
ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT

MULTI-YEAR ACCESSIBILITY PLAN

AODA: MULTI-YEAR ACCESSIBILITY PLAN

Our Commitment

Duka Property Management Inc. (“Duka”) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario’s accessibility laws.

Introduction

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* is to create an accessible and barrier-free Ontario by 2025 by identifying, and to the extent possible, preventing and eliminating barriers experienced by persons with disabilities.

The Accessibility Standards for Customer Service (or Ontario Regulation 429/07) was the first standard under the AODA to become law. It has been established to ensure goods and services are, where at all possible, equally accessible to every Ontarian.

The Integrated Accessibility Standards (or Ontario Regulation 191/11) requires employers to ensure that its policies, practices, and procedures are consistent with the core principles of dignity, equality of opportunity, integration and independence. Duka is an “obligated organization” and is in compliance with the phased-in requirements of the regulation.

Accessibility Plan

The *Integrated Accessibility Standards Regulation (“IASR”)* requires every employer with 50+ employees to develop a Multi-Year Accessibility Plan and post it on their website. This Multi-Year Accessibility Plan (“Accessibility Plan”) outlines Duka’s compliance with the AODA and current achievements in regards to accessibility, sets out Duka’s upcoming obligations pursuant to the AODA, and identifies how Duka will meet those obligations.

The objective of this plan is to support Duka’s compliance with the AODA and the IASR in treating all people in a way that allows them to maintain their dignity and independence.

The Accessibility Plan applies to all departments at Duka. It will be reviewed and modified to reflect Duka’s accomplishments in improving our services for persons with disabilities and to maintain compliance with the IASR.

Barriers

Barriers are anything that keeps someone with a disability from fully participating in all aspects of society because of his or her disability. Meeting Ontario's accessibility laws will help Duka to identify and remove many barriers that are unique to property management industry.

Here are few examples of typical barriers to accessibility encountered by persons with disabilities:

- a) **Attitudinal** barriers may result in people with disabilities being treated differently than people without disabilities.
Example: A receptionist who talks to an individual's support person rather than the individual with a disability.
- b) **Informational and Communication** barriers arise when a person with a disability cannot easily receive and/or understand information that is available to others.
Example: Communicating important messages over an intercom that people who have hearing loss cannot hear clearly.
Example: Publications that are not available in large print, digitally, Braille or other accessible formats.
- c) **Physical and Architectural** barriers occur in the environment and prevent access for people with disabilities.
Example: A door knob that cannot be twisted by a person with limited mobility and strength, such as someone with arthritis.
Example: A hallway or door that is too narrow for a person who uses a wheelchair to pass through safely.
- d) **Systemic** barriers in policies, practices and procedures result in people with disabilities to being treated differently than others or sometimes excluded altogether.
Example: Meetings or conferences that are held in locations that are not accessible to people with disabilities.
- e) **Technological** barriers occur when technology or the way it is used does not meet the needs of people with disabilities.
Example: A website that does not support screen reading software.

Accessibility Plan Development: Accomplishments and Process to Date

Duka's goal is to create a consistent environment with equal opportunities by removing and preventing barriers. Duka has taken various steps to create an accessible organization and environment for its employees and customers.

1. AODA Customer Service Standard: Completed
 - a. Policy & procedures: created and communicated to employees.
 - b. Feedback: Survey Form has been created.
 - c. Customer Service Training Resource: Created & distributed to employees. Completion of

the Resource is a mandatory requirement for all Duka existing employees and part of the onboarding process for newly hired members.

- d. Written record of provided training is kept in employees' files.
- e. Staff, volunteers and seasonal employees have been trained to serve customers of all abilities, welcome service animals and support persons.
- f. Clients have several options available to provide feedback on the accessibility of Duka's services. A process is in place to ensure that all feedback collected is reviewed and appropriate actions are taken.
- g. Accessible information: Printed materials are available in larger fonts.

2. AODA Integrated Accessibility Standard: Completed

- a. Policy & procedures: created, posted & distributed to employees.
- b. Employee Emergency Information Worksheet: Created and distributed to employees. Completion of the *Worksheet* is a mandatory requirement for all Duka existing employees and part of the onboarding process for newly hired members.
- c. Accessible employment: Hiring, retaining and career development practices are accessible to all employees.
- d. Duka new website and web content complied with Web Content Accessibility Guidelines (WCAG) 2.0.

3. Accessibility Compliance Report filed

4. Multi-Year Accessibility Plan: In progress

- a. Multi-Year Accessibility Plan: Created, distributed to employees & posted on Duka website in an accessible format.

Duka Multi-Year Accessibility Plan

A. General

IASR Requirement	Action	Status	Compliance Date
<p>1. Establishment of accessibility policies 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 this Regulation.</p>	<ul style="list-style-type: none"> ▪ Create & distribute policy & procedures to all Duka employees 	Completed	December, 2014
<p>2. Accessibility Plans 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>	<ul style="list-style-type: none"> ▪ Understand and outline the requirements of the IASR ▪ Identify barriers by soliciting feedback from Administration & Management teams ▪ Create the Multi-Year Accessibility Plan ▪ Post Multi-Year Accessibility Plan on Duka Website 	Completed	December, 2015
<p>3. Training</p> <p>a) 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> <ul style="list-style-type: none"> ▪ all employees, and volunteers; ▪ all persons who participate in developing the organization’s policies; and ▪ all other persons who provide goods, services or facilities on behalf of the 	<ul style="list-style-type: none"> ▪ Create & distribute the AODA Training Resource to employees <i>Note: Completion of the training is a mandatory requirement for all Duka existing employees and part of the onboarding process for newly hired members.</i> ▪ Keep record of all completed trainings with dates on which the training is provided and the number of individuals to whom it is provided (<u>Ongoing requirement</u>) 	Completed	February, 2015

<p>organization.</p> <p>b) Every large 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>			
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B. Information and Communications Standard

IASR Requirement	Action	Status	Compliance Date
<p>1. Feedback</p> <p>a) 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>b) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<ul style="list-style-type: none"> ▪ Determine all current feedback surveys and mechanisms at Duka ▪ Create and make available Surveys Forms ▪ Update current process for leaving feedback by creating alternative accessible formats (as requested) 	Completed	December, 2014
<p>2. Accessible formats and communication supports</p> <p>a) Every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <ul style="list-style-type: none"> ▪ in a timely manner that takes into account the person’s accessibility needs due to disability; and ▪ at a cost that is no more ▪ than the regular cost charged to other persons. <p>b) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>c) Every obligated organization</p>	<ul style="list-style-type: none"> ▪ Ensure that accessible formats, communication tools and technology is available at Duka for adequate customer service ▪ Evaluate the quality and functionality of feedback format and communication support that takes into consideration the needs of each individual (ongoing) ▪ Establish a process of responding to, approving or declining a request to alter the feedback form format ▪ Post information on website to ensure public and employees are aware that written information and other forms of communication are available in different format upon request 	Completed	December, 2014

shall notify the public about the availability of accessible formats and communication supports.			
3. Accessible websites and web content 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.	<ul style="list-style-type: none"> ▪ Duka IT support to review the website and ensure the accessible format requirements have been met ▪ Conduct an assessment of current web functionality to ensure compliance and adequate accessibility features 	Completed	May, 2015

C. Employment Standards

IASR Requirement	Action	Status	Compliance Date
1. Recruitment, General Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<ul style="list-style-type: none"> ▪ Review all mechanisms for posting available positions (websites and internal) ▪ Incorporate language on postings and Duka career website to make applicants (internal/external) aware that accommodation is available in accordance with AODA 	Ongoing	January, 2016
2. Recruitment, assessment or selection process a) 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. b) 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.	<ul style="list-style-type: none"> ▪ Ensure that all individuals responsible for recruiting will advise all applicants over the phone or through email that accommodations are available upon request ▪ Consult and provide the applicants accommodation taking into account their disability needs 	Ongoing	January, 2016

<p>3. Notice to successful applicants Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> ▪ Incorporate in offer letter a section regarding Duka’s accessibility policies and where to access additional information on Duka website 	Ongoing	January, 2016
<p>4. Informing employees of supports</p> <p>a) 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>b) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>c) 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>	<ul style="list-style-type: none"> ▪ Create and communicate Duka’s accessibility policies and procedures to employees ▪ Provide Accessibility policies and procedures to newly hired members ▪ Distribute any changes and updates to current accessibility policies and procedures to all employees in a timely manner 	Ongoing	January, 2016
<p>5. Accessible formats and communication supports for employees</p> <p>a) 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"> ▪ information that is needed in order to perform the employee’s job ▪ information that is generally available to employees in the workplace <p>b) The employer shall consult with the employee making the request in determining the suitability of an accessible</p>	<ul style="list-style-type: none"> ▪ Advise all employees that written information and other forms of communication are available in different format upon request. ▪ Consult with employees to determine their accommodation needs and provide a suitable format or communication support 	Ongoing	January, 2016

format or communication support.			
<p>6. Workplace emergency response information</p> <p>a) 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.</p> <p>b) 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>c) 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>d) Every employer shall review the individualized workplace emergency response information:</p> <ul style="list-style-type: none"> ▪ when the employee moves to a different location in the organization ▪ when the employee’s overall accommodations needs or plans are reviewed ▪ when the employer reviews its general emergency response policies. 	<ul style="list-style-type: none"> ▪ Develop Individualized Workplace Emergency Response Form upon request ▪ Obtain permission from employee who requires assistance in case of emergency to share individualized workplace emergency response information with the designated person ▪ Duka HR department will provide Individualized Workplace Emergency Response Form to an employee who requires assistance, as soon as possible ▪ Review individualized workplace emergency response information as needed (due to a move, or change in accommodation needs) 	Ongoing	January, 2016
<p>7. Documented individual accommodation plans</p> <p>a) Employers shall develop and have in place a written process</p>	<ul style="list-style-type: none"> ▪ Review of current accommodation processes and practices ▪ Develop and implement a 	In progress	January, 2016

<p>for the development of documented individual accommodation plans for employees with disabilities</p> <p>b) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> ▪ The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. ▪ The means by which the employee is assessed on an individual basis. ▪ 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. ▪ The manner in which the employee can request the participation of a representative from the workplace in the development of the accommodation plan. ▪ The steps taken to protect the privacy of the employee's personal information. ▪ The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. ▪ If an individual accommodation plan is denied, the manner in which 	<p>standard process for the development of individualized accommodation plans; in accordance with AODA</p> <ul style="list-style-type: none"> ▪ Educate all employees on the Accessibility policies and processes and procedures for requesting individual plans 		
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<p>the reasons for the denial will be provided to the employee.</p> <ul style="list-style-type: none"> ▪ The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 			
<p>8. Return to work process</p> <p>a) Every employer:</p> <ul style="list-style-type: none"> ▪ 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 ▪ shall document the process <p>b) The return to work process shall:</p> <ul style="list-style-type: none"> ▪ 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 ▪ use documented individual accommodation plans <p>c) 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>	<ul style="list-style-type: none"> ▪ Develop the process and outline the steps that will be taken to help employees return to work when they have been absent because of a disability or need some form of accommodation to return to work ▪ Document the return to work process 	<p>In progress</p>	<p>January, 2016</p>
<p>9. Performance Management</p> <p>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>	<ul style="list-style-type: none"> ▪ Assess current performance review processes to ensure accessibility features are incorporated upon request (i.e., forms accessible, conversations in plain text) ▪ Ensure supervisors provide sufficient time to allow for employees to review and understand feedback prior to the performance review meeting 	<p>Ongoing</p>	<p>January, 2016</p>

<p>10. Career development and advancement 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>	<ul style="list-style-type: none"> ▪ Review of current training and professional development materials to determine accessibility features ▪ Ensure all future training programs and materials are developed with accessibility features in mind ▪ Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA (as needed) 	<p>In progress</p>	<p>January, 2016</p>
<p>11. Redeployment 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>	<ul style="list-style-type: none"> ▪ In the event that redeployment is used, educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs 	<p>Ongoing</p>	<p>January, 2016</p>