwide hotel (b) Every 5 years to ensure all information is relevant (c) When general hotel emergency response policies are reviewed <p>The team member will be consulted on an individual basis for review of the plan. This will be done through interviews with the team member or support worker. This process will be modified on an individual basis, if required, to meet the team member's needs.</p> <p>(7) If an accommodation plan is denied, this will be communicated in writing to the team member (and support worker, union representative, if necessary) with specific reasons for the denial.</p> <p>(8) The hotel will provide an accommodation plan in an accessible format, if requested. This will be determined on an individual basis.</p>		
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	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</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>The hotel will develop a return to work plan for all team members who require disability-related accommodations in order to return to work. This plan will be discussed with and signed by the team member. The plan will be kept in the team member's personnel file. Further information is provided in the hotel's Return To Work Policy.</p>	Complete	January 1, 2016
29		<p>29. (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 individual documented accommodation plans, as described in section 28, as part of the process.</p>	<p>The return to work letter will be provided by a Human Resources representative of a Department Manager. The letter documents specifics steps the hotel will take to facilitate the return to work of team members who were absent as well as individual accommodation plans, which may include temporary modified work duties.</p>	Complete	January 1, 2016
29		<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>This will be documented in our policy.</p>	In progress	January 1, 2016



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 performance management process in respect of employees with disabilities.	Individual plans will be taken into account.	Complete	January 1, 2016
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.	Individual plans will be taken into account.	Complete	January 1, 2016
32	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.	Individual plans will be taken into account.	Complete	January 1, 2016