



# Ontario Accessibility Policy and Multi-Year Plan

Compliance requirement for the  
AODA's Integrated Accessibility  
Standards Regulation ("IASR")

**Accessibility is a Commitment**  
by all levels of our organization

**Accessibility is about Diversity**  
in our workforce, tenants, service providers and customers

December 19, 2019



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## **Executive Summary**

### **Accessibility Policy & Multi-year Accessibility Plan**

The following policy and plan has been established by First Capital Real Estate Investment Trust ("FCR") to comply with the standards set forth in Regulation 191/11, "Integrated Accessibility Standards" (IASR) under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

### **Commitment to Persons with Disabilities**

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

### **Accessibility Council**

FCR has established an internal Accessibility Council which is composed of members from various departments of the company and is responsible for coordinating efforts to ensure that FCR is compliant with its obligations under the AODA. This Council also works to inspire leadership through the services provided by FCR including:

- helping with accessibility related issues both with internal employees & external customers & clients, vendors
- supporting and promoting FCR accessibility tools and guides
- supporting or coordinating other initiatives, as shown throughout this document
- developing FCR accessibility standards and practices

### **Accessibility Plan**

FCR has developed a Multi-Year Plan that describes how FCR intends over time to become a more accessible organization and sets forth the principles of how FCR provides service to and otherwise interacts with people with disabilities. The Plan will be posted on the company website, reviewed and updated periodically by the Accessibility Council, at a minimum once every five years and will be provided in an accessible format upon request.

### **Training**

FCR will continue to provide training to Ontario employees on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of staff members.

FCR will take the steps to ensure staff in Ontario are provided with training needed, as soon as practicable, to meet Ontario's accessibility law.

New employees will be trained as part of the New Hire On-boarding process. This will include Customer Service Standards (CSS) and the new IASR & Human Rights training.

## **Kiosks**

FCR will ensure the needs of people with disabilities are considered when and if designing, procuring, or acquiring self-service kiosks by January 1, 2014.

## **Information and communications**

FCR is committed to meeting the communication needs of people with disabilities. We will, upon request, consult with people with disabilities to determine their information and communication needs.

## **Accessible Format and Communication**

### **Feedback**

FCR will, upon request, take steps for all publicly available information in Ontario to be made available in accessible formats for persons with disabilities, in a timely manner that takes into account the person's accessibility needs due to a disability. FCR will consult with the person making the request in determining the suitability of an accessible format or communication support.

### **Accessible Website and Web Content**

FCR will take the necessary steps to make any new websites and web content on those sites, that we directly or indirectly control through a contractual relationship, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0,

- Level A by January 1, 2014, except where it is impracticable and
- Level AA by January 1, 2021, except where it is impracticable

## **Employment**

FCR is committed to fair and accessible employment practices and will take steps to notify applicants and employees that accommodations are available upon request, to people with disabilities during the recruitment, selection and assessment process and for the duration of employment with FCR.

FCR will implement and put in place a process for developing individual accommodation plans and return-to-work policies for employees in Ontario that have been absent due to a disability.

Steps will be taken by January 1, 2016 to ensure the accessibility needs of employees with disabilities are taken into account during performance management, career development & redeployment processes:

- Upon request, employees with disabilities will have an individual accommodation plan developed by Human Resources in consultation with the employee. The plan will include consideration for performance management, career development and redeployment processes.

## **Design of Public Spaces**

FCR will meet the accessibility standards for the Design of Public Spaces when building or making major modifications to public space in Ontario by January 1, 2017. In the event of disruption to the accessible parts of public space, FCR will notify the public of the service disruption and alternatives available.

Public Spaces include:

- Outdoor paths of travel, such as sidewalks, ramps, stairs, curb ramps, rest areas;
- Accessible off street parking;
- Service related elements such as service counters, fixed queuing lines and waiting areas.

## **Contact Information**

85 Hanna Avenue, Suite 400  
Toronto, Ontario  
M6K 3S3

Email: [accessibility@fcr.ca](mailto:accessibility@fcr.ca)

Telephone: 416.504.5114

## Appendix A - Multi-year Accessibility Plan

SECTION 1 - Integrated Accessibility Standard Regulation ("IASR"): General Requirements			
Requirement of Accessibility Standards	Compliance Date	Actions to Meet Requirement	Status
<b>O. Reg 191/11 IASR 13(1-2)</b> Organizations that prepare organizational emergency procedures, plans and public safety information and make that information available to the public, shall provide that information in an accessible format via accessible communication supports as soon as practicable upon request	1-Jan-12	<ul style="list-style-type: none"> <li>Developed process and procedures</li> </ul>	Complete
<b>O. Reg 191/11 IASR 27(1-4)</b> Individualized workplace emergency response information must be provided upon request and in an accessible format when need is articulated. Individualized workplace emergency response information shall be reviewed when: <ul style="list-style-type: none"> <li>Employee moves to a different location in the organization</li> <li>Employee's overall accommodation needs or plans are reviewed and when the employer reviews general emergency response policies</li> </ul>	1-Jan-12	<ul style="list-style-type: none"> <li>Developed process and procedures</li> <li>Create emergency response planning template</li> <li>Inform staff of emergency response assistance</li> <li>Create specific plans for each individual staff member with a disability if required</li> </ul>	Ongoing
<b>Accessibility policy IASR 3(1-4)</b> <ul style="list-style-type: none"> <li>Develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting the applicable legislative requirements</li> <li>Make policy publically accessible</li> <li>Provide policy in accessible formats upon request</li> </ul>	1-Jan-14	<ul style="list-style-type: none"> <li>Develop, implement and maintain policy</li> <li>Publish on FCR external website.</li> <li>Provide contact email address to request policy in accessible formats and embed this in the policy</li> </ul>	Ongoing  Complete Complete
<b>Accessibility Plan IASR 4(1-4)</b> <ul style="list-style-type: none"> <li>Establish, implement and maintain a multi-year accessibility plan outlining the organization's strategy to prevent and remove barriers and meet requirements under AODA legislation</li> <li>Post plan on website if one exists</li> <li>Provide plan in accessible formats upon request</li> <li>Prepare an annual status report on the progress against the plan and post on website</li> <li>Review periodically, no less than once every 5 years</li> </ul>	1-Jan-14	<ul style="list-style-type: none"> <li>Develop, implement and maintain plan</li> <li>Publish on FCR external website.</li> <li>Report on status of plan annually</li> <li>Review plan every 5 years</li> </ul>	Complete  Complete Ongoing Ongoing
<b>Procurement IASR 5(1-3)</b> <ul style="list-style-type: none"> <li>Obligated organizations shall incorporate accessibility features when designing, procuring or acquiring self service kiosks</li> <li>If the organization deems it not practical to do so in any instance, it must be prepared to provide an explanation supporting that assessment</li> </ul>	1-Jan-14	Review procurement & design procedures <ul style="list-style-type: none"> <li>Establish Accessibility criteria for technical &amp; structural features of kiosks as well as physical access, software &amp; interface as per Non Website Based WCAG 2.0</li> </ul>	Ongoing

## Appendix A - Multi-year Accessibility Plan (continued)

SECTION 1 - Integrated Accessibility Standard Regulation ("IASR"): General Requirements			
Requirement of Accessibility Standards	Compliance Date	Actions to Meet Requirement	Status
<b>Training IASR 7(1-6)</b> <ul style="list-style-type: none"> <li>• Provide training on the requirements of the Ontario accessibility standards as referred to in the regulation and related legislation (i.e. Human Rights Code)</li> <li>• Train employees as soon as practicable</li> <li>• Provide training in respect to any changes to accessibility policies</li> <li>• Maintain record of training provided (including dates on which training is conducted) and the number of individuals trained</li> </ul>	1-Jan-15	Prepare training development plan <ul style="list-style-type: none"> <li>• Train staff on General Requirements, Information and Communication Standard as appropriate and in relation to their roles and responsibilities (examples include: accessible web info, accessible print info, how to create in house accessible documents and PDFs, alternate formats and their uses)</li> </ul>	Ongoing

## Appendix A - Multi-year Accessibility Plan (continued)

SECTION 2 - Integrated Accessibility Standard Regulation ("IASR"): Information and Communication			
Requirement of Accessibility Standards	Compliance Date	Actions to Meet Requirement	Status
<b>Feedback Mechanism IASR 11(1-4)</b> <ul style="list-style-type: none"> <li>Any processes by which the organization receives and responds to feedback must ensure this process is accessible, as well as provide accessible formats and communications supports upon request</li> <li>Organizations must notify the public about the availability of these accessible formats and communication supports</li> </ul>	1-Jan-15	<ul style="list-style-type: none"> <li>Determine what accessible formats and communication supports we will provide upon request</li> <li>Ensure that staff and management are aware of the requirement to provide accessible formats and communication supports upon request in a timely manner</li> </ul>	Ongoing
<b>Accessible formats and communication supports IASR 12(1-4)</b> <ul style="list-style-type: none"> <li>Upon request, provide or arrange for accessible formats and communication supports for persons with disabilities in a timely and appropriate manner and at a cost that is no more than the regular cost charged to other persons</li> <li>Consult with requestor in determining the suitability of an accessible format</li> <li>Post notice to public on external FCR website of the availability of accessible formats</li> </ul>	1-Jan-15	<ul style="list-style-type: none"> <li>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request in a timely manner and what, if any costs may apply</li> </ul>	Ongoing
<b>Websites IASR 14(1-7)</b> New websites, web content(published after January 1, 2012), and web-based applications must conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 as per the following: <ul style="list-style-type: none"> <li>By January 1, 2014, all new websites and web content on those sites must conform with WCAG 2.0 Level A, except where not practicable</li> <li>By January 1, 2021 all websites, web content and web-based applications must be WCAG 2.0 Level AA, except where not practicable</li> </ul>	1-Jan-14  1-Jan-21	<ul style="list-style-type: none"> <li>Website accessibility audit provider engaged</li> <li>Compliance will be incorporated into any new website project management</li> </ul>	Ongoing



## Appendix A - Multi-year Accessibility Plan (continued)

SECTION 3 - Integrated Accessibility Standard Regulation ("IASR"): Employment			
Requirement of Accessibility Standards	Compliance Date	Actions to Meet Requirement	Status
<b>Accommodation- Recruitment IASR 22</b> <ul style="list-style-type: none"> <li>Notice shall be provided to employees and public about the availability of accommodation for applicants with disabilities during the recruitment process</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Review and, as necessary, modify existing recruitment, assessment and selection procedures and processes</li> <li>Update job posting templates and career section of website to ensure they notify applicants of the availability of accommodation upon request</li> </ul>	Ongoing
<b>Accommodation- Selection IASR 23(1-2)</b> <ul style="list-style-type: none"> <li>Accommodation shall be provided to applicants selected to participate in assessment or selection process, upon request</li> <li>Suitable accommodation shall be provided in a manner that takes into account the applicant's accessibility needs</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Notify all applicants that accommodations are available during the recruitment and hiring process on request, by specifying same in job postings and on the careers section of the corporate website</li> <li>Establish a standard process to receive, assess and consult with any applicant who requests an accommodation to ensure their needs are met</li> <li>Train Human Resources staff and all service providers in reference to these requirements</li> <li>Provide hiring managers with training and job aids as required supporting the provision of accessible recruitment, assessment, and selection processes</li> </ul>	Ongoing
<b>Notice to successful candidates IASR 24</b> <ul style="list-style-type: none"> <li>When extending an offer of employment, FCR shall notify the successful applicant of FCR's policies for accommodating employees with disabilities.</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>When making offers of employment, FCR shall notify the successful applicant of FCR policies for accommodating employees with disabilities</li> </ul>	Ongoing
<b>Accommodation notice for all employees IASR 25(1-3)</b> <ul style="list-style-type: none"> <li>Accommodation Policy shall be provided to all employees and updates provided whenever changes are made</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Inform current and new employees of the policies used to support to employees with disabilities and policies to accommodate their accessibility needs due to disability</li> <li>Notify employees of all policy changes in a timely fashion</li> </ul>	Ongoing  Ongoing
<b>Accessible formats and communication supports for employees IASR 26(1-2)</b> <ul style="list-style-type: none"> <li>Alternate formats provided to employees with disabilities upon request including information required to perform the employee's job</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Provide accessible formats and communications supports for its employees as required</li> <li>Consult with the employee in deciding what formats or communications supports are suitable</li> </ul>	Ongoing  Ongoing

## Appendix A - Multi-year Accessibility Plan (continued)

SECTION 3 - Integrated Accessibility Standard Regulation ("IASR"): Employment			
Requirement of Accessibility Standards	Compliance Date	Actions to Meet Requirement	Status
<ul style="list-style-type: none"> <li>Consult with the employee making the request in determining the suitability of an accessible format</li> </ul>			
<b>Documented individual accommodation plans IASR 28(1-3)</b> <ul style="list-style-type: none"> <li>Develop and maintain a written process for the development of individual accommodation plans for employees with disabilities</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Develop procedures for documenting and updating individual accommodation plans for employees with disabilities and the method by which a copy of the plan will be provided to the employee in that format that takes his or her needs into account.</li> </ul>	Ongoing
<b>Return to work process IASR 29(1-3)</b> <ul style="list-style-type: none"> <li>Develop and maintain a return to work process for its employees who have been absent from work due to disability and require accommodation in order to return to work</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Review, modify and document existing return to work processes for employees who have been absent due to disability and will require accommodation in order to return to work</li> </ul>	Ongoing
<b>Performance Management IASR 30(1-2)</b> <ul style="list-style-type: none"> <li>Performance management processes shall take into account the accessibility needs of its employees with disabilities in addition to their individual accommodation plans when using its performance management process</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Review and modify relevant current policies and make updates as required to ensure accessibility needs and individual accommodation plans are taken into account</li> </ul>	Ongoing
<b>Career Development and advancement IASR 31(1-2)</b> <ul style="list-style-type: none"> <li>Career development and advancement processes will take into account accessibility needs of its employees with disabilities</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>Verify that existing and future training and development service providers are equipped to deliver services in an accessible manner</li> </ul>	Ongoing
<b>Redeployment IASR 32(1-2)</b> <ul style="list-style-type: none"> <li>Redeployment/Reassignment processes will take into account accessibility needs of employees with disabilities and individual accommodation plan</li> </ul>	1-Jan-16	<ul style="list-style-type: none"> <li>FCR will take into account the accessibility needs of employees with disabilities when redeploying employees, where redeployment processes exist</li> </ul>	Ongoing

## Appendix A - Multi-year Accessibility Plan (continued)

SECTION 4 - Integrated Accessibility Standard Regulation ("IASR"): Design of Public Spaces			
Requirement of Accessibility Standards	Compliance Date	Actions to Meet Requirement	Status
<p>O. Reg. 413/12</p> <p>Standard applies to public spaces that are newly constructed or redeveloped on or after January 1, 2016. The standard applies to all new construction or major renovations being designed for the following facilities or elements:</p> <ul style="list-style-type: none"> <li>• Outdoor public eating areas</li> <li>• Exterior paths of travel</li> <li>• Accessible Off-street parking</li> <li>• Service counters and Waiting areas (indoor and outdoor)</li> </ul>	1-Jan-16	<p>Modify FCR Standard Design Guidelines to ensure that newly constructed or redeveloped facilities in Ontario:</p> <ul style="list-style-type: none"> <li>• Meet Ontario Building permit application requirements</li> <li>• Include design criteria &amp; standards to meet accessibility standard requirements and embed requirements in development planning process</li> </ul>	Ongoing