

# Canadian Niagara Hotels Group

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)

*Multi-year plan for the Integrated Accessibility Standards*

*May, 2021*

TITLE	AODA STANDARD	ACTION PLAN	STATUS	NOTES
<b>PART 1 - GENERAL</b>				
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 Maintenance – Review policies annually against regulatory/industry updates to ensure ongoing compliance</p> <p>In current policy</p> <p>Policy included in all websites – both customer and candidates for employment and included in new hire electronic documentation/pre-hire process</p> <p>Policy covers all businesses forming part of the Canadian Niagara Hotels Group</p>	<p>Ongoing obligation</p> <p>New Hire Electronic process commenced September, 2014; 2021- additional Marriott properties added</p>	<p>Next review to be completed by January 1, 2024</p>

Accessibility Plans	<p>4.(1) large organizations shall,</p> <p>(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;</p> <p>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and to website</p> <p>(c) review and update the accessibility plan at least once every five years.</p>	<p>Develop multi-year plan</p> <p>HR to provide copies of plan in other accessible formats upon candidate request</p> <p>Review every 5 years</p>	<p>Updated May 2021</p> <p>Ongoing obligation</p> <p>Next review not later than December 1, 2025.</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 on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p>	<p>Requirements are included on internal company website (intranet) and most recent Employee Handbook ( released June 2021). Requirements also part of our pre-employment documentation and selection process ( most recent</p>	<p>Ongoing Obligation</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>7.(2) The training on the requirements of the accessibility standards and on the <i>Human Rights Code</i> referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.</p> <p>7.(3) Every person referred to in subsection (1) shall be trained as soon as</p>	<p>electronic version (Jan 2021).</p> <p>Review sufficiency of information at each time Employee Handbook is updated</p> <p>No person other than employees provide services or facilities</p> <p>Department specific training was developed and conducted and form part of each Departments Standard Operating Procedures. New employees receive training as part of their Department Specific Primary Training. Current Training material in 2021 Employee Handbook released June 2021</p> <p>Staff not previously hired in 2012 were trained in Accessibility for Ontarians with Disabilities in the Fall of 2012. Staff hired</p>	<p>Ongoing obligation</p> <p>Various businesses have their own unique AODA policies, eg. Fallsview Indoor Waterpark and Adventure City- given significant differences of amusement rides and safety requirements</p> <p>Complete</p>	
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	<p>practicable.</p> <p>7.(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>7.(5) The Government of Ontario, the Legislative Assembly, every designated organization 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.</p>	<p><u>after 2012</u> receives material incorporated into the new hire/orientation process. All Staff received via email June 2021 updated Employee Handbook outlining training documents</p> <p>Training will be conducted as required for changes on an ongoing basis. Employee handbook, Management and JHSC/AODA subcommittees, HR staff updated and consulted on changes to policies and processes</p> <p>Records will be retained in accordance with AODA requirements or Ontario's Employment Standards Act, whichever is greater</p>	<p>Ongoing obligation</p>	
<b>PART II - INFORMATION AND COMMUNICATIONS STANDARDS</b>				
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>Current Feedback process was previously developed and forms part of the Company's Policy. Changes to the current Feedback process will be reviewed with Chief Operating Officer in consultation with Operational General Managers</p> <p>Noted in policy which is included in website</p>	<p>Ongoing Review</p>	<p>Next review: by December 15, 2025.</p>
<p>Accessible formats and communication supports</p>	<p><b>12.</b> (1) Organization shall 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 due to disability; and</p> <p>(b) at a cost that is no more than the</p>	<p>All requests will be documented and access format determined</p> <p>In person an telephone access available to expedite timeliness of receiving and responding to person's needs/concerns</p> <p>Company commits that any charge for such accessible formats or supports shall not be more than the regular cost charged</p>	<p>Ongoing Obligation-Data collection and retrieval site created in 2015:  <a href="mailto:aoda@niagarafallshotels.com">aoda@niagarafallshotels.com</a>  which is centrally managed by Human Resources team</p>	

	<p>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>to other persons in Ontario</p> <p>The format will be determined in consultation with the individual making the request</p> <p>The commitment to provide available formats are incorporated in the Policy available to the public, and communicated upon request</p>	<p>Ad hoc requests</p> <p>Ongoing Obligation</p>	
<p>Emergency procedure, plans or public safety information</p>	<p><b>13.</b> (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</p>	<p>Company business units make available to its guests, customers and clients emergency information in an accessible way upon request and as soon as practical in a manner mutually agreed upon</p> <p>Completed.</p>	<p>Ongoing Obligation</p>	

	<p>request.</p> <p>(2) Organizations that prepare emergency procedures, plans or public safety information and make the information available to the public shall meet the requirements of this section by January 1, 2012.</p>	<p>Current employees with disabilities have Individual Emergency Response Plans as outlined in the Company's Emergency Preparedness &amp; Crisis Management Program centrally controlled at the Company through guest property management systems, central reservations and switchboard , operating business and centralized security protocols. Detailed training plans are included in Employee Handbook for employee referral and usage</p>	<p>Ongoing obligation</p>	
<p>Accessible websites and web content</p>	<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>	<p>Completed</p>	<p>Ongoing Obligation</p>	



	<p>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>disabilities.</p>	<p>Ongoing Obligation</p>	
<p>Notice to successful applicants</p>	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>Noted in Employee Handbook. Human Resources and Purchasing work in co-operation with individual departments to address the issue and potential solutions, working with the disabled employee, with respect to temporary or permanent modifications of job task or equipment, wherever reasonable and practical.</p> <p>New Hires receive this information prior to commencing employment through the Company's electronic candidate pre-hire assessment and documentation process, which includes the Company sharing all pertinent policies of the Company, including AODA, Human Rights and the Company's duty to accommodate</p> <p>Any change in existing employment policies, including job accommodation</p>	<p>Ongoing Obligation</p>	

		<p>efforts that take into account an employee's accessibility needs due to disability will be posted to the Recruiting site and updated in a revised Employee Handbook which is provided to all current employees. 2015 Employee handbook released electronically and paper-based to all employees during Summer of 2015</p>		
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>	<p>When accessible formats and communication supports are requested, and in a timely manner, and in consultation with the person making the request, arrangements for accessible formats and communication supports will be made taking the persons disability needs into account at no cost to the person making the request</p> <p>All changes to company policies regarding job accommodation are provided in writing and incorporated by updated employee handbook which is electronically delivered to all staff</p>	<p>Ongoing obligation</p> <p>Complete</p> <p>Ongoing obligation. Updates are noted in this multi-year plan/ AODA policy and posted on Recruiting and business websites</p>	<p>Ongoing</p> <p>Ongoing</p>

Accessible formats and communication supports for employees	<p><b>26. (1)</b> 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,</p> <p>(a) information that is needed in order to perform the employee’s job; and</p> <p>(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>	<p>Consultation includes trade union staff representatives, where applicable and designated AODA worker members to the Joint Health and Safety Committee</p>	Ongoing Obligation	
Workplace emergency response information	<p><b>27. (1)</b> Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such</p>	<p>Standardized accommodation template on Company’s internal intranet which is accessible by all Managers</p>	Ongoing Obligation	

	<p>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,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>Union and Employer have negotiated an amending document to the collective agreement – a letter of understanding outlining the commitments , process, and how the union participates in the process with respect to all issues under this Section</p> <p>Longstanding process already in place. Co-ordinated by department managers and centralized Human Resources</p> <p>Individual RTW/accommodation documentation process updated November 2015</p> <p>Individualized workplace emergency response information procedures have been developed for employees with disabilities. Company's modified duty program reviews and works with employees who experience a disability during the course of their employment for workplace emergency response monitoring and action</p> <p>Workplace Emergency Response Lists/</p>		
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	<p>(5) Every employer shall meet the requirements of this section by January 1, 2012.</p>	<p>Information forms have been prepared for employees who have either disclosed a disability or whom the Company is aware has a disability that could negatively impact them in a case of emergency.</p> <p>Emergency plans are principally generated and controlled at the department level.</p> <p>On an ongoing and regular basis, the Company will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed</p>	<p>Ongoing Obligations</p>	
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Documented individual accommodation plans	<b>28.</b> (1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	The Company will take into account the accessibility needs of employees with disabilities, as applicable when conducting performance management reviews.	Completed	

	<p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"><li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li><li>2. The means by which the employee is assessed on an individual basis.</li><li>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.</li><li>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.</li><li>5. The steps taken to protect the privacy</li></ol>		<p>Ongoing Obligation</p>	
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	<p>of the employee's personal information.</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> <p>(3) Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) identify any other accommodation that is to be provided.</p> <p><b>29. (1) Every employer</b></p> <p>(a) shall develop and have in place a</p>		<p>Completed Dec 15 , 2015. Ongoing Obligation</p>	
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Return to work process	<p>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> <p>(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 documented individual accommodation plans, as described in section 28, as part of the process.</p> <p>(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>		Ongoing Obligation	
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	The Company takes into account the accessibility needs of disabled employees and individual accommodation plans when providing career development and	Completed Dec 15, 2015. Ongoing Obligation	

	<p>disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p> <p>(2) In this section, “performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.</p>	<p>advancement opportunities in order to permit employees to demonstrate their full capabilities and resulting achievements</p>		
<p>Career development and advancement</p>	<p><b>31.</b> (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>(2) In this section,</p> <p>“career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both</p>	<p>The Company will take into account the accessibility needs of disabled employees and individual accommodation plans when redeploying disabled employees in an effort to minimize effects of displacement on employees wherever practical and so long as such redeployment does not otherwise result in the displacement of an existing employee.</p>	<p>Completed December 15, 2015. Ongoing Obligation</p>	

	additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.			
Redeployment	<p>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.</p> <p>(2) In this section, “redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.</p>	The Company will take into account the accessibility needs of disabled employees and individual accommodation plans when redeploying disabled employees in an effort to minimize effects of displacement on employees wherever practical and so long as such redeployment does not otherwise result in the displacement of an existing employee.	Completed December 15, 2015. Ongoing Obligation	
<b>DESIGN OF PUBLIC SPACES</b>				
New buildings and	Should the company build new or make major changes to existing elements of		Future projects or amendments to Ontario’s	Ongoing

major renovations	public spaces.		Building Code	obligation
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