



Accessibility Plan and Policies for Liberty Spring (Toronto)

Introduction

Liberty Spring – Toronto (LST) fully supports the inclusion of persons with disabilities in f its operations. In accordance with the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”), Ontario Regulation 191/11 Integrated Accessibility Standard (ISAR), and Human Rights Code. LST strives to conduct its business in a way that is accessible, inclusive and responsive to the needs of persons with disabilities.

Scope

This Multi-Year Accessibility Plan outlines the policies and actions that Liberty Spring (Toronto) will put in place to improve opportunities for people with disabilities.

Statement of Commitment

LST 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 people 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.

Accessibility Policy & Commitment Statement

This policy is posted on Liberty Spring website in an accessible format. Upon request, the company will provide a copy of this document in an alternative accessible format.

Multi-Year Accessibility Plan

LST has developed and will maintain a Multi-Year Accessibility Plan that sets out LST strategy for preventing and removing accessibility barriers from our workplaces and meet its requirements of the IASR.

The plan will be reviewed and updated at least once every five years.

The plan is posted on LST website in an accessible format. Upon request, LST will provide a copy of the plan in an alternative accessible format

Self-service Kiosks

If LST procures or acquires self-service kiosks in the future, we will have regard to the accessibility for persons with disabilities and ensure that the kiosks incorporate appropriate accessibility features.

Training

LST will provide training to employees and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, and other staff members.

We will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws by January 1, 2015:

- Employees will be trained when changes are made to the accessibility policy as soon as practicable
- Keep a record of the dates of training and the individuals who received the training.

Information and Communications Feedback

LST is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

LST will continue to ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports upon request.

Feedback, Accessible formats and Communication supports

LST will take the following steps to make sure existing feedback processes are accessible to people with disabilities upon request by January 1, 2015 and make sure all publicly available information is made accessible upon request by January 1, 2016.

- Ensure feedback processes are accessible to person with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. The organization will notify the public about the availability of accessible formats and communication supports.
- Except as otherwise provided for under the IASR, provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.
- Consult with the person making the request in determining the suitability of an accessible format or communication support.
- Notify the public about the availability of accessible formats and communication supports with respect to its feedback processes on LST website.

Accessible websites and web content

LST will ensure that its websites, including web content on such site, conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, except where meeting the requirement(s) is not practicable.

Employment

LST is committed to fair and accessible employment practices and it is proud to have a diverse workforce, with a safe, inclusive and accessible work environment. The Company's policies and practices are safeguarding that the workplace is free from discrimination and harassment.

Recruitment, Assessment or Selection

We will take the following steps to notify the public and staff that, when requested, LST will accommodate people with disabilities during the recruitment and assessment processes and when people, are hired by January 1, 2016

- Review and update existing recruitment, policies and procedures and processes.
- Specify that accommodation is available for applicants with disabilities on the website and on job postings
- In our recruitment processes, LST will advise employees and the public about the availability of accommodation for applicants with disabilities
- Inform applicants about the availability of accommodations: when called for an interview, during the selection process, at the time of the job offer and as soon as practicable after the new employee begins – specifically at orientation
- If selected applicant requests accommodation, consult with the applicant and arrange for provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to a disability

Notice to Successful Applicants

When making offers of employment, LST will notify successful applicants of our policies for accommodating employees with disabilities.

Informing Employees of Supports

LST 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 Emergency Information

WE are committed to providing the customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

Where an employee who receives individualized workplace emergency response information requires assistance, LST will designate a person to provide assistance and, with the employee's consent, LST will provide the workplace emergency response information to such person.

LST will review individualized workplace emergency response information, at minimum, whenever:

- The employee moves to a different location within LST;
- The employee's overall accommodation needs or plans are reviewed; or

- LST reviews its general emergency response policies.

Documented Individual Accommodation Plans / Return to Work Process

Liberty Spring (Toronto) will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability by January 1, 2016.

- Create a written process for the development of documented individual accommodation plans and return-to-work plans for employees with disabilities.
- Include in the process and plans all of the required elements in accordance with the provisions of the IASR
- The plans will include individualized workplace emergency response information (where required and in accordance with the Workplace Emergency Response Information Standard).

Performance Management, Career Development and Redeployment Process

We will take the following steps to ensure the accessibility needs of employees with disabilities needs are taken into account if Liberty Spring (Toronto) is using performance management, career development and redeployment processes:

- Review and update existing performance management policies, practices to ensure compliance with IASR
- Take the accessibility needs of employees with disabilities and, as applicable, individual accommodation plans, into account, as part of performance management processes when assessing performance, or providing career development and advancement opportunities and considering redeployment.

Design of Public Spaces

We will incorporate accessibility requirements under the IASR when building or redeveloping public space identified under Accessibility Standard for the Design of Public Spaces.

Service Disruptions

In the event of a service disruption, we will notify the public of the service disruption and alternatives available.

For more information

For more information on this accessibility plan, please contact Human Resources at:

- Phone: 416-675-9072 Ext. Ruqaiya Farhat
- Email: Ruqaiya.Farhat@libertyspring.com



AODA Multi-Year Accessibility Plan 2012 – 2022

LST 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 Multi-Year Accessibility Plan sets out LST’s strategy for preventing and removing accessibility barriers and meeting the requirements of the IASR over the next several years.

LST, is committed to meeting the accessibility needs of its stakeholders in a timely manner, and reviewing and updating the Accessibility Plan at least once every five years.

This document is available upon request. Please contact Human Resources at (416) 675-9072

Customer Service Standard	Responsibility	Action Plan	STATUS		
			In progress	Ongoing	Complete
s. 3 Policies, practices procedures	HR/EHS		In progress	Ongoing	Complete
-Establish policies, practices, 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/EHS	Included in employee handbook			X
s. 3 Establishment of Accessibility Policies -Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the IASR	HR/EHS	Distribute Integrated Standard Accessibility policy document for employee handbook			X
s. 3(2) Include a statement of organizational commitment to meeting accessibility needs	HR/EHS	-Written commitment statement in employee handbook			
s. 3(3) Prepare a written document describing policies and make it publicly available in an accessible format		Written accessibility policy document(s) Posted on HR Board in the Cafeteria			
S 3.4 Must communicate with a person with a disability in a manner that takes into account his/her disability	HR/EHS	Respond to employees, customers & other stakeholders as required			X
s. 4 Use of service animals and support persons -Establish policies, practices and procedures around a person with a disability being accompanied by a service animal or support person	HR/EHS	Included in employee Handbook			X
s. 4 Accessibility Plans -Establish, implement, maintain and document a Multi-year Accessibility Plan. Provide the plan in an accessible format upon request and review and update the accessibility plan once every 5 years.		Next Review, Jan 1, 2025 Multi-year accessibility plan: Accessibility of Ontarians with disability Act, 2005 Contact HR @ 416-675-9072		x	
s. 5 Notice of temporary disruptions -Provide public notice of disruption in facility by posting on premises -Include a 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.	HR/EHS Maintenance HR/EHS				X X X
s. 6 Training for staff >Provide training to: - Employees, agents, volunteers who deal with the public or others.	HR/EHS	-Develop and deliver training program			X X

<ul style="list-style-type: none"> - 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 		<ul style="list-style-type: none"> -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 roll-out and audit completion records - Follow-up to ensure training delivery completion and certification of completion in timely manner 			<ul style="list-style-type: none"> X X X X X
<p>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/EHS	<ul style="list-style-type: none"> -Create and maintain a Database of any and all feedback received -Description of process included in policies and made publically available in binders at reception 		<ul style="list-style-type: none"> X X 	
<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/EHS	All policies and other material made publically available upon request		x	
<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/EHS	Respond to employees, customers and other stakeholders as required		x	
<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 –Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks</p>	HR/EHS	Identify any self-service kiosks (Currently none).			x
<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 Human Rights Code as they pertain to person 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/EHS	<ul style="list-style-type: none"> -Provide training to all employees and new employees etc. as part of the orientation -Maintain record of training completion. -Record future changes in policy and update training accordingly 		<ul style="list-style-type: none"> X X X 	
<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/EHS	<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 		<ul style="list-style-type: none"> X X 	
<p>s. 7(5)</p> <p>Keep a record of training, including dates and number of those trained</p>	HR/EHS	<ul style="list-style-type: none"> Create and maintain a record of training completion Update and record training statistics 			<ul style="list-style-type: none"> X X

<p>s. 25 Informing employees of supports</p> <p>-Inform employees of 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.</p> <p>-Provide this information to new employees as soon as practicable after they begin their employment.</p> <p>-Provide updated information to employees whenever there is a change to existing policies</p>	HR/EHS	<p>-Continue to revise and re-issue Employee Handbook at all levels as necessary</p> <p>-Include AODA and disability policies in orientation package</p> <p>-Re-issue updated policies in Handbook and communicate in employee meetings as necessary.</p>		<p>X</p> <p>X</p> <p>X</p>	
<p>s. 26 Accessible formats and communication supports for employees</p> <p>-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</p> <p>-Consult with the employee making the request in determining the suitability of an accessible format or communication support</p>	HR/EHS	<p>-Provide all information that is accessible to employees in an accessible manner as required</p> <p>-Continue with existing procedures for responding to accommodation / accessibility requests and determining the suitability of the request</p> <p>-Respond to additional accessibility requests on a case by case basis as required</p> <p>-Consult with requesting employees regarding suitability of accessibility as required</p>	<p>X</p> <p>X</p> <p>X</p> <p>X</p>		
<p>s. 27 Workplace emergency response information</p> <p>If aware of need for accommodation, provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary</p>	HR/EHS	<p>Continue to review existing and future accommodation needs and provide individualized information as necessary</p>	<p>X</p>		
<p>s. 27(2)</p> <p>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</p>	HR/EHS	<p>-Record the consent of the person receiving the IWERI and keep a record of all designated persons</p> <p>-Provide the IWERI to the designated persons as necessary</p>	<p>X</p>		
<p>s. 27(3)</p> <p>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</p>	HR/EHS	<p>Record and track response times via email and determine reasonable implementation time</p>	<p>X</p>		
<p>s. 27(4)</p> <p>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</p>	HR/EHS	<p>-Employees to notify management in a timely manner when their needs change; respond accordingly</p> <p>-Review all affected IWERIs when the Company's general emergency response policy changes</p>	<p>X</p>		<p>X</p>
<p>s. 28 Documented individual accommodation plans</p> <p>Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities</p>	HR/EHS	<p>Refine existing written process for responding to accommodation / accessibility request and developing accommodation plans in accordance with the elements set out in ss. 28(2) and (3).</p>			<p>X</p>
<p>s.29 Return to work process</p> <p>-Develop and have in place a documented return to work process (RTW) for employees who have been absent from work due to a disability and require accommodation to return to work</p>	HR/EHS	<p>-Refine existing written process for employees who have been absent from work due to disability and require accommodation to RTW.</p>			<p>X</p>

-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		-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)(3)			X
s. 30 Performance Management Take into account the accessibility needs of employees with disabilities when providing performance management	HR	Continue using established performance management process; assess accommodation needs on individual basis		X	
s. 31 Career Development and Advancement Take into account the accessibility needs of employees with disabilities when using career development and advancement	HR	Continue using established advancement process; assess accommodation needs on individual basis		X	
File Accessibility reports as required	HR/EHS	Review filing requirements annually; file as required		X	

UPDATED

Dec-2022

Dec-2017

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