

SECRET LOCATION

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – 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.	Circulated to staff. Utilised during online training.	Complete	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, <ul style="list-style-type: none"> 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; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years. 	HR will this plan annually.	Ongoing	January 1, 2014
7	Training	7.(1) Every obligated organization shall ensure			January 1, 2015

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		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.	Online training was administered via Skillsoft to each person in the company. Additional training sessions have been purchased for any new hires in 2015. Secret Location has now included this training in the company's onboarding experience for new hires in 2015		Ongoing
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PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
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.	Explore alternative formats, i.e. large print, softcopy vs hardcopy, verbal. All request for additional communication supports will be dealt with by the HR department at Secret Location. A request for additional communication support will be met within 48 hours.	Ongoing	January 1, 2015
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	Procedure established. HR department will deal with all requests.	Ongoing	January 1, 2016

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		<p>disabilities,</p> <p>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p>	<p>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request. i.e. large print, PDF, verbal, electronic</p> <p>Ensure these formats and supports can be provided in a timely manner (ex. Same time, where possible; 48 hours)</p> <p>We do not charge for providing accessible information</p>		
12		<p>12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>Communicate to staff and management this requirement - procedure has been circulated to SL staff.</p> <p>Online training was provided to reiterate this policy.</p> <p>Develop protocol for situations where a suitable agreement cannot be made</p>	Ongoing	January 1, 2016
12		<p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Policy will be posted on the Secret Location's website advising clients that we will provide accessible formats of communication.</p>	Ongoing	January 1, 2016
14	Accessible Websites & Web Content	<p>14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the</p>	<p>Committee has met to review policy pertaining to websites.</p>	Ongoing	After January 1, 2014 New internet

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		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.	Working to ensure that all new website builds will conform to these guidelines.		websites and web content on those sites must conform with WCAG 2.0 Level A. January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <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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PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
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.	Secret Location will include messaging in all new job postings reiterating that we are committed to providing accommodations for persons with	Ongoing	January 1, 2016

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			disabilities. And if anyone requires accommodation, we will work with them to meet their needs.		
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.	We will notify applicants – via telephone or email. Interviewers will identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork and will work with candidate regarding accommodation requests.	Ongoing	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.	All job offers will inform successful candidates of our policies for accommodating employees with disabilities.	Ongoing	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 job accommodations that take into account an employee's accessibility needs due to disability.	Employees will be informed through policy circulation and training.	Ongoing	January 1, 2016
25		25.(2) Employers shall provide the information	Employees will be informed as part of	Ongoing	January 1, 2016

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		required under this section to new employees as soon as practicable after they begin their employment.	the onboarding process.		
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.	Updated policies will be circulated to employees.	Ongoing	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	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, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.	Investigate the types of communication we can offer in the event that an employee needs additional communication support. Looks at our current communications forms and identify barriers of communication that may be in place. Ensure managers are aware of the requirement to produce information in an accessible format.	Ongoing	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.	Employees will be consulted on accessible formats and communication supports. Communication supports that may be available are: large print, accessible PDFs, plain language versions or closed captioning, electronic version	Ongoing	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.	HR sent a companywide email notifying employees that the company will provide an individualized response plan. Individual Employee Response Information Form has been created to assist with any requests.	Ongoing	January 1, 2012
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.	Part of process with employee's consent	Ongoing	January 1, 2012
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.	Information will be provided to employees as soon as the need for accommodation has become known.	Ongoing	January 1, 2012
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	Individualized workplace response information will be reviewed when any change occurs that impacts the employee with the disability.	Ongoing	January 1, 2012

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		(c) when the employer reviews its general emergency response policies.			
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.	An individualized plan template has been created.	Ongoing	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 	Guidelines have been created for the accommodation process to ensure that all these elements are adhered to.	Ongoing	January 1, 2016

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		<p>represented by a bargaining agent, in the development of the accommodation plan.</p> <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>	Guidelines have been created for the return to work process	drafted	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>	<p>Job Task Analysis Form has been created and is being reviewed.</p>	<p>drafted</p>	<p>January 1, 2016</p>
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>	<p>The process developed under Section 29 (1) does not override any other return to work process created by or under any other statute.</p>		<p>January 1, 2016</p>
30	<p>Performance Management</p>	<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>Currently reviewing Secret Location’s performance management process. HR will identify any barriers for persons with a disability. The company is committed to creating individual accommodation for anyone who needs additional communication support.</p>		<p>January 1, 2016</p>
31	<p>Career Development & Advancement</p>	<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 current Secret Location process. Need to keep individual accommodation plan in mind</p>		<p>January 1, 2016</p>

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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 your current process Need to keep individual accommodation plan in mind		January 1, 2016
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