

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 (“AODA”)**

**SHOPPERS DRUG MART INTEGRATED ACCESSIBILITY STANDARDS (“IAS”) – 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.	Policy prepared, to enable compliance with integrated accessibility standards under AODA	Reviewed and Approved	January 1, 2014
4	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 this Regulation;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>Post accessibility plan on website (shoppersdrugmart.ca)</p> <p>Provide this accessibility plan in an accessible format, upon request</p> <p>Identify and address barriers, in consultation and partnership with:</p> <ul style="list-style-type: none"> <li>• external vendors specializing in accommodation</li> <li>• centers of expertise</li> <li>• IT/web department</li> </ul> <p>Review and update this accessibility plan at least once every five (5) years in accordance with AODA requirements</p>	Completed/ Under Review	January 1, 2014

6	Self-Serve 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.	During replacement cycle and/or re-negotiation of lease terms for kiosks have regard to accessibility criteria	Ongoing	January 1, 2014
7	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 Human Rights Code 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>Determine and ensure that appropriate training on the requirements of the IAS and on the Ontario Human Rights Code is provided to all referenced persons, as soon as practicable</p> <p>Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided</p> <p>Ensure that training is updated on an ongoing basis</p>	Completed/ Ongoing	January 1, 2015

**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.	<p>Conduct a review of feedback processes across the organization</p> <p>Leverage external feedback process utilized for current AODA – Customer Service requirements</p> <p>Determine accountability for managing internal and external inquiries</p>	Completed/ Ongoing	January 1, 2015
12	Accessible Formats & Communication Supports	<p>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,</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 accessible formats and communication supports to be provided upon request, regarding the organization’s goods, services and facilities</p> <p>Ensure formats and supports can be provided in a timely manner at a cost that is no more than standard costs</p>	Ongoing	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Develop protocol to determine the most appropriate accessible format or communication support, which includes guidelines for situations where it is impracticable or not possible to provide a requested accessible format or communication support	Ongoing	January 1, 2016

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Notifications to be posted: <ul style="list-style-type: none"> <li>• In a visible area in all locations</li> <li>• On external website</li> <li>• Via print materials, where appropriate</li> </ul>	Under Review	January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	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.	Review and assess workplace health and safety emergency procedures on an ongoing and regular basis and in accordance with the IAS and develop individualized emergency plans, where applicable Emergency procedures, plans and safety information prepared for public use to be made available in an accessible format or with appropriate communication supports, as soon as practicable upon request Review procedures with landlords to ensure compliance and/or a plan to ensure compliance as soon as practicable	Completed/Ongoing	January 1, 2012

14	Accessible Websites & 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.	IT provided with WCAG guidelines; reviewed requirements and timelines for compliance Acquire resources to assist with compliance Continuous review process of WCAG guidelines for changes and updates	Nov 2013/ Ongoing	<p><b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>
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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.	Talent acquisition to review and, as necessary, modify existing recruitment policies, procedures and processes Job advertisements to advise on commitment to providing accommodation for persons with disabilities	Under Review	January 1, 2016
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.	Revise recruitment guides, processes and scripts to ensure candidates are advised of access to accommodation throughout the job selection process Coordinate with external vendors to ensure communications are updated to meet this requirement Identify and address current barriers: location of interview room, format of tests/systems, room set-up for in-person interviews, interviewing timelines, supports, paperwork, etc. Develop protocol to consult with selected applicants who make an accommodation request, which includes guidelines for situations where it is impracticable or not possible to provide a requested accommodation	Under Review	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.	Revise recruitment guides and offer letters accordingly	Under Review	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.	Develop protocol and communication plan to inform current employees and new hires of policies supporting employees with disabilities, which includes guidelines for situations where it is impracticable or not possible to provide a requested accommodation  Circulate IAS Policy via Intranet	Under Review	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Update on-boarding sessions/ employee orientation checklists and provide this information as soon as practicable after new employment begins	Under Review	January 1, 2016
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.	See section 25 (1)  Keep employees up to date on changes to existing policies on job accommodations with respect to disability	Under Review	January 1, 2016

26	Accessible Formats & Communication Supports for Employees	<p>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,</p> <ul style="list-style-type: none"> <li>a) information that is needed in order to perform the employee's job; and</li> <li>b) information that is generally available to employees in the workplace.</li> </ul>	<p>Develop protocol and communication plan to inform employees, upon request, about accessible formats and communication supports for job-related information and general employee information, which includes guidelines for situations where it is impracticable or not possible to provide</p> <p>Ensure standard corporate policies and procedures are readily available in accessible formats</p> <p>Review internal websites to ensure compliance</p>	Under Review	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.	Develop a protocol and process to ensure an appropriate assessment of requirements is conducted and documented	Under Review	January 1, 2016
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.	Review process with health and safety committee, to ensure individualized needs continue to be captured and individualized emergency response information is provided, as appropriate	Completed/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.	Review emergency response process on an ongoing basis at regular health and safety meetings  Ensure individualized workplace emergency response information is available in alternative formats and, upon the employee's consent, provided to designated persons	Completed/ 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.	Disability management process and protocols updated to ensure consistent and timely information is provided based on individual needs	Completed/ 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 (c) when the employer reviews its general emergency response policies.	Disability management process and protocols updated to ensure plans and emergency response information are kept up to date	Completed/ Ongoing	January 1, 2012
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.	Develop a protocol for documenting individual accommodation plans for employees with disabilities  Determine process for consulting with employees to develop plans, as required, during on-boarding and disability management process  Review feasibility of leveraging Workday for ease of access and maintenance of individual plans etc	Under Review	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"> <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 determine if and 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 of the employee's personal information.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is</li> </ol>	Leverage template provided by external vendor, ProLearning, and revise as required to meet needs	Under Review	January 1, 2016
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		<p>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>	<p>Compare current return to work process with external vendor, ProLearning, template to ensure all elements and requirements are captured in current process Review and update current process to ensure return to work process is documented consistently</p>	Under Review	January 1, 2016
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>	See section 29 (1)	Under Review	January 1, 2016
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>	See section 29 (1)	Under Review	January 1, 2016

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.	Review, assess and, as necessary, include in performance appraisals, and performance management guidelines, accessibility criteria	Under Review	January 1, 2016
31	Career Development & 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.	Review, assess and, as necessary, include in career development discussions, tools and templates, accessibility criteria  Develop guidelines to assist leaders when providing career development/advancement opportunities for employees with disabilities	Under Review	January 1, 2016
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 current process, tools and templates for redeployment  Develop guidelines to assist leaders when redeploying employees with disabilities	Under Review	January 1, 2016