

GREEN AND SPIEGEL ACCESSIBILITY PLAN

GREEN AND SPIEGEL'S STATEMENT OF COMMITMENT:

Green and Spiegel is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

GREEN AND SPIEGEL'S MULTI YEAR ACCESSIBILITY PLAN

Part I – General Requirements

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) 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.	Policy drafted and approved on November 21, 2014. Policy is reviewed periodically and updated as needed.	Completed	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, <ul style="list-style-type: none"> 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; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years. 	<p>Identifying barriers in the workplace on an ongoing basis.</p> <p>Multi-year plan has been posted on Green and Spiegel's website since 2014.</p> <p>HR and VP of Finance and Administration will review plan periodically and make changes as needed.</p>	Ongoing	January 1, 2014
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to	If applicable, G & S will work with developer of self-serve	Ongoing	January 1, 2014

		the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	kiosks to ensure kiosks are made accessible.		
7	Training	<p>7.(1) 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 employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	Initial training on the Customer Service Standard and the Ontario Regulation 191/11 - Integrated Accessibilities Standards was delivered in 2015 to all existing employees, volunteers, and persons who participate in developing the Firm's policies in classroom and online format. Any new hire will undergo accessibility training for customer training and integrate accessibility standards act through webinar format.	Completed	January 1, 2015

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) 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.	HR will conduct a periodic review of all feedback processes across G & S. Ensure all staff are aware of the need to accommodate upon request and how to do that. This has been integrated into the training on the Integrated Accessibility Standard.	Ongoing	January 1, 2015
12	Accessible Formats & Communication Supports	12.(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, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	Will determine what accessible formats & communication supports we will provide to persons with disabilities upon request (w/in 24 hours if not immediately). Communicate information to staff to ensure everyone is aware of available materials/formats via training on the Integrated Accessibility Standard.	Ongoing	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the	Communicate to staff and management of this requirement via training on	Ongoing	January 1, 2016

		suitability of an accessible format or communication support.	the Integrated Accessibility Standard. Green and Spiegel developed protocol for situations where a suitable agreement cannot be made.		
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Information is available at our reception area and on our website.	Ongoing	January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Emergency Procedures, Plans or Safety information are posted in visible locations around the office. Accessible formats & communication will be provided to persons with disabilities upon request (w/in 24 hours if not immediately).	Completed	January 1, 2012
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and 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, and shall do so in	Any new content or changes made to G & S's website in 2014 will conform to the WCAG 2.0 Level A Standards by December 31, 2014. Moving forward, all contents in the years to come will meet the Level AA standards.	Completed	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.

		accordance with the schedule set out in this section.			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 III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	<p>Green and Spiegel includes a statement in job advertisement, identifies different options for where job advertisements may be posted (e.g., paper, website, bulletin board).</p> <p>Sample Recruitment Statement for Accommodation.</p> <p>We are committed to providing accommodation for persons with disabilities. If you require accommodation, we will work with you to meet your needs throughout the recruitment process.</p>	Ongoing	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>23.(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.</p> <p>(2) 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.</p>	<p>Determine “how” to notify applicants – telephone, email, letter or other alternative means that takes into account their need for accommodation.</p> <p>Continuously identify barriers in the Recruitment process: location of interview room, format of tests (if applicable), room set up for interviewee, interviewing timelines, supports, paperwork.</p>	Ongoing	January 1, 2016

			Developed interview guidelines that takes into account accommodation for persons with disabilities.		
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	All Employment Agreements include a statement confirming that the Firm will support the accessibility needs of its employees.	Ongoing	January 1, 2016
25	Informing Employees of Supports	25.(1) 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.	Policy added to employee handbook and also circulated via email. Communicate in Town Hall meetings and with a follow-up email in regards to any updates/changes to the policy.	Ongoing	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Provide new hires with the Accessibility policies, and review it with them as a part of the onboarding process. New hires will receive mandatory accessibility training as well.	Ongoing	January 1, 2016
25		25.(3)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.	Policy revisions will be updated in the employee handbook and circulated via email.	Ongoing	January 1, 2016

			Communicate updates in Town-Hall meetings with a follow-up email.		
26	Accessible Formats & Communication Supports for Employees	<p>26.(1) In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee 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 employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	Periodically conduct an audit of regular communications in the Firm.	Ongoing	January 1, 2016
26		<p>26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Work in collaboration with employee requesting accommodation to ensure their accessibility needs are met.	Ongoing	January 1, 2016
27	Workplace Emergency Response Information	<p>27.(1) 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>	In the event that the Firm becomes aware of an employee's disability, the Firm will ensure that the employee is provided with information on emergency response protocols that will take into account their individualized requirements.	Ongoing	January 1, 2012

27		27.(2) 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.	With the employee's permission, we will assign designated individuals to ensure emergency response processes are met.	Ongoing	January 1, 2012
27		27.(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 employee's disability.	See 27 (1).	Ongoing	January 1, 2012
27		27.(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	Review individualized workplace emergency response information every year, or as changes occur (i.e. legislation updates, job transfer, etc). We will ensure the individualized emergency response information is updated and communicated to affected employees.	Ongoing	January 1, 2012
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of	Developed a written process for implementing accommodation plans for persons with disabilities.	Completed	January 1, 2016

		documented individual accommodation plans for employees with disabilities.	Created a template to document individual accommodation plans when the need arises.		
28		<p>28.(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 employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee 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 and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 	The elements listed in the Regulation 191/11 shall be incorporated into the Accommodation Plan Process.	Ongoing	January 1, 2016

		<p>5. The steps taken to protect the privacy of the employee'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 employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
29	Return to Work Process	<p>29.(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 employees who have been 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>Developed a written process for implementing a return to work plan for persons with a disability.</p> <p>Created a template to document the return to work process.</p>	Completed	January 1, 2016
29		<p>29.(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of</p>	<p>The elements listed in the Regulation 191/11 shall be incorporated into the Return to Work Process.</p>	Ongoing	January 1, 2016

		employees who were absent because their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.			
29		29.(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.			January 1, 2016
30	Performance Management	30.(1) 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.	Periodically review current Performance Management process. Evaluate different options for administering the performance management process to take into account the individual needs of persons with a disability and consider the different methods to provide feedback to employees – on paper, verbally, on-line, etc. If a person with a disability has an Individual Accommodation Plan (IAP), take into account how information needs to be communicated to these individuals.	Ongoing	January 1, 2016
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the	Periodically review current Succession Plan and Career Development processes and keep	Ongoing	January 1, 2016

		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.	IAP's in mind when making career development and advancement decisions.		
32	Redeployment	32.(1) 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.	Review current Re-deployment processes to take into account the individual needs of persons with a disability as well as any IAP's.	Ongoing	January 1, 2016

PART IV – Design of Public Space Standards

Section	Initiative	Description	Action	Status	Compliance Date
33	Make Exterior Paths of Travel Accessible.	Where new traffic control signal systems with pedestrian control signals are being installed or existing pedestrian control signals are being replaced, the pedestrian control signals must meet the requirements for accessible pedestrian control signals set out in subsection (2). O. Reg. 165/16, s. 15 (1).	Where practicable, GANDS will request from building owners that new, and redeveloped exterior paths of travel that are outdoor sidewalks or walkways designed and constructed for pedestrian travel and are intended to serve a functional purpose (includes stairs, ramps, curb ramps, depressed curbs, pedestrian signals, rest areas) and not to provide a recreational experience meet certain technical requirements in accordance with the provisions of the IASR.	Ongoing	January 1, 2017

34	Make Parking Accessible.	Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.	Where practicable, GANDS will request from building owners that new, and redeveloped parking areas meet certain technical requirements in accordance with the provisions of the IASR.	Ongoing	January 1, 2017
35	Obtaining Service – Make Service counters, Queuing Guide and Waiting Areas Accessible	Obligated organizations shall meet the requirements set out in this Part in respect of the following: <ol style="list-style-type: none"> 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas O. Reg. 413/12, s. 6. 	Where practicable, GANDS will request from building owners that all indoor or outdoor newly constructed service counters and fixed queuing guides and all newly constructed or redeveloped waiting areas will conform to all of the required elements in accordance with the provisions of the IASR.		
36	Maintain the Accessible Parts of Our Public Spaces.	In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following: <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part. 2. Procedures for dealing with temporary disruptions when accessible elements required. 	GANDS will continuously identify preventative and emergency maintenance procedures & alternatives & procedures for handling disruptions and alternatives in accordance with the provisions of the IASR.	Ongoing	January 1, 2017

GREEN AND SPIEGEL ACCESSIBILITY POLICIES (CUSTOMER SERVICE STANDARD & INTEGRATED ACCESSIBILITY STANDARDS) ARE AVAILABLE UPON REQUEST. THE POLICIES AND MULTI-YEAR ACCESSIBILITY PLAN ARE AVAILABLE IN ACCESSIBLE FORMAT UPON REQUEST.

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