

Multi Year Integrated Accessibility Standards Regulation Policy Statement & Plan – 2013 - 2018

Information and Communications, Employment, Transportation and Public Spaces

1. Purpose

Under the Accessibility for Ontarians with Disabilities Act, 2005 all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards Regulation in the areas of Employment, Information and Communications, Transportation and Public Spaces for UNFI in accordance with Ontario Regulation 191/11, Ontario Regulation 413/12 and with the Ministry of Community and Social Services. The intent of the regulation is to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations". The Integrated Accessibility Standards Regulation came into force July 1, 2011.

2. Scope and Responsibilities

This policy has been drafted in accordance with the regulation and addresses how UNFI achieves accessibility through meeting the regulation's requirements. It provides the overall strategic direction that UNFI will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include the following four (4) sections:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training; and
- Other specific requirements under the Information and Communications, Employment Transportation Standards and Public Spaces.

3. Policy Statement and Organizational Commitment

UNFI is committed and guided by the four (4) core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in *Canadian Charter of Rights and Freedoms*, and the *Accessibility for Ontarians with Disabilities Act, 2005*.

UNFI shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

4. Definitions

Below is a list of twenty (20) definitions in alphabetical order used in this policy:



Accessible Formats may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

Accommodation means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

Communication Supports may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Conventional Transportation Service Provider means a designated public sector transportation organized that provides conventional transportation services that operates solely within the Province of Ontario.

IAP means Individualized Accommodation Plan

IASR means Integrated Accessibility Standards Regulation

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Internet Website means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

Kiosk means a interactive electronic terminal including a point of sale device, intended for public use that allows users to access one or more services or products or both.

Maintenance of Public Spaces means activities that are intended to keep existing public spaces and elements in existing public spaces in good working order or to restore the spaces or elements to their original condition, examples of which include painting and minor repairs.

Medical Aid means an assistive device including respirators, and portable oxygen supplies.

Mobility Aid means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device means a cane, walker, wheelchair, scooter or similar aid.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Ready Format means an electronic or digital format that facilitates conversion into an accessible format.

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.

Specialized Transportation Services means public passenger transportation services that operate solely with the Province of Ontario, are provided by a designated public sector transportation organization and are designed to transport persons with disabilities.

Unconvertible means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines means the World Wide Web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines” (WCAG) 2.0.

5. General Provisions

This section covers the general requirements of the Integrated Accessibility Standards Regulation.

Multi-Year Accessibility Plan

UNFI’s Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*. UNFI will report annually as required on the progress and implementation of the plan, post the information to UNFI’s website and will provide it in alternative formats upon request. The plan will be reviewed, updated and filed at least once every three years.

Procuring or Acquiring Goods, Services or Facilities

UNFI is not required under this legislation to ensure we use accessibility criteria and features when procuring or acquiring goods, services or facilities. UNFI will however, take it into consideration, accessibility criteria and features as much as possible, when procuring or acquiring goods, services or facilities to show our commitment to accessibility.

Self Service Kiosks

UNFI will regard to the accessibility for persons with disabilities when designing, procuring or acquiring self service kiosks.

Training

UNFI will ensure that training is provided to Ontario based store associates, and volunteers, and those that develop the organization’s policies, on the requirements of the accessibility standards referred to in the regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements, training will be provided to include those changes. UNFI shall maintain a record of the dates when training was provided and the number of individuals to whom it was provided. UNFI shall ensure that others that provide goods, services or facilities on behalf of the organization have had training.

6. Information and Communications Standard

UNFI will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If UNFI determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communications is not readily available, UNFI will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

Emergency Information

If UNFI prepares emergency procedures, plans or public safety information and makes the information available to the public, UNFI shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

UNFI has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. UNFI will notify the public about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

UNFI shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities by following the four bullets listed below:

- i. Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- ii. At a cost that is no more than the regular cost charged to other persons;
- iii. Consult with the person making the request and determine suitability of an accessible format or communication support;
- iv. Notify the public about the availability of accessible formats and communication supports.

Website Accessibility

UNFI shall make their internet website 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. By January 1, 2021 all internet website and web content backdated to 2012 will conform with WCAG 2.0 Level AA.

7. Employment Standard

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how UNFI will provide accessibility throughout the entire employment cycle. It applies in respect to employees and does not apply to volunteers and other non-paid individuals.

The requirements of the Employment Standard shall be met by UNFI.

Recruitment

UNFI shall notify employees and the public about the availability of accommodations for applicants with disabilities as per three (3) bullets below:



- i. During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- ii. If a selected applicant requests an accommodation, UNFI shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability;
- iii. Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Notification

UNFI 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 a disability for the two (2) situations below:

- i. As required to new employees as soon as practicable after they begin their employment;
- ii. 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 a disability.

Accessible Formats and Communication Supports

In addition and where an employee with a disability requests it, UNFI will consult with the employee to provide or arrange for the provision of accessible formats and communication supports as per the following three (3) bullets below:

- i. Information that is needed in order to perform the employee's job;
- ii. Information that is generally available to employees in the workplace; and
- iii. Consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan (IAP)

UNFI shall have in place a written process for developing a documented individual accommodation plan for employees with a disability. Process to include the twelve points below:

- i. The employee's participation in the development of the IAP;
- ii. Assessment on an individual basis;
- iii. Identification of accommodations to be provided;
- iv. Timelines for the provision of accommodations;
- v. Steps for UNFI to request an evaluation by outside medical or other expert to assist in the accommodation request;
- vi. The circumstances under which the employee may request the participation of a human resources or health and safety representative from the workplace;
- vii. Steps taken to protect the privacy of the employee's personal information in maintaining compliance with PIPEDA and appropriate release of information;
- viii. Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- ix. If denied, the reasons for denial are to be provided to the employee;
- x. A format that takes into account the employee's disability needs;



- xi. If requested, any information regarding accessible formats and communication supports provided;
- xii. Identification of any other accommodation that is to be provided.

Return to Work

UNFI will have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes shall be documented and must outline the steps that UNFI will take to facilitate the return to work and include an individual accommodation plan.

Performance Management, Career Development and Advancement and Redeployment

UNFI will take into account the accommodation needs and/or individual accommodation plans of employees for the three points below when:

- i. Using performance management processes;
- ii. Providing career development and advancement information;
- iii. Using redeployment procedures.

Workplace Emergency Response Information

UNFI shall provide individualized workplace emergency response information to employees who have a disability as per the following four (4) points below:

- i. 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;
- ii. If the employee who receives an individual workplace emergency response information requires assistance and with the employee's consent, UNFI shall provide the workplace emergency information to the person designated by UNFI to provide assistance to the employee;
- iii. As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- iv. Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

8. Transportation Standard

The Transportation Standard will make it easier for people to travel in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

UNFI is not affected by the Transportation Standard but will inform staff, during their staff training, of the positive steps being made towards better accessible transit.

9. Public Spaces

UNFI shall incorporate accessibility into public spaces that are newly constructed or redeveloped on and after January 1, 2017. UNFI will ensure that we follow the existing requirements stated under the

Design of Public Spaces Standards (Accessibility Standards for the Built Environment maintenance) for recreational trails and beach access routes, outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking, and service related elements. UNFI shall also provide maintenance and restoration of public spaces by ensuring UNFI's multi-year accessibility plan includes procedures for preventative and emergency of accessible elements in public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

10. Regulatory Requirements

An Administrative Monetary Penalties scheme is being established under the Accessibility for Ontarians with Disabilities Act (AODA). The scheme will allow a director or a designate to issue an order against a person, organization or corporation to pay a penalty amount as a result of non-compliance with the AODA or the accessibility standards. The largest penalty amount that can be issued to an individual or an organization that is not a corporation is \$50,000.

Use of administrative monetary penalties will be considered an avenue of last resort when all other compliance assistance and improvement options have been exhausted.

The License Appeal Tribunal (LAT) will hear appeals from organizations of director's orders, but not individual complaints. Individuals who feel their human rights have not been met would continue to complain to the Ontario Human Rights Commission.

<u>GENERAL</u> Deliverables on Multi Year Accessibility Plan	Proposed Implementation Date	Legislated Date
Policies & Procedures <ul style="list-style-type: none"> • Create policy with Statement of Organizational Commitment in written form • Approval sign off • Make policy statement available to public • Available in alternative formats – upon request 	January 1, 2014 January 1, 2014 January 1, 2014 January 1, 2014	January 1, 2014 January 1, 2014 January 1, 2014 January 1, 2014
Accessibility Plan – Multi Year <ul style="list-style-type: none"> • Develop Accessibility Plan • Post accessibility plan to website • Prepare Annual Status Report and post/file • Review every 3 years and post/file • Provide in alternative formats – upon request 	January 1, 2014 January 1, 2014 December 31, 2014 December 31, 2017 January 1, 2014	January 1, 2014 January 1, 2014 December 31, 2014 December 31, 2017 January 1, 2014

<p>Accessibility Self Service Kiosk</p> <ul style="list-style-type: none"> • Have regard for accessibility when purchasing 	<p>January 1, 2014</p>	<p>January 1, 2014</p>
<p>Training</p> <ul style="list-style-type: none"> • Provide training for all ON based head office and store employees, volunteers, policy developers regarding the requirements of the accessibility standards and on the Human Rights Code • Decide on mode of delivery of training • Create training schedule for current staff and new staff • Sign in sheets for record keeping • Training completed 	<p>January 1, 2015</p> <p>January 1, 2015 January 1, 2015 January 1, 2015 January 1, 2015</p>	<p>January 1, 2015</p> <p>January 1, 2015 January 1, 2015 January 1, 2015 January 1, 2015</p>

<p><u>INFORMATION AND COMMUNICATIONS</u> Deliverables on Multi Year Accessibility Plan</p>	<p>Proposed Implementation Date</p>	<p>Legislated Date</p>
<ul style="list-style-type: none"> • Emergency procedure plans or public safety information – accessible 	<p>January 1, 2013</p>	<p>January 1, 2013</p>
<ul style="list-style-type: none"> • Feedback – is feedback system accessible upon request 	<p>January 1, 2015</p>	<p>January 1, 2015</p>
<ul style="list-style-type: none"> • Accessible formats and communication supports upon request – timely manner, no cost charged to other persons 	<p>January 1, 2016</p>	<p>January 1, 2016</p>
<ul style="list-style-type: none"> • Create inventory of current documents 	<p>January 1, 2016</p>	<p>January 1, 2016</p>
<ul style="list-style-type: none"> • Create document renewal plan 	<p>January 1, 2016</p>	<p>January 1, 2016</p>
<ul style="list-style-type: none"> • Create strategic communication plan <ul style="list-style-type: none"> ○ Create process flow of documents ○ Who creates source documents 	<p>January 1, 2016</p>	<p>January 1, 2016</p>

<ul style="list-style-type: none"> ○ Who ensures PDFs are accessible ○ Who checks for accessibility before posting to website ○ Corporate wide fonts ○ Staff training on accessible document creation ○ Analysis of website content and new content 		
<ul style="list-style-type: none"> ● All internet websites and web content WCAG 2.0 Level AA compliant 	January 1, 2021	January 1, 2021
<ul style="list-style-type: none"> ● Review all content on website up to 2012 to ensure everything on the site is accessible 	January 1, 2021	January 1, 2021

<u>EMPLOYMENT</u>		
Deliverables on Multi Year Accessibility Plan (owned by Human Resources & Loss Prevention)	Proposed Implementation Date	Legislated Date
<ul style="list-style-type: none"> ● Workplace Emergency Response process for staff 	January 1, 2013	January 1, 2013
<ul style="list-style-type: none"> ● Recruitment – notify employees and public regarding availability of accommodation 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> ● Notify applicant – availability of accommodation upon request for assessments and selection process 	January 1, 2016	January 1, 2016

<ul style="list-style-type: none"> Inform employees of policies regarding job accommodations 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> Providing accessible formats and communication supports available to perform job 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> Have a documented Individual Accessibility Plan (IAP) 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> Have a Return to Work process 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> Performance Management takes into account accessibility needs 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> Career Development and Advancement process to take into account accessibility needs 	January 1, 2016	January 1, 2016
<ul style="list-style-type: none"> Redeployment process takes into account accessibility needs 	January 1, 2016	January 1, 2016

<u>PUBLIC SPACES</u> Deliverables on Multi Year Accessibility Plan (owned by Store Construction and Building Maintenance)	Proposed Implementation Date	Legislated Date
<ul style="list-style-type: none"> Incorporate the Design of Public Spaces on newly developed outdoor public use eating areas, outdoor play spaces, exterior paths of travel, accessible parking and service related elements 	January 1, 2017	January 1, 2017
<ul style="list-style-type: none"> Provide maintenance and restoration of public spaces 	January 1, 2017	January 1, 2017
<ul style="list-style-type: none"> Develop procedures for preventative and emergency maintenance of accessible elements in public spaces 	January 1, 2017	January 1, 2017
<ul style="list-style-type: none"> Develop procedures for dealing with temporary disruptions when accessible elements under public spaces are not working 	January 1, 2017	January 1, 2017
<ul style="list-style-type: none"> Report on Public Spaces every three years 	January 1, 2020	January 1, 2020