

AODA Multi-Year Accessibility Plan 2011 – 2021

Litens has prepared this Multi-Year Accessibility Plan in accordance with the requirements of the *Accessibility for Ontarians with Disabilities Act* and Ontario Regulation 191/11 Integrated Accessibility Standard (“IASR”). The MYAP sets out Litens’s strategy for preventing and removing accessibility barriers and meeting the requirements of the IASR over the next several years. Litens, inclusive of all our facilities, is committed to meeting the accessibility needs of its stakeholders in a timely manner, and reviewing and updating the MYAP at least once every five years.

This document is available in alternative formats upon request. Please contact actionresponseline@litens.com.

Year	Customer Service Standard	Responsibility	Action Plan	Status		
				In Progress	Ongoing	Complete
2012 - 2013	<p>s. 3 Policies, practices, procedures</p> <ul style="list-style-type: none"> Establish policies, practices and procedures on providing goods or services to persons with disabilities according to requirements set out in regulation. Create document describing policies, procedures and practices; provide upon request in alternative format. 	HR/Health & Safety	<ul style="list-style-type: none"> Draft and distribute Customer Service policy update for Employee Handbook; draft AODA and CSS SOPs. Draft and distribute Customer Service Accessibility Plan. 			<p>X</p> <p>X</p>
2012 - 2013	<p>s. 3 (4)</p> <ul style="list-style-type: none"> Must communicate with a person with a disability in a manner that takes into account his/her disability. 	HR/Health & Safety	<ul style="list-style-type: none"> Respond to employees, customers and other stakeholders as required. 		X	
2012 - 2013	<p>s. 4 Use of service animals and support persons</p> <ul style="list-style-type: none"> Establish policies, practices and procedures around a person with a disability being accompanied by a 	HR/Health & Safety	<ul style="list-style-type: none"> Included in Customer Service policy update for Employee Handbook; draft AODA and CSS SOPs; included in Customer Service Accessibility Plan. 			X

	service animal or support person.					
2012 - 2013	<p>s. 5 Notice of temporary disruptions</p> <ul style="list-style-type: none"> • Provide public notice of disruption in facilities or services by posting on premises or on website. • Include in notice reason for disruption, anticipated duration, and description of alternatives, if available. • Create a document describing steps to be taken for temporary disruptions; provide upon request. 	<p>HR/Health & Safety</p> <p>Facilities Maintenance</p> <p>HR/Health & Safety</p>	<ul style="list-style-type: none"> • Commitment written into policies. • Advise service areas of requirement and follow-up as required. • Documented into policies. 			<p>X</p> <p>X</p> <p>X</p>
2012 - 2013	<p>s. 6 Training for staff</p> <ul style="list-style-type: none"> • Provide training to: <ul style="list-style-type: none"> ○ employees, agents, volunteers who deal with the public or others. ○ everyone who participates in developing the policies, practices and procedures governing providing goods or services to public or others. • Include training on specific topics set out in the regulation. • Provide training on ongoing basis to reflect any changes to policies, practices and procedures. • Create document describing training policy, summary of content and details of when provided. • Keep records of training provided, including dates and number trained. 	<p>HR/Health & Safety</p>	<ul style="list-style-type: none"> • Develop SharePoint database and training delivery program • Draft training slides; upload to training delivery format • Compile lists of customer facing employees throughout organization. • Distribute training program with instructions and deadlines for reporting. • Deliver training to all customer-facing employees. • Monitor training roll-out and audit completion records. • Follow-up to ensure training delivery completion and certification of completion in timely manner. 			<p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p> <p>X</p>

2012 - 2013	<p>s. 7 Feedback process</p> <ul style="list-style-type: none"> Establish process for receiving and responding to feedback; make information about process publicly available. Create document describing process; make available on request. 	HR/Health & Safety	<ul style="list-style-type: none"> Contact Company IT to establish email feedback address. Undertake test of email feedback process. Create and maintain database of any and all feedback received. Description of process included in policies and made publically available in binders at reception of all facilities. 			<p>X</p> <p>X</p> <p>X</p> <p>X</p>
2012 - 2013	<p>s. 8 Notice of availability of documents</p> <ul style="list-style-type: none"> Notify customers that the documents covered by this Regulation are available upon request by posting conspicuously on premises, website or other reasonable method. 	HR/Health & Safety	<ul style="list-style-type: none"> All policies and other material made publically available in binders at reception of all facilities. 			<p>X</p>
2012 - 2013	<p>s. 9 Format of documents</p> <ul style="list-style-type: none"> Alternate format of documents covered by this regulation must take into account person's disability. 	HR/Health & Safety	<ul style="list-style-type: none"> Respond to employees, customers and other stakeholders as required 			<p>X</p>

Year	Integrated Accessibility Standard	Responsibility	Action Plan	Status		
				In Progress	Ongoing	Complete
2013 - 2014	<p>s. 3 Establishment of Accessibility Policies</p> <ul style="list-style-type: none"> Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the IASR. 	HR/Health & Safety	<ul style="list-style-type: none"> Draft and distribute Integrated Standard Accessibility policy document for Employee Handbook. 			X
2013 - 2014	<p>s. 3(2)</p> <ul style="list-style-type: none"> Include a statement of organizational commitment to meeting accessibility needs. 	HR/Health & Safety	<ul style="list-style-type: none"> Draft written commitment statement and include it in MYAP and policy. 			X
2013 - 2014	<p>s. 3(3)</p> <ul style="list-style-type: none"> Prepare a written document describing policies and make it publicly available in an accessible format. 	HR/Health & Safety IS	<ul style="list-style-type: none"> Draft the written accessibility policy document(s). Coordinate with IS to post required document(s) on website in an accessible format. 			X X
2013 - 2014	<p>s. 4 Accessibility Plans</p> <ul style="list-style-type: none"> Establish, implement, maintain and document a Multi-year Accessibility Plan (MYAP); post online in an accessible format, and update it every five years. 	HR/Health & Safety/IS HR/Health & Safety HR/Health & Safety/IS HR/Health & Safety	<ul style="list-style-type: none"> Draft a MYAP and post it to the website. Complete review at least every five years. Amend MYAP and repost on website as necessary. Provide in an accessible format upon request. 			X X X

2013 - 2014	<p>s. 6(1) Self-Serving Kiosks</p> <ul style="list-style-type: none"> Incorporate accessibility features when designing, procuring or acquiring self-service kiosks <p>s. (2)</p> <ul style="list-style-type: none"> Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks 	HR/Health & Safety	<ul style="list-style-type: none"> Identify any self-service kiosks (currently none). 			X
2013 - 2015	<p>s. 7 Training</p> <ul style="list-style-type: none"> Provide training on the requirements of the accessibility standards referred to in IASR and on the <i>Human Rights Code</i> as they pertain to persons with disabilities to employees, volunteers, persons who participate in developing the organization's policies, persons who provide goods, services or facilities on behalf of the organization. 	HR/Health & Safety	<ul style="list-style-type: none"> Create online training materials and program. Provide training to all employees, etc., and new employees, etc. as part of orientation. Create and maintain online record of training completion. Record future changes in policy and update training accordingly. 		X	X X
2013 - 2015	<p>s. 7(2-4)</p> <ul style="list-style-type: none"> Training must be appropriate to the duties of the employee, etc. Employees, etc. must be trained as soon as practicable. Provide training in respect of any changes to the policies on an ongoing basis. 	HR/Health & Safety	<ul style="list-style-type: none"> Reviewing training and adjust as appropriate for various levels and duties of employees. Adjust training and re-train each time changes to policies take place. 		X X	
2015	s. 7(5)	HR/Health & Safety	<ul style="list-style-type: none"> Create and maintain online record of training completion. 		X	

	<ul style="list-style-type: none"> Keep a record of training, including dates and number of those trained. 		<ul style="list-style-type: none"> Update and record training statistics to be automatic and continuous through online system. 		X	
2015	<p>s. 11 Feedback</p> <ul style="list-style-type: none"> Ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. 	HR/Health & Safety	<ul style="list-style-type: none"> Respond to email inquiries or telephone calls from employees, customers and other stakeholders as required. Provide or arrange for accessible formats for giving and receiving feedback upon receiving a request. Consult and utilize alternative technologies and/or outside consultants as necessary. 		X X X	
2015	<p>s. 11(3)</p> <ul style="list-style-type: none"> Notify the public about the availability of accessible formats and communication supports. 	HR/Health & Safety	<ul style="list-style-type: none"> Include notification wherever feedback procedures are described. 		X	

2016	<p>s. 12 Accessible formats and communication reports</p> <ul style="list-style-type: none"> • Upon request, provide or arrange for accessible formats and communication supports for persons with disabilities. • Do so in consultation with the requesting person, in a timely manner, taking into account person's accessibility needs, at a cost no greater than the cost charged to other persons. • Notify the public about the availability of accessible formats and communication supports. 	HR/Health & Safety	<ul style="list-style-type: none"> • Respond to email inquiries or telephone calls from employees, customers and other stakeholders as required. • Provide or arrange for accessible formats for giving and receiving feedback upon receiving a request. • Consult and utilize alternative technologies and/or outside consultants as necessary. • Include notification wherever accessibilities procedures are described. 		<p>X</p> <p>X</p> <p>X</p> <p>X</p>	
2014	<p>s. 14 (4) 1. Accessible Websites and Web Content</p> <ul style="list-style-type: none"> • Ensure that new web content conforms to WCAG 2.0 Level A. 	HR/Health & Safety	<ul style="list-style-type: none"> • Identify all new content as of 2014 (none). 			X
2021	<p>s. 14 (4) 2. Accessible Websites and Web Content</p> <ul style="list-style-type: none"> • All web content must conform to WCAG 2.0 Level AA, subject to exceptions. 	HR/Health & Safety IS	<ul style="list-style-type: none"> • Assess current compliance status. • Re-write all new content not subject to exceptions to comply with WCAG 2.0 Level AA. • Continue to update existing content to WCAG level AA. 	X	X	X
2016	<p>s. 22 Recruitment, General</p>	HR/Health & Safety	<ul style="list-style-type: none"> • Review and revise any applicable HR policies/Handbook to explain 	X		

	<ul style="list-style-type: none"> Notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment processes. 		<ul style="list-style-type: none"> requirement and Company's commitment to compliance. Include an accessibility notification as part of all job-postings. 	X		
2016	<p>s. 23 Recruitment, assessment or selection process</p> <p>s. 23 (1)</p> <ul style="list-style-type: none"> During a recruitment process, 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>s. 23 (2)</p> <ul style="list-style-type: none"> If a selected applicant requests an accommodation, 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. 	HR/Health & Safety	<ul style="list-style-type: none"> Review and revise any applicable HR policies/Handbook to explain requirement and Company's commitment to compliance. Include an accessibility notification as part of all job-postings. Ensure that applicants with disabilities are properly accommodated as required. Consult with the applicant as required. Ensure enough time in the application process to receive, assess and implement an accommodation request. 	X X X X		
2016	<p>s. 24 Notice to successful applicants</p> <ul style="list-style-type: none"> When making offers of employment, notify the successful applicant of the policies for accommodating employees with disabilities. 	HR/Health & Safety	<ul style="list-style-type: none"> Revise offer of employment templates to include requisite accessibility/accommodation information. 	X		
2016	<p>s. 25 Informing employees of supports</p> <ul style="list-style-type: none"> Inform employees of policies used to support its employees with disabilities 	HR/Health & Safety	<ul style="list-style-type: none"> Continue to revise and re-issue Employee Handbook at all levels as necessary. Include AODA and disability 	X X		

	<p>including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <ul style="list-style-type: none"> • Provide this information to new employees as soon as practicable after they begin their employment. • Provide updated information to employees whenever there is a change to existing policies 		<p>policies in orientation package(s).</p> <ul style="list-style-type: none"> • Re-issue updated policies in Handbook and communicate in employee meetings as necessary. 	X		
2016	<p>s. 26 Accessible formats and communication supports for employees</p> <ul style="list-style-type: none"> • Upon request, provide or arrange for the provision of suitable accessible formats and communication supports for information needed to perform the employee's job and information that is generally available to employees in the workplace. • Consult with the employee making the request in determining the suitability of an accessible format or communication support 	HR/Health & Safety	<ul style="list-style-type: none"> • Provide all information that is generally available to employees in an accessible manner as required. • Continue with existing procedures for responding to accommodation/accessibility requests and determining the suitability of the request. • Respond to additional accessibility requests on a case by case basis as required. • Consult with requesting employees regarding suitability of accessibility as required. 		X	
2012	<p>s. 27 Workplace emergency response information</p> <ul style="list-style-type: none"> • If aware of need for accommodation, provide individualized workplace emergency response information (IWERI) to employees who have a disability, if the disability is such that the individualized information is necessary. 	HR/Health & Safety	<ul style="list-style-type: none"> • Continue to review existing and future accommodation needs and provide individualized information as necessary. 		X	

2012	<p>s. 27(2)</p> <ul style="list-style-type: none"> If an employee who receives individualized workplace emergency response information (IWERI) requires assistance and consents, provide the IWERI to the person designated by the employer to provide assistance to the employee. 	HR/Health & Safety	<ul style="list-style-type: none"> Record the consent of the person receiving IWERI and keep a record of all designated persons. Provide the IWERI to the designated persons as necessary. 		<p>X</p> <p>X</p>	
2012	<p>s. 27(3)</p> <ul style="list-style-type: none"> Provide the information required under Section 27 as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability. 	HR/Health & Safety	<ul style="list-style-type: none"> Record and track response times via email and determine reasonable implementation time. 		X	
2012	<p>s. 27(4)</p> <ul style="list-style-type: none"> Review the IWERI whenever (i) an employee moves to a different location; (ii) the employee's overall needs change; or (iii) the employer reviews general emergency response policy. 	HR/Health & Safety	<ul style="list-style-type: none"> Employees to notify management in a timely manner when their needs change; respond accordingly. Review all affected IWERIs when the Company's general emergency response policy changes. 		<p>X</p> <p>X</p>	
2016	<p>s. 28 Documented individual accommodation plans</p> <ul style="list-style-type: none"> Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. 	HR/Health & Safety	<ul style="list-style-type: none"> Refine existing written process for responding to accommodation/accessibility requests and developing accommodation plans in accordance with the elements set out in ss. 28(2) and (3). 			X

2016	<p>s. 29 Return to work process</p> <ul style="list-style-type: none"> • Develop and have in place a documented return to work process for employees who have been absent from work due to a disability and require accommodations to return to work. • The process shall outline the steps the employer will take to facilitate the return to work of employees who were absent due to disability, utilizing the individual accommodation plans referred to in s. 28. 	HR/Health & Safety	<ul style="list-style-type: none"> • Refine existing written process for employees who have been absent from work due to disability and require accommodation to return to work. • Refine existing written process for responding to accommodation/accessibility requests and developing accommodation plans in accordance with the elements set out in ss. 28(2) and (3). 		<p style="text-align: center;">X</p> <p style="text-align: center;">X</p>	
2016	<p>s. 30 Performance Management</p> <ul style="list-style-type: none"> • Take into account the accessibility needs of employees with disabilities when providing performance management. 	HR	<ul style="list-style-type: none"> • Continue using established performance management process; assess accommodation needs on individual basis. 		X	
2016	<p>s. 31. Career Development and Advancement</p> <ul style="list-style-type: none"> • Take into account the accessibility needs of employees with disabilities when using career development and advancement. 	HR	<ul style="list-style-type: none"> • Continue using established advancement process; assess accommodation needs on individual basis. 		X	
Various	<ul style="list-style-type: none"> • File Accessibility reports as required. 	HR/Health & Safety	<ul style="list-style-type: none"> • Review filing requirements on an annual basis; file as required. 		X	