

Multi-Year Accessibility Plan

HIROC is committed to providing a barrier-free environment for all stakeholders, including our subscribers, employees, job applicants, suppliers, the public and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (AODA) and its associated standards and regulations and will ensure that we offer a safe and welcoming environment that is respectful of each person's dignity and independence.

As an organization, HIROC is dedicated to meeting the needs of individuals with disabilities in a timely manner. We understand that providing a barrier-free environment is a shared effort, and as an organization, we are committed to working with the necessary parties to make accessibility a reality for all.

Questions or concerns regarding HIROC's Accessibility Policy and Multi-Year Accessibility Plan are to be directed to the Human Resources Coordinator or submitted via the company's AODA Feedback Process. We encourage any individual interested in providing feedback to do so by any of the following means:

By phone to: 416-733-2773

By email to: hr@hiroc.com;

By mail to: 4711 Yonge Street, Suite 1600, Toronto, ON M2N 6K8

Via online at: www.hiroc.com

Multi-Year Accessibility Plan

Accessibility Requirement	Status	Compliance Deadline	Responsibility
Customer Service			
<i>Accessible Customer Service Policy</i> <ol style="list-style-type: none">1. Develop and implement an Accessible Customer Service Policy addressing all requirements under the regulation.2. Develop and deliver training to all staff, volunteers, and individuals completing work on behalf of HIROC that may provide assistance to the public. Provide training to all new staff.	Completed/ Ongoing	01/01/12	HR

<p>3. Develop and make public a process for receiving and responding to feedback from customers with disabilities.</p>			
<p><i>HIROC's Action Plan</i></p> <ol style="list-style-type: none"> 1. HIROC has developed and implemented an Accessible Customer Service Policy specific to the organization. This policy is updated and maintained by the HR department. 2. Online training is available and delivered to all current staff. All new staff is required to participate in and complete an online AODA Customer Service Training. Certification/record of completed training is retained. 3. HIROC has developed and made public a process for receiving and responding to feedback from customers with disabilities. The feedback process is inclusive of multiple means by which feedback can be received, including by phone, email, mail and via online correspondence. Client-facing employees have been informed of and trained on the company's feedback process. 			
<p>Part 1 - General Requirements</p>			
<p><i>Accessibility Policies</i></p> <ol style="list-style-type: none"> 1. Create and make public a statement of commitment. 2. Develop and implement company-specific accessibility policies. 	<p>Completed/ Ongoing</p>	<p>01/01/14</p>	<p>HR</p>
<p><i>HIROC's Action Plan</i></p> <ol style="list-style-type: none"> 1. HIROC has created and made public a statement of commitment. The statement of commitment is located on the company's website and on all Job Descriptions. 2. HIROC's policies and procedures have been reviewed to identify current and future barriers to accessibility. Identified barriers have been addressed and policies amended. <p><i>* Alternative formats of the policy will be made available upon request.</i></p>			
<p><i>Multi-Year Accessibility Plan</i></p> <ol style="list-style-type: none"> 1. Create and make public a multi-year accessibility plan. 2. Provide the plan in accessible formats 	<p>Completed/ Ongoing</p> <p><i>Plan to be reviewed and updated by Jan 1, 2019</i></p>	<p>01/01/14</p>	<p>HR</p>

<p>upon request.</p> <p>3. Review the plan every five (5) years.</p>			
<p><i>HIROC's Action Plan</i></p> <ol style="list-style-type: none"> 1. All applicable IASR requirements have been reviewed to develop a living Accessibility Plan. Roles of all internal stakeholders have been reviewed to determine how each will be affected by requirements. The Accessibility Plan has been created to include training, procedures and policy development to ensure the identification and removal of barriers. The plan has been approved and is available to the public. 2. Requests for accessible formats of this document will be forwarded to the HR Coordinator who will work with the individual to determine the most suitable format. 3. This plan will be amended as required and will be reviewed fully by January 1, 2019 and every five (5) years thereafter. 			
<p><i>Training</i></p> <ul style="list-style-type: none"> • Train all employees, including contract/interns on applicable IASR requirements and the organization's responsibilities under the Human Rights Code (as it pertains to persons with disabilities). 	<p>Completed/ Ongoing</p>	<p>01/01/15</p>	<p>HR</p>
<p><i>HIROC's Action Plan</i></p> <ol style="list-style-type: none"> 1. Training* for new employees will be delivered via online training modules covering all applicable content as required under the IASR: <ol style="list-style-type: none"> a. Integrated Accessibility Standards -Information/Communication and Employment; and b. Understanding Human Rights Training (AODA edition). 2. Prior to January 1, 2015, all current employees will complete the IASR and Human Rights Code training 3. As of January 1, 2015, all new employees (including contract and intern positions) will be required to complete the above training as part of their orientation with the company. 4. Certification/record of completed training will be retained. <ul style="list-style-type: none"> • <i>* Training will also be made available via alternate formats including in-person presentation, as</i> 			

requested.

Part II - Information and Communication Standard

Accessible Websites and Web Content

- Ensure website and web content published after January 1, 2012 conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, level A.

Completed/ Ongoing

01/01/14

IT Department/
HR

HIROC's Action Plan

1. To date, HIROC public website and its content meet all requirements under the WCAG 2.0 level A.
2. HIROC's IT department is fully aware of WCAG requirements and will ensure all new content and/or any substantial refreshes to the site conform to established guidelines.

Feedback

- Upon request, be able to receive and respond to feedback from clients, individuals inquiring about HIROC, our employees and members of the public who have a disability.

Completed/Ongoing

01/01/15

HR/Department
Managers

HIROC's Action Plan

1. A process for receiving and responding to accessible feedback requests has been developed and communicated to all relevant employees. Currently HIROC can facilitate requests via the phone, email and mail.
2. HIROC will take the following steps to make sure existing feedback processes are accessible to people with disabilities upon request by January 1, 2015: We will identify all existing feedback processes and will review those processes for accessibility. Should any barriers to accessibility be identified we will take steps to remove those barriers prior to January 1, 2015.
3. All other employees will be notified as to the internal party to whom they should direct any accessible feedback requests.

<p><i>Accessible Formats and Communication Supports</i></p> <ol style="list-style-type: none"> 1. Upon request, provide accessible formats and communication supports to individuals with disabilities. 2. Notify the public of the availability of accessible formats and communication supports. 3. Where a communication support or accessible format cannot be provided immediately, consult with the client to arrange for a suitable format as soon as possible. 	Ongoing	01/01/16	HR/Department Managers
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HIROC's Action Plan

1. We will ensure that all of our publicly available information is made accessible upon request by January 1, 2016. Where a request for an accessible format or for communication supports is received, we will: Consult with the individual making the request to determine their accessibility needs and what would be a suitable format or support, provide the requested information in a timely manner.

Part III - Employment Standard

<p><i>Workplace Emergency Response Information</i></p> <ol style="list-style-type: none"> 1. Create and implement individualized plans to assist employees with disabilities during an emergency. 2. Obtain consent from employees with individualized plans to disclose emergency response or evacuations plans to the person responsible for assisting the employee in situations where the plan requires the assistance of a colleague. 3. Create and provide emergency information formatted in such a way that the employee with the disability can 	Ongoing (based on employee needs)	01/01/12	HR/Department Managers
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<p>understand its contents/direction as soon as practicable following the receipt of the request and/or becoming aware of the need for an individualized plan.</p> <p>4. Review the individualized plan/information:</p> <ul style="list-style-type: none"> a. When the employee moves to a different location in the office; b. When the employee's overall accommodation needs and plan are reviewed; and c. When the company reviews its general emergency response policies. 			
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HIROC's Action Plan

1. Provide individualized workplace emergency response information to employees who have a disability.
2. The process for providing emergency information includes alternative formats and will be completed in a timely manner upon receipt of the request or becoming aware of the need for an individualized plan.
3. The process/policy used by the HR department to develop an individualized emergency response plan includes the requirement that consent is obtained from the requesting employee to disclose the contents of the plan to the individual required to provide assistance when responding to the emergency or evacuation. The process for obtaining consent also includes obtaining the acknowledgement of the employee designated to provide the assistance that the confidentiality of the individualized plan will be maintained, unless the health and safety of either party is potentially compromised.
4. Individualized emergency plans include the requirement that the plan be reviewed:
 - a. If the employee moves to another location within the office that would affect that person's ability to respond to the emergency or evacuation (the ability of the individual designated to provide assistance, where needed, will also be considered);
 - b. On a recurring timeline, to be established during the creation of the individualized emergency response plan. Factors that are taken into consideration when developing

the recurring timeline (i.e. once every six (6) months, annually, etc.) include the nature and severity of the disability as well as its classification of permanent or temporary. A review of the plan will also be initiated if requested by the employee; and

- c. When the company amends its emergency response and/or evacuation procedures.

Documented Individual Accommodation Plans

- Develop and implement a written process for the development of documented individual accommodation plans for employees with disabilities.

Ongoing

01/01/16

HR/Department Managers

HIROC's Action Plan

1. HIROC will develop and implement a written process for the development of documented individual accommodation plans for employees with disabilities. As per IASR requirements, the plan will include the following elements:

- a. The manner in which an employee requesting accommodation can participate in the development of the accommodation plan;
 - HIROC will endeavor to ensure the employee is able to actively participate in the development of the accommodation plan. Limitations will be identified and clearly communicated to the employee prior to the development of the plan.
- b. The means by which the employee is assessed on an individual basis.
- c. The manner in which HIROC can request the participation of a representative from the company in the development of the accommodation plan.
- d. The steps that will be taken to protect the privacy of the employee's personal information;
 - The content of the accommodation plan will be restricted to only those required to facilitate the plan or supervise the employee. The accommodation plan template will include a section identifying the individuals that will have knowledge of the plan and will require each person to sign an acknowledgement of the confidentiality of its contents.
- e. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- f. An outline of how the reasons for a denial of an accommodation will be communicated

to the requesting employee;

- Employees will be informed of the factors that will be taken into consideration by the company when a request for accommodation is received as well as employer and employee expectations and responsibilities.
- g. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to a disability;
 - Accommodation plan documents will be made available in accessible formats.
- h. The accommodation plan template will include a section regarding the provision of accessible formats and communication supports to be completed in the event that such supports are required by the employee.
- i. The accommodation plan will also include an emergency response/evacuation plan if required by the employee.
- j. The accommodation plan will be created to include a section outlining additional accommodations that are required.

<p><i>Recruitment, Assessment and Selection</i></p> <ol style="list-style-type: none"> 1. Notify employees and the public about the availability of accommodation for applicants with disabilities in the company's recruitment processes. 2. During the recruitment process, notify applicants selected to participate in our selection and assessment processes that accommodations are available upon request and in relation to the materials and/or processes used by HIROC. 3. Should a job applicant request accommodation, consult with the individual and make adjustments to best suit his/her needs. 4. Notify successful applicants of the company's policies for accommodating employees with disabilities. 	<p>Completed/Ongoing</p>	<p>01/01/16</p>	<p>HR/Department Managers</p>
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HIROC's Action Plan

1. HIROC has an accessibility statement posted on our online Careers page notifying applicants that reasonable accommodations will be made upon request to ensure that individuals with disabilities are able to fully participate in our recruitment efforts. As not all applicants apply through our Careers page, this statement will also be included on future job postings to ensure that it is properly communicated to all potential applicants.
2. Successful applicants will be informed of the availability of accommodations relating to HIROC's selection/assessment processes upon initial contact from the hiring manager or HR Coordinator;
 - a. All assessment methods utilized by the company will be reviewed and alternates developed to facilitate accessibility requests;
 - b. When updating or amending assessment/selection methods, an assessment will be conducted to identify potential barriers and alternative/accessible formats will be developed; and
 - c. Any accommodation request pertaining to the company's selection/assessment methods that cannot be met with current alternate formats will be forwarded to the HR Coordinator who will work with the individual to develop an acceptable alternative.
3. When scheduling interviews, HIROCs will include a statement in all email confirmations indicating to the applicant that accommodations are available and inviting the applicant to inform the hiring manager/HR Coordinator of any necessary accommodations.
4. Our internal Accommodation Policy will be provided to all new hires as part of their orientation package. This policy includes all of the means by which HIROC will support employees with disabilities; also included are accessible formats and communication supports, and the availability of accessible performance management, career development and job change processes. Alternative formats of the policy will be made available upon request.

Accessible Formats and Communication Supports for Employees

1. Where an employee with a disability requests it, work with that individual to provide or arrange for the provision of accessible formats and communication supports for:
 - a. Information that is needed in order to perform the employee's

Completed/Ongoing

01/01/15

HR/Department Managers

<p>job; and</p> <p>b. Information that is generally available to employees in the workplace.</p> <p>2. Where a request is made, work with the requesting employee to determine the suitability of the proposed accessible format/communication support.</p>			
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HIROC's Action Plan

1. The availability of accessible formats and communication supports has been communicated to all employees through the company's internal Accommodation Policy. All future employees will be made aware of their availability through the same policy which is provided with the new hire orientation package. HIROC has completed a review of information that is provided to employees and the manner in which it is provided. Information that is needed to perform an employee's job is generally provided via one-on-one or group training sessions whereas information that is generally available in the workplace is typically provided in written policy format available in hardcopy or electronically. Prior to providing the information needed to perform one's job or information generally available in the workplace, employees requiring accessible formats or communication supports will be requested to notify the HR department so that alternate arrangements may be made.
2. Upon receiving a request, the HR department will work with the employee and any individuals responsible for providing the information (for example the employee's manager, supervisor or team lead) to deliver a suitable accessible format or communication support. Prior to involving the employee's supervisor, manager or team lead, consent will be obtained from the employee.

<p><i>Information for Employees</i></p> <ol style="list-style-type: none"> 1. Communicate the company's policy on accommodating employees with disabilities to all staff members. 2. Ensure that all new hires are informed of the company's policy on accommodating employees with disabilities. 	Completed/Ongoing	01/01/16	HR
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HIROC's Action Plan

1. HIROC's Accommodation Policy has been developed. Communication will occur when changes

occur.

2. Provide all new hires with the Accommodation Policy in their new hire package. The policy addresses all of the means by which HIROC will support employees with disabilities, including accessible formats and communication supports as well as accessible performance management, career development and job change processes.
3. Ensure that all employees are informed of changes to the Accommodation Policy as they occur.. Delivery of information will adhere to HIROC's Accessible Information and Communication Supports Policy.

Processes to Accommodate Employees/Return to Work Process

- Create a process to develop accommodation plans and return to work plans for employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

Ongoing

01/01/16

HR

HIROC's Action Plan

- Assess IASR requirements and develop a template accommodation form and a return to work form that both address all applicable requirements. Use of these updated forms will ensure that all accommodation and RTW plans are properly recorded and retained on file. For consistency, the accommodation plan template will be used in conjunction with RTW processes.

Accessible Performance Management, Career Development and Job Changes

- Ensure the organization's performance management and career development opportunities account for the accessibility needs and plans of employees and that these processes are inclusive and barrier-free.

Ongoing

01/01/16

HR

HIROC's Action Plan

- HIROC will take into account the accessibility needs of employees with disabilities, as well as

individual accommodation plans: When using our performance management process in respect of employees with disabilities; when providing career development and advancement to our employees with disabilities; when redeploying employees with disabilities.

- In order to meet this obligation, we will review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR.

Redeployment

- Take into account the accessibility needs and accommodation plans of employees who are reassigned to an alternate department or position with the company as an alternative to a layoff.

Completed/Ongoing

01/01/16

HR

HIROC's Action Plan

- As part of the redeployment process, HIROC will incorporate the accessibility needs and accommodation plans of any employee that is being redeployed to an alternate position and/or department. The HR department will oversee the redeployment process; however, new and/or amended reporting hierarchies will be reviewed to determine who is to be involved with and informed of any accessibility plans and requirements.