

Circus World Displays Limited
Accessibility for Ontarians With Disabilities Act (AODA)
Multi-Year Accessibility Plan

Part 1: General Requirements				
Initiative	IASR Requirement	Action	Status	Compliance Date
1.1 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 under the accessibility standards referred to in this Regulation.	<ul style="list-style-type: none"> • Developed Accessibility Policies and posted on the CWD website and team member notice boards. Also available on company shared drive, which was communicated through email. 	Completed	January 1, 2014
1.2 Accessibility Plans	<p>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"> • Designated Human Resources Generalist as team lead in achieving compliance under AODA. • To develop Accessibility Plan, identified barriers through research into best practices and interviews with Management team. • Will review Accessibility Plan again before January 1, 2019. 	Completed	January 1, 2014

<p>1.3 Training</p>	<p>Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all team members, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<ul style="list-style-type: none"> • Assessed training needs for each team member based on job descriptions. • Determined format to deliver each form of training (third party provider for customer service training, resources from Access Forward for Accessibility law training, resources from Ontario Human Rights Commission for training on the Human Rights Code. • Training is mandatory, and all forms are available online. • Training incorporates accessible formats. • Ongoing tracking of team member training in personnel files. 	<p>Completed</p> <p>In progress</p>	<p>January 1, 2012 (Customer Service)</p> <p>January 1, 2015 (All other training)</p>
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Part 2: Information and Communications Standards

Initiative	IASR Requirement	Action	Status	Compliance Date
<p>2.1 Feedback</p>	<p>Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</p>	<ul style="list-style-type: none"> • Conducted assessment of current feedback mechanisms. • CWD accepts customer and team member feedback in a variety of ways, including by email, by phone, by fax, in person or on comment cards available. • As needed, update current process for requesting accessible formats – including alternative methods of feedback if what is in place or is available doesn't meet 	<p>In progress</p>	<p>January 1, 2015</p>

		the needs of the individual.		
2.2 Accessible Formats & Communication Supports	<p>2.2.1 Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons</p>	<ul style="list-style-type: none"> • Review current process for requesting accessible formats and communication supports. • As needed, update current process for requesting accessible formats – including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual. • Develop communications for informing team members and the public on the availability of and process for requesting accessible formats and communication supports. 	In progress	January 1, 2016
	2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • Research different accessible formats and communication supports that are available to better consult on requests for accessible formats. • Develop a process for responding to requests for accommodation. 	In progress	January 1, 2016
	2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports	<ul style="list-style-type: none"> • Develop language for job postings, the CWD website, offer letters and internal bulletin board material to advise that accessible formats are available on request. 	In progress	January 1, 2016
2.3 Accessible Websites & 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	<ul style="list-style-type: none"> • Conduct assessment of web functionality to determine gaps in WCAG guidelines. • Update website to WCAG 2.0 Level A. • Plan for future update to WCAG 2.0 Level AA. 	<p>Completed</p> <p>In progress</p>	<p>January 1, 2014</p> <p>New internet websites and web content on those sites must conform</p>

	increasing to Level AA, and shall do so in accordance with the schedule set out in this section.			with WCAG 2.0 Level A. January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> • success criteria 1.2.4 - Captions (Live) • success criteria 1.2.5 - Audio Descriptions (Pre-recorded)
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Part 3: Employment Standard

Initiative	IASR Requirement	Action	Status	Compliance Date
3.1 Recruitment, General	Every employer shall notify its team members and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	<ul style="list-style-type: none"> • Develop communications for CWD website, internal email and bulletin board postings and job postings that explain the availability of accommodation or applicants with disabilities. 	In progress	January 1, 2016
3.2 Recruitment, Assessment or Selection	3.2.1 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. 3.2.2	<ul style="list-style-type: none"> • Develop information language to use when notifying applicants of an interview letting them know that in accordance with AODA, accommodation is available upon request. • Review recruitment process to ensure barriers may be removed or 	In progress	January 1, 2016

	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.	accessible features provided, upon request in accordance with AODA.		
3.3 Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating team members with disabilities	<ul style="list-style-type: none"> Develop language to incorporate in offer letter regarding CWD's accessibility policies. 	In progress	January 1, 2016
3.4 Informing Team members of Supports	3.4.1 Every employer shall inform its team members of its policies used to support its team members with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an team member's accessibility needs due to disability.	<ul style="list-style-type: none"> Develop email and memo to inform team members of CWD's accessibility policies, plan and processes. 	In progress	January 1, 2016
	3.4.2 Employers shall provide the information required under this section to new team members as soon as practicable after they begin their employment	<ul style="list-style-type: none"> Accessibility policies will be incorporated into the CWD onboarding program 	In progress	January 1, 2016
	3.4.3 Employers shall provide updated information to its team members whenever there is a change to existing	<ul style="list-style-type: none"> Develop processes to communicate any policy changes with CWD team members. 	In progress	January 1, 2016

	<p>policies on the provision of job accommodations that take into account an team member's accessibility needs due to disability.</p>			
<p>3.5 Accessible Formats and Communication Supports for Team members</p>	<p>3.5.1 In addition to its obligations under section 12, where an team member with a disability so requests it, every employer shall consult with the team member 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 team member's job; and</p> <p>(b) information that is generally available to team members in the workplace.</p>	<ul style="list-style-type: none"> • Educate team members on the availability of accessible format and communications supports, in accordance with AODA. • Educate team members on the process for requesting accessible formats and communication supports. • Review current ergonomic assessment process to identify gaps and implement improvements as necessary. 	In progress	January 1, 2016
	<p>3.5.2 The employer shall consult with the team member making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> • Develop a process for consulting with team members to determine accommodation needs. • Develop a process for advising team members of solutions 	In progress	January 1, 2016
<p>3.6 Workplace Emergency Response Information</p>	<p>3.6.1 Every employer shall provide individualized workplace emergency response information to team members 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</p>	<ul style="list-style-type: none"> • Developed email and memo regarding individualized workplace emergency response information. 	Completed	January 1, 2012

	due to the team member's disability.			
	3.6.2 If an team member who receives individualized workplace emergency response information requires assistance and with the team member's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the team member.	<ul style="list-style-type: none"> • CWD's process for creating individualized Workplace Emergency Response information includes a mechanism to obtain consent from the team member to share the information with those designated to provide assistance in the event of an emergency. 	Completed	January 1, 2012
	3.6.3 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 team member's disability.	<ul style="list-style-type: none"> • Upon request, the Human Resources team will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible. 	Completed	January 1, 2012
	3.6.4 Every employer shall review the individualized workplace emergency response information, <p>(a) when the team member moves to a different location in the organization;</p> <p>(b) when the team member's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<ul style="list-style-type: none"> • Individualized Workplace Emergency Response Information plans include guidelines for when plans and information must be reviewed due to a move, or change in accommodation needs. 	Ongoing	January 1, 2012

<p>3.7 Documented Individual Accommodation Plans</p>	<p>3.7.1 Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for team members with disabilities.</p>	<ul style="list-style-type: none"> • Develop an official process for creating documented individual accommodation plans for team members with disabilities. 	<p>In progress</p>	<p>January 1, 2016</p>
	<p>3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an team member requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the team member is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the team member can request the participation of a representative from their 	<p>The document outlining the process for accommodation plans will include:</p> <ul style="list-style-type: none"> • The manner in which the team member can request accommodation • The manner in which a team member requesting accommodation is involved in the development of the Accommodation Plan • Under which circumstances medical assistance is required • The means by which a team member is assessed after an accommodation request is made • How an employee can request the participation of a representative in the process • The process or contacting outside experts to determine if accommodation can be achieved, along with which outside experts should be consulted • CWD's commitment to protecting the privacy and personal information 	<p>In progress</p>	<p>January 1, 2016</p>

	<p>bargaining agent, where the team member is represented by a bargaining agent, or other representative from the workplace, where the team member 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 team member'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 team member.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the team member's accessibility needs due to disability.</p>	<p>of team members during the process</p> <ul style="list-style-type: none"> • The frequency that the accommodation plan will be reviewed and updated • The way that denied requests for accommodation are handled, and the appeals process • The ability to provide the individual accommodation plan in many formats • Develop communications explaining the process for (and availability of) individual accommodation plans in accordance with the AODA. 		
<p>3.8 Return to Work Process</p>	<p>3.8.1 Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its team members who have been</p>	<ul style="list-style-type: none"> • Develop a policy document outlining the return to work process for team members who have been absent from work due to a disability. 	<p>In progress</p>	<p>January 1, 2016</p>

	<p>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>3.8.2 The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of team members who were absent because their disability required them to be away from work; and (b) use documented individual accommodation plans, as part of the process.</p> <p>3.8.3 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>			
3.9 Performance Management	An employer that uses performance management in respect of its team members shall take into account the accessibility needs of team members with disabilities, as well as individual accommodation plans, when using its performance management process in respect of team members with disabilities.	<ul style="list-style-type: none"> • Assess current performance review process to ensure accessibility features are incorporated • Update performance review materials with accessibility in mind 	Beginning in 2015	January 1, 2016
3.10 Career Development and Advancement	An employer that provides career development and advancement to its team	<ul style="list-style-type: none"> • Review of current professional development 	Beginning in 2015	January 1, 2016

	members shall take into account the accessibility needs of its team members with disabilities as well as any individual accommodation plans, when providing career development and advancement to its team members with disabilities.	<p>materials to determine the level of accessibility.</p> <ul style="list-style-type: none"> • Develop all future training and materials with accessibility in mind. • Review promotion criteria, practices and processes take accessibility in mind. 		
3.11 Redeployment	An employer that uses redeployment shall take into account the accessibility needs of its team members with disabilities, as well as individual accommodation plans, when redeploying team members with disabilities.	<ul style="list-style-type: none"> • Review any current guidelines or processes around redeployment to ensure that accommodation plans are incorporated. 	Beginning in 2015	January 1, 2016