



MULTI-YEAR ACCESSIBILITY PLAN

DATE: MARCH 31, 2015
NEXT UPDATE: JANUARY 1, 2020

This multi-year accessibility plan outlines the strategy of Calea Ltd. to prevent and remove barriers and to meet the accessibility requirements under the Integrated Accessibility Standards, O. Reg. 191/11, (the "IASR") made under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

A copy of this multi-year accessibility plan is posted on the websites of Calea Ltd. A copy of this Plan will be provided to any person who requests one.

STATEMENT OF ORGANIZATIONAL COMMITMENT

Calea Ltd. is committed to treating all people in a way that allows them to maintain their dignity and independence. This vision is built upon a foundational belief in integration and equal opportunity. Calea Ltd. is committed to meeting the accessibility needs of people with disabilities in a timely manner. Calea Ltd. is dedicated to breaking down barriers to accessibility, preventing new barriers from arising and to meeting the accessibility requirements prescribed by the AODA.

In accordance with the requirements set out in the IASR, Calea Ltd will:

- Post this plan on its websites (www.calea.ca)
- Provide this plan in an accessible format, upon request; and
- Review and update this plan at least once every five years.

ACTION PLAN

GOALS TO MEET BY JANUARY 1, 2016:

I. Information & Communication

a) Accessible Formats and Communication Supports Regarding Services and Facilities

Calea Ltd. is committed to providing information¹ and communicating in an accessible manner about our services and facilities to people with disabilities.

¹ Only applies to information and communications that Calea Ltd. controls directly or indirectly through contractual relationships. The requirement does not apply to information that Calea Ltd. may share on behalf of another organization.

On request, Calea Ltd. will take the following actions to provide information and communicate in an accessible manner:

1. Use accessible formats and/or communication supports. This may include but not be limited to:
 - text transcripts of visual and audio information
 - reading the written information aloud to the person directly
 - providing a note taker or communication assistant
 - assistive listening systems
 - repeating, clarifying, or restating information
 - accessible electronic formats such as HTML and MS Word
 - large print
2. Consult with the person making the request in a timely manner to determine the most appropriate accessible format or communication support, given the needs of the person, whether the content is convertible and within the capability of Calea Ltd.
3. Provide the accessible format or communication support at no additional cost, in any situation where Calea Ltd. would charge a fee for the information.

This Plan shall be posted on our websites and serves as notice to the public about the availability of accessible formats and communication supports, for persons with disabilities.

Reference: s. 12, IASR

II. Employment

a) Recruitment, Assessment and Selection

Calea Ltd. is committed to providing for fairness and accessibility across all stages of the employment life cycle, including during the recruitment, assessment, and selection process. With respect to recruitment, our goal is to ensure that all potential internal or external applicants are notified about the availability of accommodations, if required, in order to participate in our recruitment processes.

Calea Ltd. will take the following actions to achieve these goals during the recruitment, assessment and selection processes, and when employees are hired:

1. Job postings and/or other appropriate methods will be used to notify potential applicants about the availability of recruitment-related accommodations for disabilities.
2. Job applicants will be notified by telephone or through other means, when they are individually selected to participate in an assessment or selection process, that accommodations are available to support their participation in the assessment or selection process.

3. We will consult with job applicants who request accommodation to provide and/or arrange for effective accommodations to support them through the recruitment, selection and/or assessment process.
4. When offering employment, successful applicants will be notified in writing, in their offer letter, or by other means, of our policies for accommodating employees with disabilities.

Reference: ss. 23-24, IASR

b) Employment Related Accommodations for Employees with Disabilities

Calea Ltd. will inform its employees of the policies used to support 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, by:

1. Providing the information as soon as practicable after commencement of employment and providing updates whenever there is a change to the policies related to job accommodations.
 - The information will be provided using a variety of methods including the company's internal quality management system, emails, staff memos, staff meetings and orientation.

Reference: s. 25, IASR

c) Accessible Formats and Communication Supports for Employees

On request from an employee with a disability, Calea Ltd. will consult with the employee in order to provide them with the accessible formats and communications supports they require to do their jobs effectively and to be informed of information that is generally available to all employees in our workplace such as departmental meeting minutes, policies and bulletins.

Accessible formats and/or communication supports may include but not be limited to:

- text transcripts of visual and audio information
- reading the written information aloud to the person directly
- providing a note taker or communication assistant
- assistive listening systems
- repeating, clarifying, or restating information
- accessible electronic formats such as HTML and MS Word
- large print

Calea Ltd. will consult with the employee making the request in a timely manner to determine the most appropriate accessible format or communication support, given the needs of the employee and the capacity of Calea Ltd. to provide the support.

Reference: s. 26, IASR

d) Individual Accommodation Plans

Calea Ltd. will develop and put in place a written process for the creation of documented individual accommodation plans for employees with disabilities.

Documented individual accommodation plans will be created for employees with disabilities of which we have been made aware; this means when an employee with a disability tells us they have a disability that requires accommodation. Calea Ltd. will also offer assistance and accommodation to an employee who is clearly unwell or perceived to have a disability. The written process will include:

- 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 Calea Ltd. can request an evaluation by an outside medical or other expert, at the expense of Calea Ltd. to determine if and how accommodation can be achieved.
- The manner in which the employee can request the participation of a representative from our 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 the reasons for the denial will be provided to the employee.

If applicable, individualized accommodation plans will include:

- Information regarding accessible formats and communication supports provided to the employee;
- Individualized workplace emergency response information; and
- Any other accommodation provided by Calea Ltd.

Individual accommodation plans will be reviewed and updated so that they remain effective and can be updated, if required. At minimum, plans will be reviewed when:

- An employee changes jobs within our organization;
- The employee's needs for accommodation change because of a recurring or sporadic illness; or
- Our policies and practices change.

Reference: s. 28, IASR

e) Return to Work

Calea Ltd. is committed to supporting employees who return to work after being away for reasons related to their disabilities. In support of this commitment, Calea Ltd. will review its existing policies on return to work and accommodation and update these policies, accordingly.

Calea Ltd. will ensure its return to work process outlines the steps we take to facilitate the return to work of employees who were absent because their disability required them to be away from work and addresses the use of individual documented accommodation plans.

Reference: s. 29, IASR

f) Performance Management

Calea Ltd. will consider the needs of employees with disabilities in its performance management processes. Calea Ltd. will take into account the accessibility needs of employees as follows:

- Review an employee's individual accommodation plan to understand the employee's accommodation needs and determine whether it needs adjusting to improve his or her performance on the job;
- Have documents related to performance management, such as performance plans, available in accessible formats, such as large print for individuals with low vision; or
- Provide informal and formal coaching and feedback in a manner that takes into account an employee's disability, such as using plain language for an individual with a learning disability.

If an employee's responsibilities change as a result of his/her performance review or other performance management process, we will revisit the employee's individual accommodation plan to see if any adjustments are required.

Reference: s. 30, IASR

g) Career Development, Advancement and Re-Deployment

Calea Ltd. will take into account the accessibility needs of its employees with disabilities including the requirements set out in any individual accommodation plans, when providing career development, advancement, or redeployment. This may occur through the consideration of what accommodations employees with disabilities may need to succeed elsewhere within our organization, to take on new responsibilities in a current role, or when redeployment has become necessary.

Calea Ltd. will ensure that individual accommodation plans are reviewed with the employee and adjusted as necessary in order for the employee to take on new responsibilities and/or roles within our organization.

Reference: s. 31, IASR

GOALS TO MEET BY JANUARY 1, 2021:

I. Information & Communication

Calea Ltd. will take steps to make its websites accessible to people with disabilities by conforming to international standards for website accessibility. Unless it is not practicable to do so, the internet websites and web content of Calea Ltd. will conform to WCAG 2.0 Level AA, except for live captioning and pre-recorded audio descriptions. In addition, the website and web content or web-based applications must be controlled directly by Calea Ltd. or through a contractual relationship that allows for modification of our products and to web content published on our websites after January 1, 2012.

Reference: s. 14, IASR

OTHER ACCESSIBILITY MATTERS

I. Design of Public Spaces Standards

At the present time, the Design of Public Spaces Standards contained in Part IV.1 of the IASR does not apply to Calea Ltd.

This Standard applies to organizations that newly construct or re-develop (i.e. make major changes to existing features) public spaces. The Standard would only apply to Calea Ltd. if all of the following criteria were met:

1. Calea Ltd. newly constructed or re-developed a public space;
2. The public space being constructed was included as a “public space” within the Standard; and
3. The construction occurred on or after January 1, 2017.

This Plan would be revised accordingly if current circumstances changed and Calea Ltd. was required to comply with the Design of Public Spaces Standard.

ACHIEVEMENTS & PROGRESS

Calea Ltd. has achieved compliance with the following requirements.

AS OF JANUARY 1, 2012

I. Customer Service Standard

The following measures were implemented by Calea Ltd. to comply with the requirements set out in the Accessibility Standard for Customer Service Regulation, O. Reg. 429/07:

- Development of policies, practices and procedures about providing our services to people with disabilities.
- Establishment of a documented feedback process to receive and respond to feedback from clients and/or the public about how we provide services to people with disabilities, as well as actions that we will take if we receive a complaint.
- Provided training about providing goods and services to people with disabilities.

Copies of Calea Ltd. policies developed and implemented to meet the requirements of the Customer Service Standard are available upon request.

¹ On July 1, 2016 O. Reg. 429/07 was revoked and its content incorporated into the IASR, O. Reg. 191/11.

II. Employment

Calea Ltd. will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and we are aware of the need for accommodation due to the employee's disability. The information will be provided as soon as practicable after learning of the employee's need for the individualized workplace emergency response information.

If the employee's disability is such that they require assistance evacuating the building, our Fire Wardens or other designated employees, will be assigned to assist with the evacuation, as per requirements set out in our existing emergency response and preparedness procedures.

All individualized workplace emergency response information will be reviewed when:

- a. The employee changes location;
- b. The employee's overall accommodation needs and/or plan are reviewed; and/or
- c. Our company's emergency response and preparedness policies and procedures are reviewed.

All information will be communicated to persons designated to assist the employee on an "as needed" basis and in all cases, in a way that respects the privacy of the employee.

Reference: s. 27, IASR

AS OF JANUARY 1, 2015

I. Training

Calea Ltd. provides training to its employees on the requirements of the accessibility standards in the IASR and on the Ontario *Human Rights Code* (the "Code") as it relates to people with disabilities. Our training material includes information about achieving accessibility by 2025 and reviews the requirements of the Information and Communication and Employment standards. The Transportation standards contained in the IASR do not apply to our organization's business. The training material also reviews the requirements under the *Code* and the differences between the *Code* and Integrated Accessibility Standards Regulation.

Calea Ltd. will ensure that prompt and on-going training is provided to all persons who participate in developing our organization's policies. New employees will receive this training as part of the organization's standardized orientation training schedule. In addition, re-training will be provided if our accessibility policies change. All organizations that provide goods, services or facilities on behalf of Calea Ltd. will include relevant training as a condition of service within the written service agreements.

The following actions will be taken to continue to achieve our goals:

1. Training is delivered using on-line training modules appropriate for the audience and needs of Calea Ltd. training may also be delivered using other methods appropriate in the circumstances;
2. Training is scheduled for new employees to receive during orientation and re-training is scheduled accordingly, so that it is provided as soon as practicable if and when accessibility policies change and/or when the employee's role within the organization changes; and
3. Records are maintained detailing which individuals have been trained and on what date.

Reference: s. 7, IASR

II. Information & Communication

Feedback/Comments

Calea Ltd. is committed to ensuring that its processes for receiving and responding to comments (complaints, suggestions, compliments), whether it be from clients, customers or employees, are accessible to individuals with disabilities, on request.

Calea Ltd. has in place, an established customer service process for receiving and responding to comments about the manner in which we provide accessible services to people with disabilities. The process allows for comments in a variety of ways including in person, by telephone, by writing or via email. The process specifies the actions that Calea Ltd. will take when comments, including complaints, suggestions and compliments are received.

Calea Ltd. will ensure that any established processes for employees to provide comments, will be made accessible to individuals with disabilities by providing or arranging for accessible formats and/or communication supports, upon request and in a timely manner.

When an individual requests an accessible format or communication support, Calea Ltd. will consult with the person to determine their accessibility needs and decide on the most appropriate accessible format or communication supports, given the needs of the person and the capability of Calea Ltd. to deliver.

Reference: s. 11, IASR

GOING FORWARD

This accessibility plan will be reviewed and updated at least every five (5) years. Moving forward, our plan will continue to outline our strategies to prevent and remove barriers and meet the requirements set out in the IASR. We will also continue to review our progress and accomplishments as we pursue the core principles of dignity, independence, integration, and equal treatment for all persons.

CONTACT INFORMATION

For more information on this Plan or to request an accessible format of this document please contact the following individual:

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