

Multi-Year Accessibility Plan 2014 to 2018

THIS DOCUMENT IS AVAILABLE IN ALTERNATE FORMATS UPON REQUEST

Statement of Commitment

Statement of Organizational Accessibility Commitment

Highland Farms is committed to the principles outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* and to meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the Act.

Complying with the Accessibility Standards for Customer Service Regulation

Highland Farms has been in compliance with the Accessible Customer Service Standards Regulation since 2012. We continue to ensure that in our day-to-day activities, we fulfill all the requirements of this

Regulation in keeping with the principles of dignity, independence, equality and integration. For example:

- Highland Farms ensures that all new staff receive training on the requirements of the Regulation, with particular emphasis on how to serve and communicate with all people
- We welcome feedback in person, by mail or email, by telephone and by fax. The public is also encouraged to provide feedback using the Highland Farms website.

Complying with the 2012 Requirements of the Accessible Employment Standards Regulation

Highland Farms meets the requirements of Section 27 of Accessible Employment Standards within the IASR. Under this section, we are required to provide individualized workplace emergency response information to employees who have a disability. If the employee requires assistance in case of an emergency, and consented to have information about his or her accommodation needs shared, Highland Farms will provide the workplace emergency response information to the person designated by Highland Farms to provide assistance to the employee.

- Highland Farms employees have been notified of our commitment to work with them to create individual workplace emergency response information. The availability of accommodations is communicated to all employees on a regular basis. Alternate formats are used if required by specific employees. Our respectful process ensures privacy for people who self-identify as needing accommodation.

Meeting our Accessibility Commitment Going Forward

Introducing the Highland Farms Five-Year Accessibility Plan

- This Five-year plan was created to comply with Section 4 of the Integrated Accessibility Standards Regulation, which requires large organizations like Highland Farms to establish, implement, maintain and document a multi-year accessibility plan by January 1, 2014.
- In 2017 there are new requirements related to exterior paths of travel; accessible parking; obtaining services, and maintaining accessible parts of our public spaces under the Design of Public Spaces Regulation. We are also required to continue to comply with the Accessible Customer Service Standards.
- Much of our work in 2018 will be to ensure that we maintain our accessibility practices and fine-tune them to align with feedback. When the Accessible Built Environment Standards become law, we will integrate our strategies for any requirements that apply to Highland Farms into a revised version of our Five-year Accessibility Plan.

Our Detailed Plan: Strategies and Milestones

2014

A Snapshot of Accessibility Progress in 2014

This year Highland Farms will ensure that it continues to comply with existing accessibility requirements under both the Accessibility Standards for Customer Service Regulation and the IASR. We will also come into compliance with the General Requirements of the IASR to create an accessibility policy for the IASR and our first multi-year accessibility plan. In addition, beginning January 1, 2014 new websites and content on those sites will be compliant with WCAG 2.0 Level A.

Accessibility Standards for Customer Service Regulation

In 2014 and every year of the Plan and beyond, Highland Farms will continue to ensure that it is in compliance with the Accessibility Standards for Customer Service Regulation. More specifically:

- Highland Farms continues to provide accessible customer service training to every person who deals with members of the public or who participates in developing our policies, practices and procedures governing the provision of goods and services to the public; including all associates, contractors and others who provide service on behalf of Highland Farms.
- Highland Farms continues to gather feedback on the goods and services it provides and acts on that feedback to improve services to people with disabilities
- Highland Farms continues to post appropriate notices regarding service disruptions.
- Highland Farms continues to ensure that any new policies that are created regarding customer service are consistent with the principles of dignity, independence, integration and equal opportunity.
- Highland Farms continues to welcome people with disabilities who use assistive devices such as support persons or service animals, and we train our staff on assistive devices use in our facilities.
- Highland Farms provides prior notice of a fee for a support person where and if it is charged.

Integrated Accessibility Standards Regulation (IASR)

General Requirements

Accessibility policy

Section 3 of the Regulation requires large organizations to develop, implement and maintain policies governing how they achieve or will achieve accessibility requirements by January 1, 2014. Section 3

also requires private sector organizations to have a statement of commitment and to use reasonable efforts to make their policies consistent with the principles of dignity, independence, integration and equal opportunity.

Five-year Accessibility Plan

Section 4 of the IASR requires large organizations to create a multi-year plan by January 1, 2014. We are also required to post a copy of our policies and plans on our website and provide alternate formats upon request.

Highland Farms has met these requirements before the deadline.

- A policy for the Integrated Accessibility Standards Regulation is included in Appendix 1 of this Plan. It is available on our website and in alternate formats on request.
- Our commitment to accessibility is part of our accessibility policies and this Five-year Accessibility Plan: it includes goals which encompass the principles of dignity, independence, integration and equal opportunity.
- We have completed the Five-year Accessibility Plan before the due date of January 1, 2014.
- This Five-year Accessibility Plan are posted on our website. Print copies and alternate formats are available on request.

Self Service Kiosks

Highland Farms will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

Information and Communication Standard

Accessible Websites and Web Content:

Beginning January 1, 2014, all new internet websites or websites undergoing a major refresh, and web content on those sites conform to Web Content Accessibility Guidelines or WCAG at the 2.0A level.

- A review of the current and pending websites has been conducted to determine the level of accessibility provided
- Web developers and web content providers have been trained on WCAG in relation to their duties
- Internal expertise is being developed for on-going accessibility for all internet websites and content

2015

A Snapshot of Accessibility Progress in 2015

2015 is the year that large organizations like Highland Farms must ensure that employees and volunteers are trained on the IASR and Human Rights Code. We must also ensure that our feedback processes are accessible to persons with disabilities and provided in accessible formats and communication supports on request.

IASR General Requirements

Highland Farms will provide training on the accessibility standards referred to in this Regulation and on the Human Rights Code. The training will target every person who deals with members of the public or who participates in developing Highland Farms' policies, practices and procedures governing the provision of goods and services to the public; including all associates, contractors and others who provide service on our behalf by January 1, 2015.

- Highland Farms will provide the required training to its employees as appropriate to the duties of that employee.
- Highland Farms will maintain records of training including the dates and number of trained people.
- New employees and volunteers will receive training on the Accessibility Standards for Customer Service Regulation, on the IASR and on the Human Rights Code during their orientation period.

Accessible Information and Communications Standard

Feedback:

Section 11 of these Standards requires, by January 1, 2015, that all our feedback processes be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports on request. Highland Farms must also notify the public about the availability of accessible formats and communication supports.

- Highland Farms and its other lines of business accepts feedback through its website and those other means as required
- Alternate formats are available on request for all feedback forms.

2016

A Snapshot of Accessibility Progress in 2016

By January 1, 2016 all of Highland Farms' Employment practices must be accessible. While many of our existing employment practices already meet requirements under the Accessible Employment Standards, we ensure that all our employment practices throughout the employment life cycle meet these standards of accessibility. We are also required to provide or arrange for information in accessible formats and communication supports for persons with disabilities on request.

Information and Communication Standard

Accessible Formats and Communication Supports:

Section 12 of the IASR requires, by January 1, 2016, that all large organizations provide or arrange for information in accessible formats and communication supports for persons with disabilities on request. Highland Farms will ensure that requested information is:

- Provided in a timely way
- Provided at no extra cost
- Provided following consultation with the person making the request to determine the most appropriate format or support

Accessible Employment Standard

Highland Farms will ensure compliance with the 2012 requirement to provide employees with individualized emergency response plans. New employees with accommodation needs will develop individual emergency accommodation plans with their managers. Revisions will be made to the plans for existing employees if their accommodation needs change.

Other requirements for this standard come into effect for Highland Farms by January 1, 2016. Highland Farms will ensure that it has met these requirements by that date and has complied with the intent of this standard to ensure accessibility is incorporated into the entire employment life cycle.

Recruitment:

In compliance with Sections 23 and 24,

- Highland Farms notifies its employees and the public about the availability of accommodations for applicants with disabilities during the interview process.
- Highland Farms will notify successful applicants of its policies for accommodating employees with disabilities when offering employment. This notice will be included when the job is offered to the successful applicant.

Informing Employees with Disabilities of Supports available to them:

In compliance with Section 25,

- Highland Farms will inform all employees of its policies for supporting employees with disabilities, including providing employment-related accommodations. Information will be provided through newsletters, staff memos, email and staff meetings.
- New employees will receive this information during the on-boarding process
- All employees will be given updated information whenever there is a change to existing policies on the provision of job accommodations.
- Employees will be assured that their privacy is respected and that any sharing of information about their accommodation needs will be discussed with them and plans for communication made with their consent.

Accessible Formats and Communication Supports for Employees:

In compliance with Section 26,

- Highland Farms will consult with employees who have disabilities to provide them with the accessible formats and communication supports they require to do their job effectively.

Individual Accommodation Plans

In compliance with Section 28,

- Highland Farms will have in place a written process for the development of documented individual accommodation plans for employees with disabilities, including the following elements,
 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 assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
 4. The manner in which the employee can request the participation of another representative from the workplace, (Highland Farms employees are not represented by a bargaining agent) in the development of the accommodation plan;
 5. The steps taken to protect the privacy of the employee's personal information;
 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee; and
 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
- Highland Farms' individual accommodation plans will,
 1. If requested, include any information regarding accessible formats and communications supports provided

2. if required, include individualized workplace emergency response information; and
3. Identify any other accommodation that is to be provided.

Return to Work

In compliance with Section 29,

- Highland Farms has a process for the provision of accommodations where needed when an employee returns to work. (Accommodation Policy- Temporary)
 1. Human Resources evaluates and approves the current return to work process
 2. Modified work or specific accommodations may be provided
 3. Talent Development coordinates the appropriate Return to Work training as required.
- Highland Farms will formally document this process in compliance with Section 29 of these standards.

Performance Management and Career Development

In compliance with Sections 30 and 31,

- Highland Farms will review the accessibility needs of employees with disabilities with regard to: performance management and career development – in ways that take their accessibility needs into account, including performance plans in accessible formats as well as coaching and feedback.

2017

A Snapshot of Accessibility Progress in 2017

2017 marks a jump forward in our accessibility progress. When building new or making major changes to existing public spaces larger organizations like Highland Farms must meet applicable requirements under Section 80 of the IASR related to public spaces for exterior paths of travel, accessible parking, obtaining information, and maintenance of accessible public spaces. There are no new requirements under the IASR or the Accessible Customer Service Regulation for this year for our organization. Highland Farms will continue to comply with all requirements described earlier in this plan.

Design of Public Spaces Standard

Exterior Paths of Travel

Highland Farms ensures,

- All technical requirements for structures that are connected to, provided on, or provided along exterior paths of travel are met, including:
 - Ramps
 - Stairs
 - Curb Ramps
 - Depressed Curbs
 - Rest Areas

Accessible Parking

Off-Street Parking: Highland Farms ensures,

- At least two parking spaces are provided for the use of persons with disabilities
- An additional two percent of parking spaces are provided for the use of persons with disabilities
- Parking spaces for the use of persons with disabilities are evenly distributed between wider Type A parking spaces and standard Type B parking spaces
- Type A and B spaces meet all technical requirements
- Parking spaces for the use of persons with disabilities are distributed in a manner that provides substantially equivalent or greater accessibility in terms of distance from an accessible entrance

Access Aisles: Highland Farms ensures,

- Access aisles that allow persons with disabilities to get in or out of their vehicles are provided for all parking spaces for the use of persons with disabilities
 - Access aisles may be separate or shared by two parking spaces
- Access aisles meet all technical requirements

Signage: Highland Farms ensures,

- Parking spaces for the use of persons with disabilities are distinctly indicated by an accessible permit parking sign
- Type A parking spaces are further indicated as “van accessible”
- Signage meets all technical requirements

Obtaining Services

Service Counters: Highland Farms ensures,

- At least one service counter is accessible to people who use mobility aids.
- Service counters are low enough for someone sitting in a mobility aid.
- Service counters have sufficient clear space for someone sitting in a mobility aid, including space for the person's knees.
- Accessible service counters are identified with accessible signage.

Waiting Areas: Highland Farms ensures,

- Within waiting areas with seating fixed to the floor at least three percent of seating is accessible to someone using a mobility aid.
- All waiting areas have at least one accessible seating space.

Maintenance

Highland Farms ensures,

- Our Multi-year Accessibility Plan includes preventative and emergency maintenance procedures for the accessible parts of our public spaces, including posting of regular maintenance schedules and letting people know about alternatives.
- Procedures for handling temporary disruptions in service when an accessible part of our public spaces stops working are added to the Plan.

2018

A Snapshot of Accessibility Progress in 2018

There are no new requirements for our organization for 2018. Our Five-year Accessibility Plan will expire this year. Therefore we will prepare a new multi-year plan to begin in 2019.

We Welcome Your Feedback

Contact Us:

We're here to help!

Have a fresh idea that could make your Highland Farms experience even more enjoyable?

We'd love to hear from you.

Call us at **905-501-9545**. If you require the Relay Service please call **1-800-855-0511** and provide our phone number for the operator to make the call.

Or visit the "*contact us*" link on our website, www.highlandfarms.ca/; fill out your first name, last name and email address, along with your question and we'll get back to you in a timely manner!