

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – BROCK SOLUTIONS INC. Multi-Year 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. | Policy created, sent for approval and posted. | COMPLETE | January 1, 2014 for over 50 ees |
| 4 | Accessibility Plans | <p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p> | <p>Plan is drafted.</p> <p>Post on website (if there is a website) – IT involvement</p> <p>Track and review annually</p> | COMPLETE | January 1, 2014 for over 50 ees |

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| 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. | NOT APPLICABLE | | January 1, 2014 for over 50 ees January 1, 2015 For under 50 ees |
| 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. | Training presentation provided as part of new employee orientation. Identify: Management training Employee training Volunteer training Outside providers (as needed) Select training type, conduct training. | COMPLETE | January 1, 2014 for over 50 ees January 1, 2016 For under 50 ees |

PART II – Information and Communications Standards

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 11 | Feedback | 11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request. | No action for BROCK – already done. Feedback can be received via phone, email, in person or a written letter. If there is a feedback process with employees or customers (engagement survey, etc.) this comes into play. | COMPLETE | January 1, 2015 for over 50 ees |
| 12 | Accessible Formats & Communication Supports | 12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person’s accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. | Determine what formats may be requested/needed and prepare in advance if possible. Build into training so people consider this and maintain costs. | IN PROGRESS | January 1, 2016 for over 50 ees |
| 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. | Build into training. Communicate with staff the requirement and our process. | IN PROGRESS | January 1, 2016 |
| 12 | | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Post sign in lobby. Post on website (if there is one), IT involvement. | IN PROGRESS | January 1, 2016 |

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| 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. | | 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. | <p>Verify BROCK is in compliance.</p> <p>IT involvement if required. IT training required.</p> <p>Review what changes need to take place to ensure compliance with 2021 requirement deadline.</p> | COMPLETE | <p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded). |

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| 15 | Educational & Training Resources & Materials | <p>15(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <ol style="list-style-type: none"> 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, <ol style="list-style-type: none"> i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format. 2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities. | NOT APPLICABLE | | January 1, 2013 |
| 16 | Training to Educators | <p>16(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.</p> | NOT APPLICABLE | | January 1, 2013 |

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| | | (2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. | NOT APPLICABLE. | | January 1, 2013 |
| 17 | Producers of Educational or Training Material | 17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions. | NOT APPLICABLE. | | January 1, 2015 For accessible or conversion ready versions of textbooks |
| | | (2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions. | NOT APPLICABLE. | | January 1, 2020 For accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources. |
| 18 | Libraries of educational & training institutions | 18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. (2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1). | NOT APPLICABLE. | | January 1, 2015 For print-based resources or materials January 1, 2020 For digital or multimedia resources or materials |

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PART III – Employment Standard

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 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. | Notice in future job ads: We are committed to providing accommodations to persons with disabilities. If you require accommodation we will work with you to meet needs where possible. | COMPLETE | January 1, 2016 |
| 23 | Recruitment, Assessment or Selection Process | 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. (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. | Comply with the upcoming deadline to notify candidates at the time of booking interviews that accommodations are available if required. Comply with the upcoming deadline by developing a communication plan to ask candidates what their needs are and how best to accommodate. | IN PROGRESS | 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 accommodating employees with disabilities. | Create this statement in our offer of employment by the upcoming deadline. | IN PROGRESS | January 1, 2016 |
| 25 | Informing Employees of Supports | 25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of | Training, posters on bulletin board to notify employees of policies. | IN PROGRESS | January 1, 2016 |

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| | | job accommodations that take into account an employee's accessibility needs due to disability. | New employees receive this in new employee orientation. | | |
| 25 | | 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. | During new employee orientation | 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 Section 25.1 above | COMPLETE | 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> | Review job descriptions and any standard operation procedures, postings on bulletin board – to provide accessible formats as needed. | IN PROGRESS | 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. | Review what we CAN do from an organizational perspective (ie. Not offering brail, but offer large print, scalable PDF, etc.) | IN PROGRESS | January 1, 2016 |

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| 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. | Have employees complete an assessment form and address employee's needs as identified. OR Assess as needed | COMPLETE | January 1, 2012 Over and under 50 employees |
| 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. | Provide our workplace emergency response information to all person(s) designated to assist specific employee(s) | COMPLETE | January 1, 2012 Over and under 50 employees |
| 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. | | COMPLETE | January 1, 2012 Over and under 50 employees |
| 27 | | (4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. | | COMPLETE | January 1, 2012 Over and under 50 employees |

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| 28 | Documented Individual Accommodation Plans | 28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. | Draft an outline to document an individualized accommodation plan (with affected employee's input), send for approval, and maintain confidentiality. | IN PROGRESS | 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"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 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. | | IN PROGRESS | January 1, 2016 |

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| | | <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> | | | |
| 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 current return to work process and update accordingly.</p> <p>Create a clear outline showing how Brock will facilitate the return to work of employees, using individual accommodation plans if applicable.</p> | IN PROGRESS | January 1, 2016 |

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| 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> | | IN PROGRESS | January 1, 2016 |
| 29 | | <p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p> | | IN PROGRESS | January 1, 2016 |
| 30 | Performance Management | <p>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.</p> | <p>Review how we conduct performance reviews and how best to accommodate needs of employee.</p> | IN PROGRESS | January 1, 2016 |
| 31 | Career Development & Advancement | <p>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.</p> | <p>Review how we identify career development/advancement needs and how best to accommodate needs of employee.</p> | IN PROGRESS | January 1, 2016 |

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| 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 how we communicate redeployment and how best to accommodate needs of employee. | IN PROGRESS | January 1, 2016 |
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