



BRIGHOLME INTERIORS GROUP'S MULTI-YEAR ACCESSIBILITY PLAN

2014 - 2021

STATEMENT OF COMMITMENT:

*Brigholme Interiors Group is committed to meeting the accessibility needs of persons with disabilities in an effective and timely manner by preventing and removing barriers for persons with disabilities in accordance with the *Integrated Accessibility Standards Regulation (IASR)*. *Brigholme Interiors Group's* goal is to foster an inclusive organizational culture that is guided by the principles and requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*, the *IASR* and the *Ontario Human Rights Code ("Code")*.*

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Part I – GENERAL REQUIREMENTS

Section: 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.

Action: *Brigholme Interiors Group* has developed all policies and procedures necessary to comply with the requirements set forth by AODA due Jan 1, 2014.

Status: Complete

Compliance Date: January 1, 2014

Section: 4

Accessibility Plans

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 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.

Action: Accessibility plan completed. HR and management to identify barriers in the workplace on an ongoing basis. HR will review the plan periodically and make changes as needed.

Status: Ongoing

Compliance Date: January 1, 2014

Section: 6

Self Service 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.

Action:

Status: Not Applicable

Compliance Date: January 1, 2014

Section: 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.

Action: *Brigholme Interiors Group* has trained all applicable parties necessary to fulfil the requirements set forth in this regulation.

Status: Ongoing – training to be provided to new hires as needed

Compliance Date: January 1, 2015

PART II – Information and Communications Standards

Section: 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.

Action: *Brigholme Interiors Group* will review all feedback processes across the company. Ensure all staff are aware of the need to accommodate upon request and how to handle said requests. This will be integrated into the scheduled training on the Integrated Accessibility Standard.

Status: Ongoing

Compliance Date: January 1, 2015

Section: 12

Accessible Formats and Communication Support

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.

12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.

Action: *Brigholme Interiors Group* will determine what accessible formats & Communication supports will be provided to persons with disabilities upon request (within 24 hours, if not immediately). Potential options to be finalized include: adding a statement in an email signature about format accommodation, ensuring that this is referenced in Company offer letters etc. Information will be available at our reception area and on our website.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 13

Emergency Procedures, Plans or Public Safety Information

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.

Action: *Brigholme Interiors Group* will post emergency procedures, plans or safety information in an area where it is available to the public.

Status: Complete

Compliance Date: January 1, 2012

Section: 14

Accessible Websites and 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.

Action: Any new content or changes made to the *Brigholme Interiors Group's* website in 2014 conforms to the WCAG 2.0 Level A Standards. Moving forward, all content in the years to come will meet the Level A standards. By 2021, using our web developer's assistance, we will ensure that the website conforms to the WCAG 2.0 Level AA Standards.

Status: Ongoing

Compliance Date: January 1, 2014 - New internet websites and web content on those sites must conform with WCAG 2.0 Level A by January 14, 2014

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 (Pre-recorded)

Section: 15

Educational and Training Resources and Materials

15 (1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:

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,
 - 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.

Action:

Status: Not applicable

Compliance Date: January 1, 2013

Section: 16

Training to Educators

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.

(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.

Action:

Status: Not applicable

Compliance Date: January 1, 2013

Section: 17

Producers of Educational or Training Materials

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.

(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.

Action:

Status: Not applicable

Compliance Date: January 1, 2015 - For accessible or conversion ready versions of textbooks

January 1, 2020 - For accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources.

Section: 18

Libraries of Educational and 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).

Action:

Status: Not applicable

Compliance Date: January 1, 2015 - For print-based resources or materials

January 1, 2020 - For digital or multimedia resources or materials

PART III – Employment Standard

Section: 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.

Action: Include statement in job advertisement, identify different options for where job advertisements may be posted (e.g. Paper, website bulletin board). Sample recruitment statement for accommodation: We are committed to providing accommodation for persons with disabilities. If you require accommodation, we will work with you to meet your needs throughout the recruitment process.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 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.

Action: Determine how to notify applicants – telephone, email, letter or other alternative means that takes into account their need for accommodation. Identify barriers in the recruitment process: location of interview room, format of tests (if applicable), room set up for interviewee, interviewing timelines, supports, paperwork. Develop interview guidelines that takes into account accommodation for persons with disabilities.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 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.

Action: Include a statement in future employment agreements confirming that *Brigholme Interiors Group* will support the accessibility needs of its employees.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 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.

25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.

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.

Action: Policy added to employee handbook. Communicate in a Town Hall meeting and with a follow-up email in regards to any updates/changes to the policy. New hires will be provided with accessibility policies and training as a part of onboarding process.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 26

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 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.

26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

Action: Conduct an audit of regular communications. List of what employee will require, and ensure that their accessibility needs are met through an individualized accessibility plan.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 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.

(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.

(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.

(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.

Action: In the event that *Brigholme Interiors Group* becomes aware of an employee's disability, the Company will ensure that the employee is provided with information on emergency response protocols that will take into account their individualized requirements. We will review individualized workplace emergency response information every year, or as changes occur (i.e. legislation updates, job transfers, etc.).

We will ensure the individualized emergency response information is updated and communicated to affected employees.

Status: Complete

Compliance Date: January 1, 2012

Section: 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.

28 (2) The process for the development of documented individual accommodation plans shall include the following elements:

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.
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.

Action: *Brigholme Interiors Group* will develop a written process for implementing accommodation plans for persons with disabilities. Create a template to document individual accommodation plans when the need arises.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 29

Return to Work Process

29.(1) Every employer, other than an employer that is a small organization,

- (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.

29. (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 individual documented accommodation plans, as described in section 28, as part of the process.

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.

Action: *Brigholme Interiors Group* will develop a written process for implementing a return to work plan for persons with a disability. Create a template to document the return to work process.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 30

Performance Management

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.

Action: *Brigholme Interiors Group* will review current Performance Management process. Evaluate different options for administering the performance management process to take into account the individual needs of persons with a disability and consider the different methods to provide feedback to employees – on paper, verbally, on-line, etc. If a person with a disability has an Individual Accommodation Plan (IAP), take into account how information needs to be communicated to these individuals.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 31

Career Development and Advancement

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.

Action: *Brigholme Interiors Group* will review current Succession Plan and Career Development processes.

We will keep IAP's in mind when making career development and advancement decisions.

Status: Ongoing

Compliance Date: January 1, 2016

Section: 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.

Action: *Brigholme Interiors Group* will review current Re-deployment processes to take into account the individual needs of persons with a disability as well as any IAP's.

Status: Ongoing

Compliance Date: January 1, 2016

Brigholme Interiors Group accessibility policies (The Customer Service Standard Policy & the Integrated Accessibility Standards Regulation Policy) are available upon request. The policies and the multi-year accessibility plan are available in accessible format, upon request.

FOR MORE INFORMATION, PLEASE CONTACT:

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