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<b>TITLE:</b>	AODA Accessibility Policy and Multi-Year Accessibility Plan		
<b>FACILITY:</b>	Starfield-Lion, Toronto	<b>REVISION:</b>	<b>1</b>
<b>ISSUED BY:</b>	Corporate Counsel	<b>REVISION DATE:</b>	May 23, 2019
<b>REVISED BY:</b>		<b>APPROVED BY:</b>	President
<b>ISSUE DATE:</b>	May 6, 2019	<b>PAGE:</b>	1 of 8

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## **Statement of Starfield-Lion's Commitment to Accessibility and compliance with the *Accessibility for Ontarians with Disabilities Act (AODA)***

Starfield-Lion is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

### **General Provisions**

#### **Accessibility Policy and Multi-Year Accessibility Plan**

This AODA Accessibility Policy and Multi-Year Accessibility Plan outlines a phased-in strategy to comply with the current and future requirements of the AODA and/or the Regulation. Starfield-Lion will report annually on the progress and implementation of the plan, post the information on our website and will provide it in alternative formats upon request. This AODA Accessibility Policy and Multi-Year Accessibility Plan will be reviewed at least once every five years.

### **Information and Communications**

#### **Accessible Formats and Communication Supports**

Starfield-Lion is committed to meeting the communication needs of people with disabilities. We will communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information and communications materials in accessible formats or with communication supports. This includes publicly available information about our goods, services and facilities, as well as publicly available emergency information.

## **Website Accessibility**

Starfield-Lion will also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) website requirements initially at Level A and increasing to Level AA, in accordance with the Integrated Accessibility Standards.

## **Emergency Information**

If Starfield-Lion prepares emergency procedures, plans or public safety information and makes the information available to the public (which it does not currently do), we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

## **Feedback**

Starfield-Lion has processes in place for receiving and responding to feedback from the public and will ensure that those processes are provided in accessible formats and with communication supports, upon request. We will notify the public about the availability of accessible formats and communication supports.

# **Employment**

## **Hiring**

Starfield-Lion will notify the public and staff that, when requested, we will accommodate disabilities during recruitment and assessment processes and when people are hired. We will notify staff that supports are available for those with disabilities.

If a selected applicant requests an accommodation, Starfield-Lion shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability, except where to do so would cause undue hardship.

When making offers of employment, Starfield-Lion will notify successful applicants of its policies for accommodating employees with disabilities.

## **Employee Notification**

Starfield-Lion 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:

- As required to new employees as soon as practicable after they begin their employment; and
- 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.

## **Talent and Performance Management**

Starfield-Lion's performance management, career development and redeployment processes will take into account the accessibility needs of employees.

## **Communication of Policies, Accessible Policies and Communication Supports**

Starfield-Lion will consult with people with disabilities to determine their information and communication needs. Policies will be communicated through the company intranet, Lion's Den, as well as by regular staff meetings, accessible bulletin boards, and through interpersonal communication with employees.

In addition and where an employee with a disability requests it, Starfield-Lion will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

Starfield-Lion will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **Individualized Accommodation Plans (IAPs)**

Starfield-Lion shall have in place a written process for the development of a documented Individual Accommodation Plan for each employee with a disability in accordance with the following principles:

- The employee's participation in the development of the IAP;
- Assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- The Company may request an evaluation by outside medical or other expert, at our expense, to assist with determining accommodation and how to achieve accommodation;
- The employee may request the participation of a representative from the workplace in the development of the accommodation plan;
- The Company will take steps to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided; and
- Identification of any other accommodation that is to be provided.

### **Return to Work Process**

Starfield-Lion will develop and document a process for writing return to work plans. We will consult with employees in need of return to work plans. Return to work plans will be developed collaboratively by the employee and their manager and will state:

- The worker's name and title or department
- The manager or supervisor's name, and title or department
- When the return to work process should start and end
- The plan should also list:
- Any limitations the worker now experiences
- All job functions involving those tasks
- Accommodations that would allow the worker to perform each function, such as:
  - Modified schedule or location
  - Modified job requirements or tasks exchanged with colleagues

- Any assistive device(s) the worker uses
- Any arrangements that will ensure the worker's safety
- Start and end dates if any of these arrangements are temporary

## **Training**

Starfield-Lion is committed to training staff on Ontario's accessibility laws and on accessibility aspects of the Human Rights Code that apply to persons with disabilities. Training will be provided in a way that best suits the duties of employees and other staff members. Paper copies of this policy and associated forms will be available to all employees and it will also be available on Lion's intranet site.

The primary basic training for non-supervisory employees will be reviewing this policy and associated procedures and forms, reviewing a handout that provides an overview of the Integrated Accessibility Standards and by way of the Ontario Human Rights Commission's 20-minute training, which also covers both OHRC and AODA entitled Working Together: The Code and the AODA, or its equivalent.

We will train existing staff, and new employees upon hire. Where needed, employees in management and supervisory roles will receive additional training. All training will be documented included when the training occurred, the training information presented, and who presented the training information. We will conduct new training if there are changes to this policy, or the associated procedures and forms.

## **Workplace Emergency Response Information**

Starfield-Lion 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;
- If the employee who receives individual Workplace Emergency Response Information requires assistance and with the employee's consent, the Company shall provide the workplace emergency information to the person designated by the Company to provide assistance to the employee;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and
- Review the individualized Workplace Emergency Response Information when the employee moves to a different location within the Ontario organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.

## **Self-Service Kiosks**

Starfield Lion does not use or provide self-service kiosks.

## **Design of Public Spaces**

Starfield-Lion does not currently have public spaces within the meaning of the AODA. To the extent that such spaces are acquired in the future, we will incorporate accessibility into Starfield-Lion's public spaces that are newly constructed or redeveloped on and after January 1, 2017. We will ensure that we follow the requirements stated under the Design of Public Spaces Standards (Accessibility Standards for the Built Environment). We shall also provide, within our contractual

obligations and capabilities, restoration and maintenance of Starfield-Lion's public spaces by ensuring our AODA Accessibility Policy and Multi-Year Accessibility Plan includes procedures for preventative and emergency maintenance of accessible elements in Starfield-Lion's public spaces and procedures for dealing with temporary disruptions when accessible elements required under this section are not in working order.

## **Accessible Customer Service**

Starfield-Lion remains committed to servicing all individuals, including customers with disabilities. Starfield-Lion will implement an accessible customer services policy, including providing the required training to applicable employees. A copy of this policy will be posted where it is likely to come to the attention of Starfield-Lion's customers. The Customer Services policy will be provided in a manner that considers the individual's disability, upon request.

## **Changes to Existing Policies**

We will modify or remove an existing policy that does not respect and promote the dignity and independence of people with disabilities.

### **For More Information**

For more information on this accessibility plan, please contact Loren Lori at 416-789-4354, [llori@lionprotects.com](mailto:llori@lionprotects.com);

[www.Lionprotects.com](http://www.Lionprotects.com)

Standard and accessible formats of this document are free on request from Loren Lori at 416-789-4354, or [llori@lionprotects.com](mailto:llori@lionprotects.com)

**EXHIBIT A: ACCESSIBILITY ACTION PLAN AND TIMELINE**

General Deliverables	Completed?	Legislated Date for Large Employers
<b>Policies &amp; Procedures</b>		
Implement Customer Service Policy		January 1, 2012
Make Customer Service Policy available to the Public		January 1, 2012
Make Customer Service Policy available in alternative formats upon request		January 1, 2012
Implement Accessibility Policy that includes a Statement of Organizational Commitment	Yes	January 1, 2014
Post Accessibility Policy on the Company's website	Yes	January 1, 2014
Make Accessibility Policy available in alternative formats upon request	Yes	January 1, 2014
<b>Accessibility Plan - Multi Year</b>		
Develop Accessibility Plan	Yes	January 1, 2014
Make available to the public	Yes	January 1, 2014
Make available in alternative formats upon request	Yes	January 1, 2014
Review every 5 years	N/A	Ongoing
<b>Training</b>		
Train all applicable employees and contractors in accordance with the Customer Service requirements		January 1, 2012
Train all Ontario employees & volunteers, policy developers, those providing goods or services on behalf of the Company regarding IAS and <i>Human Rights Code</i> .		January 1, 2015
<b>Information &amp; Communications</b>	<b>Completed?</b>	<b>Legislated Date for Large Employers</b>
<b>Emergency Information</b>		
Emergency Procedure Plans or Public Safety Information are inventoried and accessible upon request	Yes	January 1, 2012
<b>Feedback</b>		

Feedback process is in place for receiving and responding to feedback - system is in place and available in accessible formats and with communication supports upon request	Yes	January 1, 2015
<b>Accessible formats and communication supports</b>		
Provide or arrange for accessible formats and communication supports upon request (timely manner, at a cost that is no more than the regular cost charged to other persons)	Yes	January 1, 2016
<b>Website Accessibility</b>		
New Internet Website WCAG 2.0 Level AA (other than closed caption Live pre-recorded audio) (where new post-2014)		January 1, 2014
All internet websites and web content WCAG 2.0 Level AA		January 1, 2021
Review all content on website up to 2012 to ensure everything is accessible		January 1, 2021
<b>Employment</b>	<b>Completed?</b>	<b>Legislated Date for Large Employers</b>
Develop Personalised Workplace Emergency Response for staff, on consent and as necessary	Yes	January 1, 2012
Notify employees and public regarding availability of accommodation	Yes	January 1, 2016
Notify applicant of availability of accommodation upon request for assessments or selection process	Yes	January 1, 2016
Inform employees of policies regarding job accommodations	Yes	January 1, 2016
Providing accessible formats and communication supports available to perform job	Yes	January 1, 2016
Have a documented (IAP) in place		January 1, 2016
Have a Return to Work Process in place		January 1, 2016
Ensure performance management processes take into account accessibility needs	Yes	January 1, 2016
Ensure career development and advancement information takes into account accessibility needs	Yes	January 1, 2016
Ensure redeployment process takes into account accessibility needs	Yes	January 1, 2016

Public Spaces	Completed?	Legislated Date for Large Employers
<b>Design of Public Spaces</b>		
Incorporate accessibility regulations in accordance with any contracts relating to our premises as required by the Design of Public Spaces Standard for new developments, redevelopments, or when making major changes to existing space or service related elements	N/A	January 1, 2017
Maintain and repair public spaces within our premises	N/A	January 1, 2017
Develop procedures for preventative and emergency maintenance of accessible elements in public spaces	N/A	January 1, 2017
Develop procedures for dealing with temporary disruptions when accessible elements under public spaces not working	N/A	January 1, 2017
Incorporate accessibility regulations in designing newly constructed service counters and fixed queuing guides	N/A	January 1, 2017
Identify accessible parking space immediately adjacent to Totalcare entrance		N/A (target date of July 1, 2019)

In addition to the above, Starfield-Lion has:

- Reviewed our physical space for elements that create barriers to accessibility and identified areas that may be addressed with our landlord in the future when building improvements are requested.
- Reviewed policies and practices that were barriers to hearing-impaired persons. During the integration of our hearing-impaired employees we engaged outside services to train our supervisors and other employees regarding best working practices with respect to their needs. New practices were introduced to eliminate communications barriers for hearing-impaired employees.
- Introduced Skillsoft on-line training for use as our corporate training and learning system. The Skillsoft platform uses captions in all of its training so that hearing-impaired persons are able to use it effectively.