

WHITE OAKS CONFERENCE RESORT & SPA

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)

Multi-year plan for the Integrated Accessibility Standards

Introduction

In 2005, the Ontario Government passed the Accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be an accessible province by 2025. To help public, private and not-for-profit organizations identify, prevent and remove barriers to accessibility, the AODA sets out specific accessibility standards in five areas: Customer Service, Information and Communications, Employment, Transportation, and the Built Environment.

As set forth in the Integrated Accessibility Standards, Regulation 191/11, this Accessibility Plan has been prepared to address issues and barriers preventing persons with disabilities. This is a multi-year Plan that outlines how we intend to identify, prevent and remove barriers to accessibility, as well as our strategy in meeting the various requirements under the AODA legislation. The Plan will be reviewed and updated periodically as new legislation continues to come into effect, and at least every 5 years.

Statement of Commitment

White Oaks Conference Resort & Spa is committed to treating all people in a way that allows them to maintain dignity and independence. *White Oaks Conference Resort & Spa operates and provides its services in accordance with the provisions of the Accessibility for Ontarians with Disabilities Act and its associated Regulations, and maintains the goal of creating a barrier-free learning and working environment which will foster employment success. We support the intent of the AODA, and are committed to meeting all the requirements of the Accessibility Standards.*

TITLE	AODA STANDARD	ACTION PLAN	STATUS	NOTES
PART 1 - GENERAL				

Establishment of Accessibility Policies	<p>3. (1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in the Regulation.</p> <p>3.(2) organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.</p> <p>3.(3) organizations shall, (a) prepare one or more written documents describing its policies; and (b) make the documents publicly available, and shall provide them in an accessible format upon request.</p>	<p>Policy written, approved and posted on the White Oaks website</p> <p>statement of commitment will be included with the multi-year plan.</p> <p>Policy is posted on website and is available at the front desk and switchboard.</p>	<p>Complete – ongoing obligation</p> <p>Completed</p> <p>Completed</p>	<p>January 2014</p> <p>December 2014</p> <p>January 2014</p>
Accessibility Plans	<p>4.(1) large organizations shall, (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 the 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.</p>	<p>Multi-year plan</p> <p>Multiyear plan posted on the WO website.</p> <p>Review policy every 5 years</p>	<p>Updated 2021 - Ongoing</p> <p>Completed – ongoing obligation.</p> <p>Review every 5 years.</p>	<p>November 2014</p> <p>June 2021 Next review date December 1, 2025</p>
Self-Serve Kiosks	<p>6. (2) Large organizations and small organizations shall have regard to the accessibility for person with disability when designing, procuring or acquiring self-service kiosks.</p>	<p>White Oaks will ensure compliance with all kiosks such as bank machines.</p>	<p>Completed/ ongoing compliance</p>	<p>October 2014</p>
Training	<p>7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and</p>	<p>Criteria was incorporated into the Company’s General Orientation Program in 2012. All new team</p>	<p>Complete – ongoing obligation.</p>	<p>January 1, 2015</p>

	<p>on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>members are required to attend General Orientation and sign off on the AODA policy.</p> <p>Online training certificates are completed by each team member. General Requirements, Information/communication, Employment standards, Design of public spaces, Customer service Standard, Transportation and Working with the code.</p> <p>Written records of training are maintained and all other training that is conducted in the Human Resources department.</p>		
PART II - INFORMATION AND COMMUNICATIONS STANDARDS				
Feedback	<p>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 the provision of accessible formats and communications supports, upon request.</p> <p>11.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured. '</p> <p>Determine what accessible formats and communication supports we will provide upon request.</p> <p>Ensure staff and management are aware of the need to accommodate upon request. Requests to be directed to CEO & Human Resources.</p> <p>Part of ongoing training.</p> <p>White Oaks Conference Resort & Spa</p>	<p>Ongoing review</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2015 Next review date is December 15, 2025</p>

		<p>will take the following steps to make ensure existing feedback processes are accessible to people with disabilities upon request.</p> <ul style="list-style-type: none"> - Customer feedback processes allow for multiple types of communication such as email, telephone, or regular mail (available at the front desk). 		
Accessible formats and communication supports	<p>12. (1) 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.</p> <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>12.(3) Every organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</p> <p>Ensure these formats and supports can be provided in a timely manner (ex. Same time, day, 24 hours)</p> <p>Communicate to staff and management that no additional charge is required</p>	Completed and ongoing obligation	January 1, 2016
Emergency procedure, plans or public safety information	<p>13. (1) In addition to its obligations under section 12, if an 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.</p>	<p>White Oaks will make available upon request to its guests, customers, and clients emergency documents in an accessible format.</p> <p>We will also provide team members with disabilities with individualized emergency response information when necessary.</p> <p>White Oaks will continue to document workplace emergency plans and revise and review existing</p>	Complete – ongoing obligation.	January 1, 2012

		emergency plans for team members requiring assistance with accessibility in the event of an emergency.		
Accessible websites and web content	<p>14. (2) 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> <p>14.(4) Designated organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <ol style="list-style-type: none"> 1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A. 2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ol style="list-style-type: none"> i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). 	<p>Attend workshop on Accessible Websites (IS / Communications)</p> <p>Sourcing vendors and pricing to develop accessible website (new website).</p> <p>Continuously review WCAG guidelines to be informed of changes and updates</p>	<p>Ongoing obligation</p> <p>Ongoing obligation</p> <p>Ongoing obligation</p>	<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, success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Prerecorded).</p>
PART III – EMPLOYMENT STANDARDS				
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.	Will include in job postings and all advertisements that workplace accommodations will be made	Complete – ongoing obligation	January 1, 2016

		available to those who are disabled		
Recruitment, assessment or selection process	<p>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.</p> <p>23.(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.</p>	<p>Interviews will offer accommodation supports to candidates being interviewed and will provide such accommodation support upon request</p> <p>Accommodation supports will be mutually agreed upon</p>	Complete – ongoing obligation	January 1, 2016
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.	Written offers of employment will include our policy on accommodating employees with disabilities. Draft language to be used	Ongoing obligation	January 1, 2016
Informing employees of supports	<p>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.</p> <p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>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.</p>	Will include information in Company Orientation for new employees	<p>Ongoing obligation</p> <p>Ongoing – updates are noted in the multiyear plan</p>	January 1, 2016
Accessible formats and 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	White Oaks will upon request, provide or arrange for provisions of accessible formats and communication supports to persons	Ongoing obligation	January 1, 2016

	<p>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.</p> <p>26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	with disability in a timely manner, taking into account the person's accessibility needs.		
Workplace emergency response information	<p>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.</p> <p>(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.</p> <p>(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.</p> <p>(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.</p> <p>(5) Every employer shall meet the requirements of this section by January 1, 2012.</p>	White Oaks will create an individual emergency evaluation plan for any team member who discloses they require an accommodation.	Ongoing obligation	January 1, 2012
Documented	28. (1) Employers shall develop and have in place a			

<p>individual accommodation plans</p>	<p>written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>(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 assist the employer in determining if accommodation can be achieved and, if so, 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. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 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>(3) Individual accommodation plans shall,</p> <ol style="list-style-type: none"> (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; 	<p>Develop expanded process.</p> <p>Include: Overview Accommodation Process; Individual Accommodation Plan</p> <p>Review current process to ensure it meets requirements, including review of Job Task Analysis.</p>	<p>Complete and ongoing</p>	<p>January 1, 2016</p>
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Return to work process	<p>(b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided.</p> <p>29. (1) Every employer (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 (b) shall document the process. (2) The return to work process shall, (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 (b) use documented individual accommodation plans, as described in section 28, as part of the process. (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>Develop a return to work process and communicate to all employees.</p> <p>Method of communication to be determined.</p> <p>Review current process to ensure it meets requirements.</p> <p>Updated Accommodation & Return to Work policy.</p> <p>Consider adding this to Team member Handbook</p>	Complete and ongoing	
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>White Oaks will continue to take into account the accessibility needs of team members with disability, as well as individual accommodation plans, when using its performance management process.</p>	Ongoing obligation	January 1, 2016
Career development and 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>White Oaks will take into account the accessibility needs of disabled team members and individual accommodation plans when providing career development and advancement opportunities</p>	Ongoing obligation	January 1, 2016

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.	White Oaks will take into account the accessibility needs of disabled team members and individual accommodation plans when redeploying a team member.	Ongoing obligation	January 1, 2016
DESIGN OF PUBLIC SPACES				
New buildings and major renovations	<p>Part IV: Design of Public Spaces Standard</p> <p>80.1-80.44 Public Spaces</p> <p>White Oaks will focus on removing barriers in our buildings and public spaces.</p> <p>Buildings – As of January 1, 2015, new construction and renovations will reflect updated accessibility requirements as outlined by Ontario’s Building Code. Public Spaces – Will be redesigned to meet accessibility standard where there is new construction and major changes to existing facilities, including:</p> <ul style="list-style-type: none"> • Recreational trails/beach access routes • Outdoor public eating areas • Outdoor play spaces • Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals • Accessible parking • Service-related elements like service counters, fixed queuing lines and waiting areas. • Maintenance and restoration of public spaces. 	White Oaks will comply with the requirements of the Amendments to Ontario’s Building Code	Ongoing obligation	January 1, 2015
Information and Communication Standards	<p>Part II: 14. Accessible Websites and Web Content</p> <ul style="list-style-type: none"> • Make websites and web content conform with the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG)2.0 – Level AA (excluding success criteria 1.2.4 and 1.25 as outlined in the Act) 	<ul style="list-style-type: none"> • Implement requirements to conform with WCAG 2.0-Level AA 	Ongoing obligation	June 2021
Resources	https://www.ontario.ca/laws/regulation/110191#BK118			

