

AODA Multi-Year Accessibility Plan

Initiative	ISAR Requirement	Action	Responsible	Compliance Date
Part 1 – General Requirements <ul style="list-style-type: none"> Develop accessibility policies and a multi-year accessibility plan Report annually on the progress of the multi-year plan Ensure staff and volunteers have been trained on the Integrated Accessibility Standards Regulation (IASR) and the Ontario Human Rights Code 				
1.1 Establishment of Accessibility Policies	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.	<ul style="list-style-type: none"> Establish Integrated Standards Policy 	Completed by HR Department	January 1, 2014
1.2 Accessibility Plans	Large organizations shall, (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	(a) develop a multi-year accessibility plan that meets the current requirements of the IASR (b) Summitt Energy’s accessibility plan will be posted on our external website & will be provided upon request in an accessible format (c) Summitt Energy will comply by the AODA requirements by reviewing our accessibility plan minimum once every 5 years	Completed by HR Department & Executives Completed by Marketing Department Will be executed by HR Department	January 1, 2016 May 11, 2016
Self Service Kiosks	Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	At this time self-service kiosks are not in use. Should this status change, Summitt Energy will ensure compliance with the AODA.	Completed by HR Department if Required	
1.3 Training	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,	<ul style="list-style-type: none"> Assess training needs (e.g., separate training for managers and employee levels) Review current training to determine how ISAR training requirements could be implemented to develop 	In progress by HR Department	

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	<p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization’s policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>additional training to educate staff and managers on AODA legislation, ISAR and Human Rights Code</p> <ul style="list-style-type: none"> • Determine vehicle to deliver training (e.g. online or group sessions) • Training will incorporate accessible format upon request • Training will be provided to all employees, volunteers, contractors and third parties acting on behalf of Summitt Energy • Training will be tracked & recorded in employee file 		
<p>Part 2 – Information and Communication Standards</p> <ul style="list-style-type: none"> • Accessible websites & web content • Accessible feedback process • Accessible formats and communication supports 				
2.1 Feedback	<p>Ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communication support upon request.</p>	<ul style="list-style-type: none"> • Ensure Summitt Energy website incorporates an on-line feedback process fully accessible in other formats, upon request • As needed, update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn’t meet the needs of the individual • Develop understanding of current accessible formats, information and communication and technology tools available at Summitt Energy to adequately respond to requests for accessible formats that take into consideration the requestor’s disability needs 	<p>Completed by HR & Marketing Departments</p> <p>Completed by HR Department upon request</p> <p>Completed by HR Department & Marketing Department</p>	<p>May 11, 2016</p>
2.2 Accessible Formats & Communication Supports	<p>Upon request provide or arrange for the provision of accessible formats and</p>	<ul style="list-style-type: none"> • As needed, update current process for requesting accessible formats– including alternative methods of 	<p>To be completed by HR Department upon request</p>	<p>January 1, 2016</p>

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	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	feedback if what is in place or is available doesn’t meet the needs of the individual • Develop communication strategy for educating Summitt Energy staff on the availability of and process for requesting accessible formats and communication supports	Completed by HR Department	May 11, 2016
	2.2.2 Consult with the person making the request in determining the suitability of an accessible format or communication support.	• Understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual’s disability needs	Completed by HR Department upon request	May 11, 2016
	2.2.3 Notify the public about the availability of accessible formats and communication supports.	• Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request	Completed by HR & Marketing Department	May 11, 2016
2.3 Accessible Websites & Web Content	Make Summitt Energy website 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 accordance with the schedule set out in this section.	• Conducted an assessment of current web functionality to ensure compliance and adequacy of accessibility features • Ensure Technology and Content Owners (IT and Marketing) are aware of ISAR requirements for existing web content	Completed by Marketing & IT Departments	May 11, 2016 New internet websites and web content on those sites must conform with WCAG 2.0 Level A January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded).
Part 3 – Employment Standards <ul style="list-style-type: none"> • <i>Recruitment, assessment and selection</i> • <i>Accessible formats and communication supports for employees</i> 				

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<ul style="list-style-type: none"> • <i>Workplace emergency response</i> • <i>Return to work processes</i> • <i>Performance management, career development and redeployment</i> 				
3.1 Recruitment, General	Notify employees and the public about the availability of accommodation for applicants with disabilities in recruitment processes.	<ul style="list-style-type: none"> • Existing recruitment policies, procedures and processes reviewed & language incorporated on postings and Summitt Energy career section of website to make applicants aware that in accordance with the AODA, accommodation is available 	Completed by HR Department	May 11, 2016
3.2 Recruitment, Assessment or Selection Process	3.2.1 Review existing recruitment policies, procedures and processes	<ul style="list-style-type: none"> • Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request 	Completed by HR Department	January 1, 2015
	3.2.2 Update recruitment process to ensure applicants who are selected for an interview or assessment, are notified that accommodation is available upon request	<ul style="list-style-type: none"> • Potential candidates are currently advised to inform Summitt Energy if an accommodation is required for an interview 	Completed by HR Department	Ongoing
3.3 Notice to Successful Applicants	When making an offer of employment, notify the successful applicant of policies for accommodating employees with disabilities	<ul style="list-style-type: none"> • Incorporate in offer letter a section regarding Summitt Energy's accessibility policies and where to access additional information 	Completed by HR Department	May 11, 2016
3.4 Informing Employees of Supports	3.4.1 Inform employees of 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.	<ul style="list-style-type: none"> • Create accommodation procedures • Inform employees of policies to support employees with disabilities 	Completed by HR Department	May 11, 2016
	3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> • Accessibility policies and processes to be incorporated in onboarding process for Ontario 	Completed by HR Department	December 31, 2014
	3.4.3 Employers shall provide updated information to its employees whenever there is	<ul style="list-style-type: none"> • Communicate policy changes and/or updates in regards to 	Completed by HR Department	Ongoing

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	a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	accommodation with respect to disabilities		
3.5 Accessible Formats and Communication Supports for Employees	3.5.1 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, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace	<ul style="list-style-type: none"> • Educate employees on the availability of accessible formats and communication supports in accordance with the AODA • Educate employees on the process for requesting accessible formats and communication supports 	Completed by HR Department	December 31, 2014
	3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • Develop a process for consulting with employees to determine accommodation needs • Develop a process for advising employee of solution 	Completed by HR	December 31, 2014
3.6 Workplace Emergency Response Information	3.6.1 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.	<ul style="list-style-type: none"> • Review Summitt Energy's emergency response processes and adjust if necessary to include AODA's requirements in regards to individualized workplace emergency response • Determine via email, who requires individualized help during an emergency situation 	Completed by HR Department	January 1, 2014 & Ongoing
	3.6.2 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.	<ul style="list-style-type: none"> • Once the employees who require individualized emergency response have been determined, Summitt Energy will obtain consent from the applicable employee to share the information with those designated to provide assistance in the event of an emergency 	Completed by Departmental Management & HR Department	Ongoing

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	3.6.3 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.	<ul style="list-style-type: none"> Human Resources will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible 	HR Department	Ongoing
	3.6.4 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	<ul style="list-style-type: none"> Review information when the employee moves to a different location &/or when employee's accommodation needs or emergency response policies are reviewed 	HR Department	Ongoing
3.7 Documented Individual Accommodation Plans	3.7.1 Develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	<ul style="list-style-type: none"> Review current accommodation processes and practices Document individualized accommodation procedures in accordance with AODA 	Completed by HR Department	December 31, 2014 & Ongoing
	3.7.2 The process for the development of documented individual accommodation plans shall include 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 determine if accommodation can be achieved and, if so,	<ul style="list-style-type: none"> Documented plans will incorporate the following elements: <ol style="list-style-type: none"> Manner in which employee can request Under which circumstances medical is required Who (Sunlife & Third Party Benefits Consultant) will be assessing the medical provided - Work with Sunlife & Third Party Benefits Consultant (disability partner) to determine the process for 		Ongoing

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	<p>how accommodation can be achieved.</p> <p>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.</p>	<p>assessing and responding (approve/decline) to individual accommodation plan requests</p>		
	<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>	<p>d) Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (Sunlife & Third Party Benefits Consultant) and what information may be shared</p> <p>e) Communication to the employee will be done via email or formal letter and/or a means of communication that will take into consideration the employee's disability if their request for accommodation is declined or if accepted, the plan in which the accommodation will entail</p> <p>• Train Summitt Energy staff and Managers on the Accessibility policies, processes and procedures for requesting individual plans</p>		
<p>3.8 Return to Work Process</p>	<p>Develop and have in place a return to work process for Summitt Energy employees who have been absent from work due to a disability and require disability-related</p>	<ul style="list-style-type: none"> • Review the current return to work process • Update and document return to work process based on gaps and compliance requirements 	<p>Completed by HR Department & Departmental Management</p>	<p>January 1, 2014</p>

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	accommodations in order to return to work and document the process			
3.9 Performance Management	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.	<ul style="list-style-type: none"> • Assess current performance review processes to ensure accessibility features are incorporated (i.e., assessable forms, conversations in plain text). • Ensure updated/new performance management processes incorporate accessibility features • Ensure training and communication to managers provide awareness on effective communication strategies and timing to allow for employees to review and understand feedback, prior to a meeting 	Completed by HR Department	January 1, 2014
3.10 Career Development & Advancement	Take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to employees with disabilities.	<ul style="list-style-type: none"> • Review current training and professional development materials to ensure accessibility requirements are implemented • Ensure all future training and materials are created with accessibility requirements in mind • Ensure career promotion criteria, practices and processes take into account individual accommodation needs • Track career progression of individuals with disabilities 	Completed by HR Department	January 1, 2014
3.11 Redeployment	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.	<ul style="list-style-type: none"> • Review and update current transfer and redeployment practices and processes to ensure accommodation plans are referenced • Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs 	Completed by HR Department & Department Manager	January 1, 2014