



AODA PLAN AND POLICY
Last updated: December 2015

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STATEMENT OF COMMITMENT

411 Local Search corp. (“411.CA”) is committed to improving the lives of our customers and staff and to ensure a just society. Part of this commitment includes fulfilling its obligations under the AODA to allow all customers and staff to have an equal opportunity to participate in company activities. 411.CA’s ongoing commitment to this process includes a shared responsibility amongst the leaders in the company to ensure the desired outcomes are achieved. 411.CA expects all staff, customers, volunteers, vendors, service providers and participants to contribute to a barrier free environment that is inclusive of all individuals.

2. AODA STEERING COMMITTEE TERMS OF REFERENCE

Background

411.ca is subject to the Accessibility for Ontarians with Disabilities Act (2005). The act outlines a number of compliance requirements and implementation deadlines that 411.ca must adhere to:

- Accessibility Standards for Customer Service
- Information and Communication Standard
- Employee Standard
- Accessible Built Environment Standard

Some of the requirements will result in an overlap of responsibilities amongst departments within the organization. It is important to coordinate the efforts of 411.CA to avoid duplication of work and to ensure that 411.CA is compliant with the standards set out in the AODA.

Mandate

The Steering Committee will oversee the strategic directions for implementation standards that are in compliance with the AODA. This will include providing oversight and support to working groups in order to facilitate the program. The Committee will guide decision-making regarding any operational and structural changes that are required within the context of implementing the AODA.

Specific Duties

The Steering Committee will:

- Review and approve an annual plan to support the implementation of the compliance requirements of the AODA
- Develop and oversee the communication strategy for compliance within the AODA
- Ensure the participation of required stakeholders throughout the process
- Oversee the completion of any required Government Reports

The VP Corporate Controller and Administration will take on the role of ensuring compliance with the AODA and will work in coordination with the Department of Information Technology to provide guidance on the AODA requirements and other initiatives.

Meetings

The Steering Committee will meet as necessary, but not less than, bi-monthly to ensure the implementation of compliance requirements.

Membership

The Steering Committee will be made up of the following. Additional members or knowledge experts will be added as necessary to ensure 411.CA meets its commitments to this process.

VP Corporate Controller and Administration (Chair)

Human Resources Generalist

Employee representative from the department of I.T

3. CUSTOMER SERVICE STANDARD

In order to meet 411.CA's obligation with the Customer Service Standard as outlined in the AODA, the Organization facilitated a training module for staff that provide services to the customers of the Company. Follow up continues to ensure new staff is getting trained on the AODA Customer Service Standard. 411.CA will ensure that the development of a tracking process is in place within the required timeframe outlined in the AODA.

4. INFORMATION AND COMMUNICATIONS STANDARD

411.CA will need to meet its obligations under the Information and Communications Standard. This will include the creation of new processes to help ensure accessibility of communications that are distributed online or in print. Some of the potential process improvement requirements include: web accessibility standards, accessible information and communication policy guidelines, and alternative methods of providing printed media to those with disabilities. All forms of training that the 411.CA provides will need to be transferred into accessible mediums in order to fulfill the organizations requirements.

5. EMERGENCY PROCEDURE STANDARDS

411.CA will need to ensure it decides upon an appropriate method of transcribing the procedures into accessible formats that can be ready upon request. 411.CA has also developed procedures to meet its obligation to provide individualized employee emergency planning. This planning was included in the Fire Safety Plan that was distributed to staff in 2012. The next step in publicizing these procedures will be ensuring they are placed in publicly accessible areas.

6. EMPLOYMENT STANDARDS

Employment Regulations found within the AODA addresses the requirement for 411.CA to establish a policy that includes a series of procedures to assist employs in areas such as individual workplace accommodation plans, and individualized workplace emergency response information. There is a need to develop performance management and career development plans that take individual accountability needs into account. The development of a multi-year plan also outlines the obligation that 411.CA has to employees through the recruiting process as well as the retirement process.

7. PHYSICAL FACILITIES ACCESSIBILITY

411.CA has taken some steps to ensuring that the Company is in compliance with AODA. Some of the work that has been completed includes:

There will need to be an audit done of the building to ensure that the organization is in compliance with the AODA.

8. AWARENESS

As a Leader in the Community, 411.CA has a responsibility to ensure that our Customers/Staff are aware of the regulations outlined in the AODA. Part of this compliance may include the promotion of events like Mental Health Awareness with our staff and customers.

9. FUTURE CONSIDERATION

The requirements under AODA will affect operations within the Company. The goal is to ensure that 411.CA is in compliance with the regulations found within the legislation. This will include the need to be flexible with budgetary requirements in order to fulfill the obligations outlined in the multi-year plan.

10. MULTI-YEAR ACCESSIBILITY PLAN

JANUARY 2012

Legislative Requirement	Deliverable	Progress to Date
s.27 Individualized workplace emergency response information	Plans, procedures, and protocol developed for employees with disabilities.	Plans developed. Policy created.
s. 13 Emergency procedures available in accessible formats	Ensure emergency procedures information available in accessible formats if requested.	Emergency procedures accessible. Need accessible formatting process.

JANUARY 2013

Legislative Requirement	Deliverable	Progress to Date
s.3 Develop policies outlining how 411.ca will	Accessibility Policies	Completed Policies: Accessible Services,

implement legislation		Accommodation Policy, Harassment Policy, Health and Safety Policy. Web Accessibility Standards, Accessible Communications Policy
s.3 Statement of Organizational Commitment	411.CA Statement on accessibility mandate	Found in Accessibility Policies
s.3 Prepare written document describing policies, make publicly available, and provide them upon request in an accessible format	Policies and Documents Publicly available.	Complete to be posted at reception at office
s.4 Multiyear accessibility plan	Multi-Year plan that is publicly available. Include yearly update	Complete to be posted at reception at office

JANUARY 2014

Legislative Requirement	Deliverable	Progress to Date
s.7 Training on accessibility standards and human rights for all employees. Record all training.	Training to follow AODA standards. Through online training module.	Basic Training on AODA already complete. Need ongoing updated training with logging. Records to be kept of completion
s.11 feedback	Develop process for	Needs development

	members and employers to provide feedback or raise concerns	
s.14 Internet sites to conform to WCAG 2.0 Level A.	All 411.CA websites to conform to WCAG 2.0 Level A Train web developers	Needs development
ss. 22,23,24 Communicate availability of accommodation in recruitment and hiring process.	Policy to address	Included with current recruitment process through posting process. Discuss with all Directors participating in recruitment, selection and orientation process.
s.25 inform employees of policies to support employees with disabilities.	Communicate policies with employees	Needs development
s.26 Accessible formats and communication supports for employees	Provide support within process	In Development
ss. 30,31,32 Accessibility becomes of performance management, career development and redeployment	Consider the needs of employees of disabilities in this process	Need formalized process. Informal process takes into account these considerations

JANUARY 2015

Legislative Requirement	Deliverable	Progress to Date
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s.12 provide accessible formats and communication supports upon request	Develop policy and guide for accessible communications	Needs development
s.12 Publicize availability of accessible formats	Ensure accessible formats and supports are visible and conspicuous to membership	Needs development
s.18 Provide print materials in accessible or conversion ready format upon request	Develop policies, procedures and provisions to this effect	Needs development
s.17 Education Materials to be available in an accessible format	Develop processes	Needs development

ACCESSIBILITY PLANNING APPENDIX CONTENTS

Appendix 1: Employee Emergency Procedures

Appendix 2: Emergency Planning Employee Information Request Form

Appendix 3: Emergency Evacuation Questionnaire for Persons with Disabilities

Appendix 4: DRAFT: Accessibility Policy

Appendix 5: DRAFT: Accommodation Policy

APPENDIX 1

INDIVIDUALIZED EMPLOYEE EMERGENCY PLANNING PROCEDURES

1. The individualized employee emergency request form is distributed annually and upon commencement of employment with 411.CA through the following methods:
 - a. The request form is sent out to all employees of 411.CA by email.
 - b. The request form is sent out to all out of scope staff including directors, managers, and officers requesting information on whom they are aware of that may require an individualized emergency plan.
 - c. The template is found in Appendix 2 within this document.
2. The Department of Human Resources receives notification of an employee requesting to be accommodated due to a disability.
3. The Human Resources department maintains the confidentiality of all information and requests provided in this process. In order to ensure the safety of the individual(s), a list is generated and given to the Emergency Fire Prevention Committee Chair. The Fire Prevention Committee Chair familiarizes themselves with the workspaces of the individuals to support emergency planning.
4. The Fire Prevention Committee Chair and the Human Resources Generalist then develop an emergency plan with the individual. The plan is put into writing using the template found in this document (Appendix 3)
5. The emergency plans are stored with the fire safety plan. In the event of an emergency the first responders are directed to check the fire safety plan.
6. First responders utilize the emergency plan to ensure the safety of individuals.

APPENDIX 2

TEXT FOR EMERGENCY PLANNING MASS COMMUNICATION EMAIL

Dear 411.CA Staff,

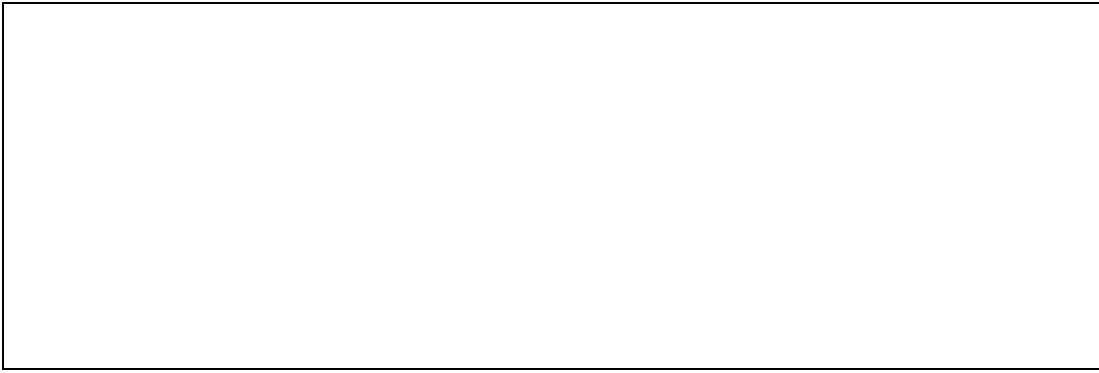
411.CA attempts to ensure the safety of all employees while in the workplace. In order to support this endeavour, individualized emergency evacuation plans for persons with disabilities may be required. We request that any employee with disabilities who requires emergency information, instruction or assistance during an emergency evacuation fill out the attached request for to provide us with the necessary information. This information is being collected by Human Resources and will be shared with the Fire Prevention Committee Chair in order to facilitate emergency planning.

If you require support in ensuring your form is completed correctly please do not hesitate to contact Human Resources at ext. 320

Thank you.

Request form for people with disabilities who require individualized emergency plans:

EMERGENCY PLANNING	
First Name:	Last Name:
Department:	
Do you have a disability and require emergency information, instruction or assistance with emergency evacuation? (please circle your answer)	Yes No
If you have indicated you require emergency information, instruction or assistance during an emergency evacuation, Human Resources will be in contact with you. Please provide your extension and email address. Please also consider providing your personal cell phone or home phone number.	



APPENDIX 3

EMERGENCY EVACUATION QUESTIONNAIRE FOR PERSONS WITH DISABILITIES

Name:

Do you require special assistance in an emergency including any equipment, medication or device?

Please describe:

Primary Office Location

Office:

Office Number:

Department:

Methods of Contact

Telephone:

Cell:

Email:

Other:

Emergency Contact Person

Name:

Telephone:

Cell:

Email:

Special Notes/Considerations:

APPENDIX 4

Accessibility Policy

This Policy is available in alternate formats upon request.

1. Background

This policy has been created to ensure that 411.CA meets its obligations to comply with the requirements of the AODA Customer Service Standard and to communicate what persons may expect from 411.CA in regards to this standard. The policy is intended to benefit persons with disabilities as defined in the Ontario Human Rights Code. 411.CA strives to provide the services it delivers to all individuals regardless of disability. 411.CA ensures the services are provided in a manner that respects the dignity and independence of persons with disabilities. 411.CA is committed to ensuring it provides its services in quality accessible formats and that it provides such services, to the extent possible, in a timely manner.

This Policy applies and should be read in conjunction with other related policies that support the 411.CA compliance with the AODA.

2. Assistive devices

411.CA is committed to serving persons with disabilities who use assistive devices to obtain, use or benefit from its services. 411.CA will ensure that adequate training on assistive devices is provided to all individuals with disabilities.

3. Use of service animals and support persons

Persons with disabilities may bring their service animals to areas within 411.CA offices that are open to the public or third parties. 411.CA will ensure all staff who may come to contact with individuals who may bring service animals are trained to accommodate such occurrences.

Individuals who require to be accompanied by a support person will be allowed access to all requested 411.CA services. Support Persons who may be required to communicate confidential information, discussions, and or settlements may be required to sign the

documents with embedded confidentiality statements. 411.CA will help facilitate payment arrangements for specialized support persons when they are required. Specialized support person may include, but is not limited to, sign language interpreters, real time captioners, and attendants.

4. Communication

411.CA will accommodate persons with disabilities by utilizing effective communication means that enable persons with disabilities to use, receive and requests services and good.

411.CA will train necessary staff on how to interact and communicate with persons with various t411.caes of disabilities.

5. Feedback process

Feedback about this Policy or its implementation can be submitted:

- In person at 411.CA Human Resources office 3rd floor (1200 Eglinton Ave E Suite 300 ON M3C 1H9), Monday-Friday, 9:00 am-5:00 pm; or
- By mail to 1200 Eglinton Ave E Suite 300 ON M3C 1H9
- Online through email by sending feedback to: shasan@411.ca

411.CA will review all feedback and take action where necessary to improve accessibility to services and goods. Feedback received will be redirected to an appropriate 411.CA representative.

Where possible, complaints will be addressed immediately. However, some complaints may require more effort to address, and must be reviewed for action, possibly involving a number of elements within the Company. 411.CA will respond to and follow up on all feedback provided, in an accessible format requested by the complainant, within a reasonable time frame.

6. Notice of temporary disruptions

411.CA will provide notices that will be placed at all entrances to 411.CA offices when there are temporary disruptions to facilities that may prevent persons with disabilities from accessing the services provided by the organization.

The notice will outline the nature of the disruption, a timeline on how long the disruption is expected to last, and, where possible, a list of alternative services that are available.

This notice will be provided in accessible formats upon request.

7. Training

411.CA will provide training to all staff, volunteers, service providers, contractors, and others as applicable on accommodating individuals with disabilities.

Training will occur on an ongoing basis and whenever changes are made to relevant policies, practices and procedures. Training will be provided to each person as soon as practicable after he or she is assigned applicable duties.

APPENDIX 5

Reasonable Accommodation Policy

This policy describes how 411.CA will meet its responsibilities with regard to reasonable accommodation. 411.CA is actively committed to the principles of equality, diversity and inclusion in the workplace, including the establishment of employment practices that ensure that there are no discriminatory barriers that interfere unreasonably with employment opportunities.

The Ontario Human Rights Code defines disability in Section 10(1). The Code requires that persons whose disabilities preclude them from fulfilling the essential duties or requirements of their jobs, or who cannot meet bona fide and reasonable occupational requirements be accommodated with respect to employment unless the accommodation causes 411.CA undue hardship.

Accommodation in employment enables the employee to perform the duties and fulfill the requirements of the job and to participate in all development and career opportunities. Changes to the work environment will be made to allow for the use of the skills of an employee with a disability in order that the essential requirements of the job may be met.

In order for any accommodation to be successful the person with the disability also have a responsibility to be cooperative in finding an appropriate accommodation.

The following statement takes into account 411.CA accessibility policy which includes its mission and the requirement of the Ontario Human Rights Code, 1990, which calls for the reasonable accommodation of employees and applicants for employment with a disability.

PURPOSE

The purpose of this policy is to:

- Provide a clear statement of the obligations and responsibilities required under: the Accessibility for Ontarians with Disabilities Act (AODA), and any other relevant legislation, and 411.CA accommodation process,

- To recognize the obligations of employees in the accommodation process, and
- To provide guidance and standards for the implementation of this Policy.

SCOPE

The policy applies to all employees and applicants for employment who have a disability requiring accommodation.

DEFINITIONS

Accommodation:

An adaptation or adjustment made to enable a person with a disability to perform the essential duties or requirements of the position. The requirement, qualification or factor must be reasonable and bona fide in the circumstances. Examples of accommodation include:

- Workstation and/or minor office modifications
- Temporary alternative work
- Flexible or alternative work schedules
- Temporary rehabilitative assignments (return to work)
- Temporary relocation from an area where environmental sensitivity resulting in illness that is medically

Essential requirements:

The core functions of a job, including productivity (both in terms of the amount of work product and the timeliness of the work product) and the importance of any function.

Disability

Disability (as defined in the Ontario Human Rights Code Section 10 (1))(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device, (b) a condition of

mental impairment or a developmental disability, (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language, (d) a mental disorder, or (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

POLICY

1. Accommodations assist in the inclusion of persons with disabilities into employment activities.
2. Individuals are to be accommodated in ways which respect their dignity.
3. Accommodation is to be made only for those disability related needs disclosed by the employee or applicant which impact on employment.
4. Accommodation needs are to be addressed in a way that is consistent with responsible financial management and operational requirements, and does not pose an undue hardship on 411.CA.
5. Accommodation requirements are determined on person-by-person basis by ensuring that each employee with a disability is considered, assessed and accommodated individually, while maintaining a process that is consistent with the principles of confidentiality, to the degree possible, and shared responsibility.
6. The accommodation process requires the involvement and co-operation of the employee who requires the accommodation.
7. 411.CA is committed to achieving a culture and work environment that is supportive of employees with disabilities. In accordance with these principles, reasonable accommodation will be made on a case by case basis to meet the specific needs of employees and applicants, and systemically to make the 411.CA as a whole accessible to employees and applicants with disabilities.

IMPLEMENTATION

1. In order to secure appropriate accommodation, employees with disabilities are responsible for identifying their individual needs to their manager and (assisted as appropriate by the employee's bargaining agent) working with the manager to develop and implement an accommodation plan.
2. Employees with disabilities who request accommodation must provide their manager with relevant professional supporting documentation as determined by 411.CA, generally from a regulated health professional practitioner (e.g., a

physician, psychiatrist, clinical psychologist). The documentation must include a statement that the individual has an ongoing, recognized disability that requires accommodation and must specify the resulting limitations to the performance of the employee's job. 411.CA has a right to request a separate medical opinion.

3. If needed to clarify the accommodation requested or the adjustment in work tasks, the employee must be willing to sign consent to release to the Human Resources Department relevant accommodation information for the disabling condition in question.
4. This policy encourages dialogue between managers and employees as to how the needs of individuals can be accommodated within the terms of the legislation and 411.CA guidelines. All such dealings require mutual understanding and respect from the parties involved in the accommodation process.
5. Where possible, the employing Department is expected to carry the cost of any accommodation. If the Department is unable to carry the cost of the accommodation, the Manager or Director will contact Human Resources for guidance.
6. The parties involved may seek advice at any time from the Human Resources Department, which may also provide assistance for communicating the situation to others in the workplace.

The purpose of reasonable accommodation is to enable a person to perform at least the essential requirements of the job as defined in the job posting and/or job description relating to that job. 411.CA is not required to create a job or so significantly alter a job as to have a different job in order to accommodate an applicant or an employee.