

# **Cadillac Fairview Corporation Ltd**

## **Multi-Year Accessibility Plan 2012-2016**

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**In Compliance with O. Reg. 191/11  
Including Information and Communication and  
Employment Accessibility Standards**

**December, 2014**

Due for update – Dec 31/2015.

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## **Introduction**

The Accessibility for Ontarians with Disabilities Act (AODA) was proclaimed by the Province of Ontario in 2005. The legislation aims to develop, implement and enforce accessibility standards in order to achieve full accessibility in the Province by 2025.

Cadillac Fairview is committed to providing accessibility for persons with disabilities through AODA's customer service standard, integrated accessibility standards and all other standards as they are developed, and in accordance with the requirements of the Ontario Human Rights Code.

Therefore, the Cadillac Fairview Corporation Ltd presents this Multi-Year Accessibility Plan which addresses compliance requirements from 2012-2017.

The Plan addresses activities and deliverables specified in the Information and Communication, Employment and Design of Public Spaces Accessibility Standards and Regulations and outlines an action plan for meeting these regulations. This document is available to the public and in alternate format and accessible communication supports upon request.

Cadillac Fairview remains committed to providing excellent customer service to all its customers, including our customers with disabilities.

**Legislation Deadline:**

**January 1, 2012**

## **Integrated Accessibility Standard Regulation: General Regulations**

### **Regulation Requirement**

*O. Reg. 191/11- 13 (1-2)*

Organizations that prepare organizational emergency procedures, plans and public safety information and make that information available to the public, **shall** provide this information in an accessible format or via accessible communication supports as soon as practicable upon request

### **Action Plan**

1. Communication Plan:
  - 1.1. Inform public of alternate format availability. Post notice on website, provide in printed materials and in all other corporate communications.
2. Establish Alternate Format Service Provider - Vendor of Record:
  - 2.1. Source and select Alternate Format Service Provider - Vendor of Record
  - 2.2. Establish internal procedures for processing requests for alternate formats (i.e. how vendor is contacted, how requests are tracked, response procedure to customer, customer follow-up)

### **Responsibility**

Operations – Ontario Portfolio  
Corporate Communications

### **Required Resources**

- 1.1 Communication Plan
- 2.1 Alternate Format Service Provider Vendor
- 2.2 Alternate Format request procedure

### **Status**

Complete

**Legislation Deadline:**

**January 1, 2012**

## **Integrated Accessibility Standard Regulation: General Regulations**

### **Regulation Requirement**

*O. Reg. 191/11- 27 (1-4)*

Individualized workplace emergency response information must be provided upon request and in accessible formats when need is articulated. Individualized workplace emergency response information **shall** be reviewed when: employee moves to different location in organization, employee's overall accommodation needs or plans are reviewed and when employer reviews general emergency response policies.

### **Action Plan**

1. Emergency Response Plan Template
  - 1.1 Create Emergency Response Planning Template and distribute to CF location contacts
2. Communication Plan:
  - 2.1 Inform Staff of Emergency Response assistance

### **Responsibility**

Operations – Ontario Portfolio  
Human Resources

### **Required Resources**

- 1.1 Emergency Response Plan Template
- 2.1 Notice of Emergency Response assistance provided to staff

### **Status**

Complete

**Legislation Deadline:**

**January 1, 2014**

## **Integrated Accessibility Standard Regulation: General Requirements**

### **Regulation Requirement**

*O. Reg. 191/11- 3 (1-4)*

#### Accessibility Policy

Develop Accessibility Policy to address compliance with Integrated Accessibility Standard Regulation. Policy can be one or more documents. Sections have varying compliance Due Dates.

### **Action Plan**

#### 1. Policy:

- 1.1 Update Accessible Customer Service Policy to address requirements of Integrated Accessibility Standard Regulation O. Reg. 191/11
- 1.2 Communicate policy to Cadillac Fairview Ontario location staff (provided in alternate formats - Large Print x 6 Braille x 3 Audio CD x 2eText CD x 1)
- 1.3 Ensure locations post updated policies to websites

### **Responsibility**

Operations – Ontario Portfolio  
Corporate Communications

### **Required Resources**

- 1.1 Accessibility Policy
- 1.2 Circulation to location staff Website posting

### **Status**

Complete

**Legislation Deadline:**

**January 1, 2014**

## **Integrated Accessibility Standard Regulation: General Requirements**

### **Regulation Requirement**

*O. Reg. 191/11- 4 (1-4)*

#### Accessibility Plan

To outline compliance plan in regards to Integrated Accessibility Standard Regulation. Must be posted on website upon completion. Annual Progress Report required. Complete Plan update required every 5 years.

### **Action Plan**

1. Plan Development:
  - 1.1. Develop Multi-Year Accessibility Plan
  - 1.2. Develop Progress Report Template

### **Responsibility**

Operations – Ontario Portfolio  
Corporate Communications

### **Required Resources**

- 1.1 Multi-Year Accessibility Plan
- 1.2 Progress Report Template

### **Status**

Complete

**Legislation Deadline:**

**January 1, 2014**

## **Integrated Accessibility Standard Regulation: General Requirements**

### **Regulation Requirement**

*O. Reg. 191/11- 5 (1-3)*

#### Procurement Procedures – Self-Serve Kiosks

- Obligated organizations shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

### **Action Plan**

- 1 Review of Procurement Procedures:
  - 1.1 Establish Accessibility criteria for purchasing self-serve kiosks

### **Responsibility**

Operations – Ontario Portfolio

### **Required Resources**

- 1.1 Analysis of Procurement Procedures and Purchasing Policy Update to include self-serve kiosks accessibility criteria

### **Status**

Complete



**Legislation Deadline:**

**January 1, 2014**

## **Integrated Accessibility Standard Regulation: Information and Communications**

### **Regulation Requirement**

*O. Reg. 191/11 – 14 (1-7)*

#### Websites\*

New websites and web content **shall** conform to W3C WCAG 2.0 Level A. Except where not practicable, this applies to:

- Websites
- Web content (published after January 1, 2012)
- Web-based applications that an organization controls directly or through a contractual relationship that allows for modification of a product.

### **Action Plan**

#### 1. Website and Application Review:

- 1.1. Source and contract website accessibility audit provider.
- 1.2. Conduct website accessibility audit of the following Cadillac Fairview websites: Retail, Office, Corporate, Mobile, Shops.ca, Retail Promo Tool, Leasing Sites and Talcura Employee Recruitment System
- 1.3. Review web-based applications used in Cadillac Fairview operations – CF shopcard.ca
- 1.4. Include accessibility provisions/criteria in purchase of service contracts for web-based applications

### **Responsibility**

Information Technology

### **Required Resources**

- 1.1 Website accessibility audit
- 1.2 Web Application review and analysis
- 1.3 Update Service contracts to include accessibility criteria
- 1.4 Accessibility Checklists for Procurement

### **Status**

Audits of websites have been completed. Website redesign scheduled to occur from 2015-2018. Audit results to be addressed in redesign process.

Web-based commerce application shopcard.ca undergoing redesign in 2014. Accessibility requirements to be addressed in redesign process.

## Integrated Accessibility Standard Regulation: Information and Communications

### Regulation Requirement

*O. Reg. 191/11 – 7 (1-6)*

#### General IASR Training

Employers **shall** provide training regarding Integrated Accessibility Regulation to all employees and volunteers, persons who participate in developing organizational policy and other persons who provide goods, services or facilities on behalf of the organization.

Training to take place as soon as practicable and **shall** include any changes to policies on an ongoing basis. Record keeping of training provided and number of participants is required

### Action Plan

#### 1. Training Plan Development:

1.1. Contract training vendor

1.2. Train staff in General Requirements, Information and Communication Standard as appropriate and in relation to their roles and responsibilities; for example: accessible web info, accessible print info, how to create in-house accessible documents and PDF's, TTY's, alternate formats and their uses).

1.3. Update Accessible Customer Service Training – refresher training required

1.4. Ensure senior staff participate in online training provided by Ontario Human Rights Commission: <http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>

### Responsibility

Health and Safety & HR

### Required Resources

1. Training Plan
2. Training Vendor

### Status

Training purchased from vendor – October 2014 – Courses Uploaded to CF learn  
Employees notified to complete training by December 31<sup>st</sup> 2014. Human rights code brochure distributed to all Ontario employees.

**Legislation Deadline:**

**January 1, 2015**

## **Integrated Accessibility Standard Regulation: Information and Communications**

### **Regulation Requirement**

*O. Reg. 191/11 – 11 (1-4)*

#### Feedback Mechanism

Ensure accessible feedback mechanism in relation to areas covered under Integrated Accessibility Regulation. Every obligated organization **shall** notify public about availability of accessible formats and communication supports.

### **Action Plan**

#### 1. Feedback Mechanism Update

1.1 Update Feedback mechanism. Ensure web-based feedback mechanism is accessible. Ensure multiple channels of feedback are available.

1.2 Mechanism/Policy to be expanded to include procedures for dealing with alternate format requests and employment related feedback

### **Responsibility**

Corporate Communications

### **Required Resources**

1.1 Feedback mechanism updated

1.2 Policy updated

### **Status**

Complete

## Integrated Accessibility Standard Regulation: Employment

### Regulation Requirement

*O. Reg. 191/11 – 22*

#### Accommodation – Recruitment

Notice **shall** be provided to employees and public about the availability of accommodation for applicants with disabilities during recruitment process.

*O. Reg. 191/11 – 23(1-2)*

#### Accommodation – Selection

Accommodation **shall** be provided to applicants selected to participate in assessment or selection process, upon request. Suitable accommodation **shall** be provided in manner that takes applicant's accessibility needs.

### Action Plan

#### 1. Policies and Procedures:

1.1. Create/Update Employment Policy and Procedures. Ensure policy includes Accommodation Policy for Recruitment and Selection.

1.2. Establish procedure for recruitment accommodations including notice in advertisements/online tool and notifying candidates selected for interviews and testing of availability of accommodation.

#### Training

1.3. Provide procedural training regarding providing applicant accommodation for staff responsible for recruiting, selecting and hiring staff as well as staff who would participate in the recruitment process.

### Responsibility

Human Resources

### Required Resources

1.1 Updated policies

1.2 Updated procedures and online tool

1.3 Procedural training

### Status

In Progress

Legislation Deadline:

January 1, 2016

## Integrated Accessibility Standard Regulation: Employment

### Regulation Requirement

*O. Reg. 191/11 - 24*

#### Accommodation Notice - New Employees

Successful applicant **shall** be informed of availability of accommodation and **shall** be provided with accommodation policy when making offer of employment.

### Action Plan

1. Policy:
  - 1.1. Create procedures/standardized Employment Letter for all Offers of Employment
  - 1.2. Develop Employment Offer Checklist to ensure that all successful applicants/new employees are aware of: Cadillac Fairview Accessibility Policy, Cadillac Fairview Accommodation Policy and Accommodation Planning Procedures and Cadillac Fairview Emergency Response and Evacuation Support Procedures.
  - 1.3. Add Notice of accommodation availability of this availability to be to all employment letters.

### Responsibility

Human Resources

### Required Resources

- 1.1 Template for Offer of Employment letter to include accessibility provision
- 1.2 Offer of Employment – Checklist
- 1.3 Clause added to Updated Standardized Employment Letter

### Status

In Progress

**Legislation Deadline:**

**January 1, 2016**

## **Integrated Accessibility Standard Regulation: Employment**

### **Regulation Requirement**

*O. Reg. 191/11 – 25 (1-3)*

#### Accommodation Notice - All Employees

Accommodation policy provided to all employees and updates provided whenever changes are made

### **Action Plan**

1. Policy/Procedure:

1.1 Provide updates employees as needed

1.2 Procedural training provided to supervisors regarding any policy updates

### **Responsibility**

Human Resources

### **Required Resources**

1.1 Communication Plan

1.2 Training Updates

### **Status**

In Progress

**Legislation Deadline:**

**January 1, 2016**

## **Integrated Accessibility Standard Regulation: Employment**

### **Regulation Requirement**

*O. Reg. 191/11 – 26 (1-2)*

Alternate formats provided to employees with disabilities upon request including information needed to perform employee's job, information generally available in workplace. Employer will consult employee making request when determining suitability of accessible format provided.

### **Action Plan**

1. Policy and Procedure:

1.1 Inform Cadillac Fairview staff of availability of alternate format vendor of record

1.2 Establish Process/procedure regarding how to respond to requests for alternate formats from employees to be established. All Health and Safety and Orientation material (as relevant to the employee and job description) to be included

### **Responsibility**

Human Resources  
Corporate Communications

### **Required Resources**

1.1 Communication Plan  
1.2 Alternate Format request procedure

### **Status**

In Progress

**Integrated Accessibility Standard Regulation: Employment**

**Regulation Requirement**

*O. Reg. 191/11 – 28 (1-2)*

Documented Accommodation Plans provided to employees with disabilities

*O. Reg. 191/11 – 29 (1-3)*

Documented Return-to-Work process established including disability-related accommodations

**Action Plan**

1. Accommodation Planning Tool:

1.1. Create Accommodation Planning Form created

1.2. Create Individualized Accommodation Plans to be completed and on file as required

2. Return-to-Work Accommodation Planning Tool:

2.1 Create Return-to-Work Process and Accommodation Planning Form created

2.2 Complete Individualized Accommodation Plans to be and retain on file as required

**Responsibility**

Human Resources

**Required Resources**

1. Accommodation Planning Template

2. Return-to-Work Accommodation Planning Template

3. Procedural training for Human Resources staff

**Status**

In Progress



**Integrated Accessibility Standard Regulation: Employment**

**Regulation Requirement**

*O. Reg. 191/11 – 30 (1-2); 31 (1-2); 32 (1-2)*

Accessibility Throughout Employment Life-Cycle

Performance Management, Career Development and advancement and Redeployment/Reassignment processes include accessibility accommodation and provided in alternate format

**Action Plan**

1. Performance Management:
  - 1.1 Provide Procedural training for Managers and Supervisors required
2. Career Development and Advancement:
  - 2.1 Establish procedure of addressing accommodation needs in advance of training participation of employee
3. Redeployment:
  - 3.1 Develop process and checklist for accommodation needs for employee transfers and redeployment
  - 3.2 Provide Procedural training for Managers and Supervisors

**Responsibility**

Human Resources

**Required Resources**

1. Procedure
2. Communication Plan
3. Procedural Training
4. Redeployment/Reassignment Checklist

**Status**

In Progress

**Legislation Deadline:**

**January 1, 2016**

## **Integrated Accessibility Standard Regulation: Information and Communications**

### **Regulation Requirement**

*O. Reg. 191/11 – 7 (1-6)*

#### Training in Employment Process and OHRC

Employers **shall** provide training regarding Integrated Accessibility Regulation – Employment Standard and Ontario Human Rights Code to all employees (i.e. Accessible recruitment and screening, employment policy and accommodation planning training).

Training to take place as soon as practicable and **shall** include any changes to policies on an ongoing basis. Record keeping of training provided and number of participants is required

### **Action Plan**

#### 1. Training Plan Development:

1.1 Train staff in Employment Standard and related procedural training as appropriate and in relation to their roles and responsibilities

1.2 Ensure senior staff participate in online training provided by Ontario Human Rights Commission:  
<http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>

### **Responsibility**

Human Resources  
Organizational Development

### **Required Resources**

- 1 Training Plan
- 2 Training Vendor

### **Status**

In Progress

**Legislation Deadline: January 1, 2016**  
**Integrated Accessibility Standard Regulation: Information and Communications**

<b>Regulation Requirement</b>
<p><i>O. Reg. 191/11 - 12 (1)</i>  <u>Organizational Material in Alternate Format:</u>            Except as otherwise provided, every obligated organization <b>shall</b> upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:</p> <p>(a) in a timely manner that takes into account the person’s accessibility needs and in consultation with the person making the request</p>
<b>Action Plan</b>
<p>1. <u>Alternate Format Provision:</u></p> <p>1.1. Create Accessible Style Guide – including standardized templates for accessible word processing, accessible PDF’s and accessible web-based materials.</p> <p>1.2. Participate in accessible template procedural training and other accessible communication refresher training as needed.</p> <p>1.3. Collate inventory of vital organizational material within all departments and obtain quotes for conversion into various alternate formats according to legislated deadlines.</p> <p>1.4. Purchase TTY and establish TTY phone number and protocol</p>
<b>Responsibility</b>
<p>Ontario Operations            Corporate Communications</p>
<b>Required Resources</b>
<p>Standardized Style Guide            Training update            Inventory            Procedures</p>
<b>Status</b>
<p>In Progress</p>

**Legislation Deadline:**

**January 1, 2016**

**Integrated Accessibility Standard Regulation: Design of Public Spaces**

<b>Regulation Requirement</b>
<i>O. Reg. 413/12</i> Standard applies to public spaces that are newly constructed or redeveloped on and after January 1, 2016. The standard applies to new construction or major renovations being designed for the following facilities or elements: <ul style="list-style-type: none"><li>• Recreational trails</li><li>• Outdoor public eating areas</li><li>• Outdoor play spaces</li><li>• Exterior paths of travel</li><li>• Off-street parking</li><li>• Service counters and Waiting areas (indoor and outdoor)</li></ul>
<b>Action Plan</b>
Ensure newly constructed or redeveloped facilities on and after January 1, 2016 meet Accessibility Standard requirements.
<b>Responsibility</b>
Ontario Operations
<b>Required Resources</b>
Analysis of Standard requirements
<b>Status</b>
Analysis completed. Design of Public Spaces criteria to be included in new construction and extensive renovation projects.