

The Four Points by Sheraton

Accessibility for Ontarians with Disabilities Act (AODA)
Multi-year plan for the Integrated Accessibility standards

<i>Component</i>	<i>AODA Standard</i>	<i>Action Plan</i>	<i>Deadlines</i>	<i>Status</i>
PART 1 – GENERAL REQUIREMENTS				
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 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>A third party, Workplace Safety & Prevention Services (WSPS), was contracted to complete the statement of commitment, policy on the Integrated Accessibility Standards Regulation.</p>	January 2014	Complete
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 requirement 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>A third party, Workplace Safety & Prevention Services (WSPS) was contracted to complete a multi-year accessibility plan.</p> <p>Multi-year plan is posted to the website and reviewed once every 5 years.</p>	January 2014	Complete

Self-Serve Kiosk	6. Large and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-serve kiosks.	All The Four Points by Sheraton self-serve kiosks are accessible.	January 2014	Complete
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>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization’s policies;</p> <p>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 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>All employees and volunteers, all persons who participate in developing the organization policies; and all other person who provide goods, services or facilities on behalf of the organization will be trained. Training will be on the requirements of the integrated accessibility standards and will be appropriate to the duties of the individual being trained. Employees will also be trained on the Ontario Human Rights Commissions videos, <i>Working Together: The Code and AODA</i>.</p> <p>In additions, employees will be trained on the relevant IASR information and the organization’s Multi-Year Accessible Plan.</p>	January 2015	<p>Training is always ongoing. We train AODA and communicate changes, if any.</p> <p>Complete</p>
Accessibility Reports	86.1 Organizations shall file the accessibility report according to the following schedule: every three years in the case of large organizations	Accessibility reports have been submitted for years required.	January 2015	Complete

PART II- INFORMATION AND COMMUNICATION STANDARDS

<p align="center">Feedback</p>	<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>The Four Points by Sheraton currently receives feedback via e-mail and surveys. Customers can also contact us by phone or speak to an employee to accept feedback. Information about the availability of an accessible format will be noted in the body of our survey requesting feedback or when a customer calls in.</p> <p>It will be communicated to the general public if anyone requires accessible formats or communication supports to provide us with feedback, please notify us using our contact information.</p>	<p align="center">January 2015</p>	<p align="center">Complete</p>
<p align="center">Accessible formats and communication supports</p>	<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>The Four Points by Sheraton, upon request, provides or arranges for the provision of accessible formats for persons with disabilities. The availability of accessible formats and communication supports will be communicated through the “one pager” on AODA posted at the reception or on the organization’s website and in the welcome package provided to all guests.</p> <p><i>“If you require an accessible format of any documents used during your visit to our facilities, please notify the person you will be meeting.”</i></p> <p>Communication supports will be provided in a timely manner which takes into account the person's needs. The cost to provide this service shall not be incurred by the customer/client. The customer/client will be consulted with to determine the suitability of</p>	<p align="center">January 2016</p>	<p align="center">Complete, continuous revisions and better practises are ongoing</p>

		<p>a communication support. <i>"If you require communication support to participate in a meeting or an event, please notify the front desk"</i>.</p> <p>Accessible formats will be determined in consultation with the individual making the request. The commitment to provide available formats are incorporated in the Policy available to the public and communicated upon request.</p>		
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. (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>Any emergency procedures/plan or public safety information The Four Points by Sheraton will be made available in an accessible format upon request. The following AODA statement will be posted at the front desk and in the welcome package for all guests, <i>"If you require assistance in the event of an emergency evacuation, please notifies us"</i>. The format is dependent upon the request of the individual.</p>	January 2012	Complete
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. 14.(4) Designated organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule: 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</p>	<p>Will meet requirements within the specified timeframes.</p>	January 2021	Ongoing

	content must conform with WCAG 2.0 Level AA, other than; i. success criteria 1.2.4 Captions (Live), and ii. Success criteria 1.2.5 Audio Descriptions (Pre-recorded).			
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.	The Four Points by Sheraton will notify applicants when they are called for an interview about the availability of assistance during the selection process. AODA accommodation requests are included in job postings and advertisements. All hiring managers will be trained and communicated to about all process requirements.	January 2016	Complete
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. 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.	Candidates, selected or not, are notified on the job posting and application website that accommodations are available upon request. Applicants who request an accommodation are directed to Human Resources and are able to express their needs for accommodation with an HR representative. Accommodation supports will be mutually agreed upon.	January 2016	Complete
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.	The Four Points by Sheraton will notify the successful applicant(s) of the policies for assisting employees with disabilities. All hiring managers will be trained on all process requirements.	January 2016	Complete

<p>Informing Employees of Supports</p>	<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>The Four Points by Sheraton will inform all employees of their policies for supporting employees with disabilities. Employees are taught about AODA accommodations and policies through company orientations. Any changes to any AODA accommodation efforts or policies will be communicated to all employees as required.</p>	<p>January 2016</p>	<p>Complete</p>
<p>Accessible Formats and Communication Supports for Employees</p>	<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> <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>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>January 2016</p>	<p>Complete</p>
<p>Workplace Emergency Response Information</p>	<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. (2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall</p>	<p>The Four Points by Sheraton will create an individualized workplace emergency response plan for employees who have a disability and require assistance(s)/supports to evacuate their workplace in an emergency. The employee communication board will be used to communicate this requirement to staff.</p> <p>With the employee's consent, the person</p>	<p>January 2012</p>	<p>Complete</p>

	<p>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>(5) Every employer shall meet the requirements of this section by January 1, 2012.</p>	<p>designated to provide assistance to the employee will be provided with the necessary information to assist the employee with the disability.</p> <p>On an ongoing basis, we will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.</p>		
<p>Documented Individual Accommodation Plans</p>	<p>28. (1) Employers shall develop and have in place a 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> <p>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>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.</p>	<p>The Four Points by Sheraton will create an individual accommodation plan for any employees, who have communicated their disability.</p> <p>With the employee's consent, the person designated to provide assistance to the employee will be provided with the necessary information to assist the employee with the disability.</p> <p>There may be times when The Four Points by Sheraton will initiate a dialogue to offer assistance to employees who are clearly unwell or perceived to have a disability. The employee will be included in the development of the plan. The Four Points by Sheraton may seek outside medical or other expert evaluations in order to provide appropriate supports at the expense of The Four Points by</p>	<p>January 2016</p>	<p>Complete</p>

	<p>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.</p> <p>5. The steps taken to protect the privacy 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, (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; (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>Sheraton</p> <p>The plan will be reviewed when there is a change in the employee's disability or job.</p>		
Return to Work	29. (1) Every employer shall	The Four Points by Sheraton has a return to	January 2016	Complete

Process	<p>(a) 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>(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>	<p>work process in place. Managers will modify their current return to work process to include employees who have been absent from work due to a non-occupational disability and require disability-related assistance in order to return to work.</p> <p>The return to work process will be documented. If an individual's injury is covered by the return to work provisions of the Workplace Safety and Insurance Act, then that Act's return to work process will apply.</p>		
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>(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>The Four Points by Sheraton will take into account the accessibility needs of employees with disabilities, as applicable when conducting performance reviews.</p>	January 2016	Complete
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>(2) In this section, "career development and advancement" includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to</p>	<p>The Four Points by Sheraton will take into account the assistance required by employees with disabilities to succeed elsewhere in the organizations or to take on new responsibilities within their current position.</p> <p>If the employee has an individual assistance plan in place, the plan will be updated to reflect the changes in their new responsibilities.</p>	January 2016	Complete

	<p>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 additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.</p>			
<p>Redeployment</p>	<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. (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>	<p>In the event that The Four Points by Sheraton initiates a redeployment process, it will consider the accessibility needs of employees with disabilities when moving them to other positions within the organization. If the employee has an individual assistance plan, the plan will be reviewed and updated to reflect the changes in their new responsibilities.</p> <p>If an employee with a disability is laid off, an Employment Ontario Service provider will be enlisted to assist with a job search. The following service providers are in Niagara:</p> <p>Niagara Employment Help Centre. Ontario Employment Services 6100 Thorold Stone Rd Unit 7, Niagara Falls, ON L2J 1A3 Tel: 905-358-0021</p> <p>YMCA of Niagara. St Catharines - Bunting Rd. 285 Bunting Rd, St Catharines, ON L2M 7T9 Tel: 905-684-3500</p> <p>Niagara Centre for Independent Living. 122 Queenston St, St Catharines, ON L2R 2Z3 Tel: 905-684-7111</p>	<p>January 2016</p>	<p>Complete</p>

DESIGN OF PUBLIC SPACES

New Buildings and Major Renovations	Should the company build new or make major changes to existing elements of public spaces.	The Four Points by Sheraton will continue to comply with the requirements of the Amendments to Ontario's Building Code All construction/renovations teams are responsible for compliance of this provision.	----	Ongoing compliance
Exterior Paths of Travel	Sec. 80.21 Applies to newly constructed and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose and not to provide a recreational experience. O. Reg. 413/12, s. 6.	The Four Points by Sheraton has not constructed or redeveloped an exterior path of travel since January 1, 2017. Should The Four Points by Sheraton construct or redevelop an exterior path of travel in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.	January 2017	Complete
Accessible Parking	Sec. 80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.	The Four Points by Sheraton has not constructed or redeveloped any accessible parking spaces since January 1, 2017. Should THE FOUR POINTS BY SHERATON construct or redevelop accessible parking spaces in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.	January 2017	Complete
Obtaining Services	Sec. 80.40 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. O. Reg. 413/12, s. 6	The Four Points by Sheraton has constructed a new service counter since January 1, 2017. AODA requires service counters be at the height of someone on a mobility device. For further guidance on this requirement the CSA B651 – 12 was referenced to ensure service counters were at least 680 mm or 27 inches in height or a clear opening. The Four Points by Sheraton has not	January 2017	Complete

		constructed or redeveloped a fixed queuing guide or waiting area since January 1, 2017. Should The Four Points by Sheraton construct or redevelop a service counter, fixed queuing guide or waiting area in the future, it will ensure it meets the accessibility requirements as outlined in Ontario Regulation 191/11.		
Maintenance of Accessible Elements	<p>Sec. 80.44 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces</p> <p>2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6.</p>	<p>The Four Points by Sheraton lease hold agreements require the leaser to ensure all assessable elements in common areas are maintained.</p> <p>Any accessible The Four Points by Sheraton is solely responsible for have maintenance schedules as required under other legislation such as the TSSA for our elevators.</p> <p>Procedures for dealing with temporary disruptions have been established and communicated to associates.</p>	January 2017	Complete