

## 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 Airport Hotel and Suites 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 Airport Hotel and Suites.
- 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 Airport Hotel and Suites.
- 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. Customer Feedback
- G. Training

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

The Hilton Toronto Airport Hotel and Suites 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.
- Providing Hotel accessibility policies upon request in an accessible format, copies available through the Front Office and Human Resources.

## B. Assistive Devices

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

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. 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.

#### G. Training

Training will be provided to:

- a) All employees, who deal with the guests; for example: Front Office Agents, Guest Services Agents and Housekeeping Room Attendants.
- 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 team members. 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**

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

If you have any questions or concerns about this policy or its related procedures please contact the hotel's Human Resources Director.

Christine Granger  
Human Resources Director  
T: 905-678-5444  
E: Christine.Granger@Hilton.com



# Integrated Accessibility Standards Policy and Procedures

Issued: December 12, 2013  
Reviewed: December 11, 2017

## Intent

The following policy has been established by the Hilton Toronto Airport Hotel & Suites (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 Airport Hotel & Suites endeavors to regularly ensure and implement accessibility standards in all of its practices.

## Our Commitment

The Hilton Toronto Airport Hotel & Suites 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**.

## 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 Airport Hotel & Suites will have consideration for accessibility when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities.

## **Training Employees 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 employees 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 employees, volunteers and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained during their New Hire Orientation training session, within the first 14 days of employment as per our brand standards.

The Hotel will keep a record of the training it provides.

## **A. INFORMATION AND COMMUNICATIONS STANDARDS**

### **Feedback**

The Hilton Toronto Airport Hotel & Suites 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 Airport Hotel & Suites 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.



## **B. EMPLOYMENT STANDARDS**

### **Recruitment**

The Hilton Toronto Airport Hotel & Suites will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### **Recruitment, Assessment or Selection Process**

The Hotel will notify 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.

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 employees with disabilities.

### **Informing Employees of Supports**

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

### **Accessible Formats and Communication Supports for Employees**

Upon the request of an employee with a disability, the Hotel will consult with the employee 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 employees.

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

### **Workplace Emergency Response Information**

The Hotel will provide individualized workplace emergency response information to employees 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 employee's disability. The Hotel will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, the Hotel will, with the consent of the employee, provide the workplace emergency response information to the person designated by the Hotel to provide assistance to the employee.

The Hilton Toronto Airport Hotel & Suites will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee'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 employees 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 Process**

The Hilton Toronto Airport Hotel & Suites maintains a documented return to work process for its employees 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 process 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 employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

### **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:

Christine Granger  
Human Resources Director  
T: 905-678-5444 E: Christine.Granger@Hilton.com

**Appendix**  
Multi-Year Accessibility Plan

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005**

**INTEGRATED ACCESSIBILITY STANDARDS: MULTI-YEAR ACCESSIBILITY PLAN**

**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.	<p>Policy developed and approved by Hotel General Manager.</p> <p>Policy communicated to team members in shift briefings.</p>	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>Attended AODA workshop and completed the hotel’s multi-year plan.</p> <p>Hilton Worldwide Marketing and IT teams to post accessibility plan and policies on hotel’s web site.</p> <p>Management will review annually.</p>	Complete	January 1, 2014

		c) review and update the accessibility 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.	Identified all kiosks and will consider accessibility during replacement cycle.  Kiosks include ATMs, pay-parking machines, any self-serve stations open to guests and/or team members.	Complete	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.	To determine method of training and number of training levels.  Require separate training module for senior management and one for all employees... classroom, e-learning, or blended.	Complete	January 1, 2015

**PART II – Information and Communications Standards**

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>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>	<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>	Complete	January 1, 2015
12	Accessible Formats & Communication Supports	<p>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,</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>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</p> <p>Ensure these formats and supports can be provided in a timely manner (ie: upon request or within 24 hours)</p>	Complete	January 1, 2016

			Communicate to team members and management that no additional charge is required. This will be communicated in AODA training modules.		
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.	Communicate to team members and management this requirement. This will be communicated in AODA training modules.  Develop protocol for situations where suitable agreement cannot be reached.	Complete	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Posted on website (IT).  Include notice on some print materials (marketing).	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.	Accessible formats are available at Front Desk and HR. Communicated this to team members in shift briefings. This will be also be communicated in AODA training modules in the future.	Complete	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.	Review underway of required changes that need to be made to websites by Jan. 1 <sup>st</sup> 2014  Involve HW Corporate IT, to continuously review WCAG guidelines to be informed of changes and updates.	Complete          Ongoing	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.  January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> </ul>



					<ul style="list-style-type: none"><li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li></ul>
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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>Include a statement in recruitment and marketing collateral used as well as the job posting itself.</p> <p>Example: We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs.</p>	Complete	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>Applicants will be notified by telephone.</p> <p>Identify the language 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.</p> <p>Review and revise interview guidelines for suitability.</p>	Complete	January 1, 2016
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for	A statement will be included in the offer letter.	Completed	January 1, 2016

		accommodating employees with disabilities.			
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.	This will be communicated in AODA training modules and through new team member orientation.	Complete	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.	Part of the New Hire Orientation training.	Complete	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.	See 25(1)	As needed	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>	Employer will consult with employees to determine and arrange for suitable formats and communication formats.	Complete	January 1, 2016
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	List what the employee will require: policy, communication supports that are available (text to speech, braille, large print,	Complete	January 1, 2016

			accessible PDFs, plain language versions, closed captioning) .		
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 and request that team members self identify need for accommodation in New Hire Orientation.</p> <p>Include need for accommodation on the new hire check list.</p> <p>Prepare individual plan as required.</p>	Complete	January 1, 2012
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.	Implement 'Buddy System' as required.	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.	Information provided to team member by HR in suitable format.	Complete	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information,	Include on 'Personal Action Form" check list.	Complete	January 1, 2012

		<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>Include in the emergency response/evacuation procedures for team members.</p>		
28	Documented Individual Accommodation Plans	<p>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.</p>	<p>Develop a process.</p> <p>Determine who needs to be involved.</p> <p>Use template.</p>	Complete	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to</li> </ol>	<p>Use template.</p>	Complete	January 1, 2016

		<p>determine if and how accommodation can be achieved.</p> <ol style="list-style-type: none"><li>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.</li><li>5. The steps taken to protect the privacy of the employee's personal.</li><li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li><li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li><li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li></ol>			
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29	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>Review to ensure current process to ensure it meets requirements.</p> <p>If not, develop process for employees RTW after a disability related leave of absence.</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>	Identify steps – how will we do this, who will we include.	Complete	January 1, 2016
29		29. (3) The return to work process referenced in this section does not replace or override any other return to	This will be part of the checklist.	Complete	January 1, 2016



		work process created by or under any other statute.			
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.	Review the current process. Need to keep individual accommodation plans in mind.	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.	Review the current process. Need to keep individual plans in mind.	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.	Review the current process Keeping in mind the individual plans.	Complete	January 1, 2016