



## Canada Lands Company CLC Limited Multi-year Accessibility Plan

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### INTRODUCTION:

#### *Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”)*

The AODA develops, implements and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures and premises are accessible to persons with disabilities. The AODA intends to achieve an accessible Ontario by January 1, 2025. To do so, mandatory and enforceable standards have been implemented in Ontario.

These standards include:

#### **Customer Service Standard – Ontario Regulation 429/07**

The Customer Service Standard (Ontario Regulation 429/07) was the first standard under the AODA to become law. It ensures that people with disabilities can receive goods and services in a manner that takes into account one’s disability.

Requirements include development of a policy, practices, procedures as well as the provisions of training staff and volunteers.

Canada Lands Company CLC Limited submitted compliance reports to the Province indicating that we have addressed the requirements of the regulation and are meeting the compliance obligation. We will continue to ensure compliance with the Customer Service Standard.

#### **Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11**

The IASR brings together the following standard areas into one Regulation: Information and Communication, Employment, Built Environment and Transportation. The transportation standard does not apply to Canada Lands Company CLC Limited.

General requirements common to all standards include policy development and training. The requirements have staggered compliance dates up to the year 2021.

**MULTI-YEAR ACCESSIBILITY PLAN:**

The multi-year accessibility plan was developed in accordance with the IASR. It outlines CLC's strategy to prevent and remove barriers, as well as address the current and future requirements of the AODA.

This document was created in November 2014 and must be reviewed and updated by November 2019.

<b>Part I – General</b>			
This section of the Regulation requires us to:			
<ul style="list-style-type: none"> <li>▪ develop and maintain an accessibility policy and a multi-year accessibility plan</li> <li>▪ ensure staff and volunteers are trained on the Integrated Accessibility Standards Regulation and the Ontario Human Rights Code</li> </ul>			
<b>Action</b>	<b>Compliance Date</b>	<b>Responsibility</b>	<b>Status</b>
<b>Establishment of Accessibility Policies</b> <ul style="list-style-type: none"> <li>▪ Develop and implement Integrated Accessibility Standards Policy(s)</li> <li>▪ Make the Policy(s) publicly available and provide in accessible format, upon request</li> <li>▪ Review and update policy(s) as required</li> </ul>	January 1, 2014	Human Resources	Completed <input type="checkbox"/> <input type="checkbox"/>
<b>Develop a Multi-year Accessibility Plan</b> <ul style="list-style-type: none"> <li>▪ Develop a multi-year accessibility plan</li> <li>▪ Post multi-year accessibility plan on website and provide in accessible format, upon request</li> <li>▪ Review and update the plan at least once every five (5) years</li> </ul>	January 1, 2014	Human Resources	Completed <input type="checkbox"/> <input type="checkbox"/>  Plan to be reviewed and updated by November 2019
<b>Training</b> <ul style="list-style-type: none"> <li>▪ Ensure training is developed on the ISAR and the Human Rights Code as it pertains to persons with disabilities and is provided to employees, volunteers, persons who participate in developing policies and others who provide goods, services or facilities on behalf of CLC</li> <li>▪ Update training as required</li> <li>▪ Keep a record of the dates of training and the individuals who have received the training</li> </ul>	January 1, 2015 (and ongoing)	Human Resources	In Progress ...



<b>Part II – Information and communication</b>			
This section of the Regulation includes requirements related to:			
<ul style="list-style-type: none"> <li>▪ Accessible feedback processes</li> <li>▪ Accessible formats and communications support</li> <li>▪ Publically available emergency procedures, plans and public safety information</li> <li>▪ Accessible websites and web content</li> </ul>			
Action	Compliance date	Responsibility	Status
<b>Feedback process</b> <ul style="list-style-type: none"> <li>▪ Ensure that processes for receiving and responding to feedback are accessible and meet the requirements of the IASR</li> </ul>	January 1, 2015	Human Resources/ Communications/ Marketing	<i>In Progress ...</i>
<b>Accessible formats and communication support</b> <ul style="list-style-type: none"> <li>▪ Upon request, and to the extent practical, provide for provision of accessible formats and communication supports for persons with disabilities</li> <li>▪ Consult with person making the request to determine suitability of accessible format or communication support</li> <li>▪ Put a statement on the website that CLC shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities at a cost no more than regular cost charged to other persons</li> </ul>	January 1, 2016	Human Resources/ Communications/ Marketing	
<b>Emergency procedures, plans or public safety information</b> <ul style="list-style-type: none"> <li>▪ Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an accessible format or with appropriate communication supports, upon request as soon as practical</li> </ul>	January 1, 2012	Human Resources/ Communications	<i>Completed</i> <input type="checkbox"/> <input type="checkbox"/>
<b>Accessible websites and web content</b> <ul style="list-style-type: none"> <li>▪ Websites and web content published after 2012 are to conform with WCAG 2.0 Level A initially and increasing to WCAG 2.0 Level AA by January 1, 2021, to the extent practical, other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions)</li> </ul>	Beginning Jan. 1, 2014 and ongoing through to Jan. 1, 2021	Communications/ Marketing	<i>In Progress...</i>



<b>Part III – Employment standards</b>			
<b>This section of the regulation includes requirements related to:</b>			
<ul style="list-style-type: none"> <li>▪ Recruitment, assessment and selection</li> <li>▪ Accessible formats and communication support for employees</li> <li>▪ Workplace emergency response</li> <li>▪ Individual accommodation plans and return to work processes</li> <li>▪ Performance management, career development and redeployment</li> </ul>			
<b>Action</b>	<b>Compliance Date</b>	<b>Responsibility</b>	<b>Status</b>
<b>Recruitment – General</b> <ul style="list-style-type: none"> <li>▪ Notify employees and public, by putting a statement on all CLC job advertisements, about the availability of accommodation for applicants with disabilities</li> </ul>	January 1, 2016	Human Resources	
<b>Recruitment – Assessment or selection process</b> <ul style="list-style-type: none"> <li>▪ Notify applicants when 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</li> <li>▪ If request is submitted, CLC will consult with the applicant and provide or arrange for the provisions of a suitable accommodation in a manner that takes into account the applicant’s needs due to disability</li> </ul>	January 1, 2016	Human Resources	
<b>Notice to successful applicants</b> <ul style="list-style-type: none"> <li>▪ Notify successful applicants of CLC policies for accommodating employees with disabilities, when making offers of employment</li> </ul>	January 1, 2016	Human Resources	
<b>Informing employees of supports</b> <ul style="list-style-type: none"> <li>▪ Inform current employees and new hires as soon as practical after they begin employment about CLC policies supporting employees with disabilities</li> <li>▪ Keep employees up to date on changes to policies/procedures relating to accommodation</li> </ul>	January 1, 2016	Human Resources	
<b>Accessible formats and communication support for employees</b> <ul style="list-style-type: none"> <li>▪ When requested by an employee with a disability, CLC shall consult with the employee and provide or arrange for the provision of suitable accessible formats and communication supports needed to perform the employee’s job</li> </ul>	January 1, 2016	Human Resources	



<b>Workplace emergency response information</b> <ul style="list-style-type: none"><li>▪ Prepare individualized workplace emergency response information and procedures for CLC employees with disabilities, if the disability is such that the individualized information is necessary and CLC is aware of the need for accommodation</li></ul>	January 1, 2012	Human Resources	<i>Completed</i> <input type="checkbox"/> <input type="checkbox"/>
<b>Documented individual accommodation plans / return to work process</b> <ul style="list-style-type: none"><li>▪ Create a written process for the development of documented individual accommodation plans and return to work plans for employees with disabilities</li><li>▪ Ensure the process and plans include all of the requirement elements in accordance with the provisions of the IASR</li></ul>	January 1, 2016	Human Resources	
<b>Performance management, career development, advancement and redeployment</b> <ul style="list-style-type: none"><li>▪ Review and update existing policies, procedures and practices to ensure compliance with the IASR</li><li>▪ Take the accessibility needs of employees with disabilities and, as applicable, individual accommodation plans, into account during the annual performance management process, when providing career development and advancement opportunities, and when considering redeployment</li></ul>	January 1, 2016	Human Resources	



**Part IV.1 – Design of public spaces standard**

This section of the regulation includes requirements related to:

- Recreation trails
- Outdoor public use eating and outdoor play areas
- Exterior paths of travel
- Accessible Parking
- Obtaining services
- Maintenance

*NOTE: Requirements of this standard apply to public spaces that are newly constructed or redeveloped on or after January 1, 2017.*

*Unplanned changes to existing public spaces to meet the standard are not required (including emergency repairs or forced changes that were not anticipated or planned for in advance).*

Action	Compliance date	Responsibility	Status
<p><b>Recreation trails</b></p> <ul style="list-style-type: none"> <li>▪ Where practical, all newly constructed and redeveloped recreation trails shall meet the technical requirements in accordance with provisions of the ISAR</li> </ul>	January 1, 2017	Real Estate / Facilities & Engineering	
<p><b>Outdoor public use eating areas and outdoor play areas</b></p> <ul style="list-style-type: none"> <li>▪ Where practical, all newly constructed and redeveloped outdoor public use eating areas and outdoor play areas shall meet the technical requirements in accordance with provisions of the ISAR</li> </ul>	January 1, 2017	Real Estate / Facilities & Engineering	
<p><b>Exterior paths of travel</b></p> <ul style="list-style-type: none"> <li>▪ When practical, all newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel intended to serve a functional purpose and not to provide a recreational experience shall meet the technical requirements in accordance with provisions of the ISAR.</li> <li>▪ This requirement would include stairs, ramps, curb ramps, depressed curbs, pedestrian signals and rest areas</li> </ul>	January 1, 2017	Real Estate / Facilities & Engineering	
<p><b>Accessible parking</b></p> <ul style="list-style-type: none"> <li>▪ Where practical, all newly constructed and redeveloped parking areas shall meet the technical requirements in accordance with provisions of the ISAR</li> </ul>	January 1, 2017	Real Estate / Facilities & Engineering	



<b>Obtaining services</b> <ul style="list-style-type: none"><li>▪ Where practical, all newly constructed or redeveloped service counters, fixed queuing guides and waiting areas shall meet the technical requirements in accordance with provisions of the ISAR</li></ul>	January 1, 2017	Real Estate / Facilities & Engineering	
<b>Maintenance</b> <ul style="list-style-type: none"><li>▪ Identify preventative and emergency maintenance procedures for accessible elements in public spaces</li><li>▪ Identify procedures for dealing with temporary disruptions when accessible elements required are not in working order</li></ul>	January 1, 2017	Real Estate / Facilities & Engineering	