



STATEMENT OF COMMITMENT

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (“AODA”). It is the goal of the Ontario government to make the province accessible by 2025. The Integrated Accessibility Standards Regulations (“IASR”) under the AODA requires that effective January 1, 2014, Old Mill Toronto. (“OMT”) establish, implement, maintain and document a multi-year accessibility plan which outlines OMT’s strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the IASR.

The multi-year plan outlines OMT’s strategy to prevent and remove barriers to accessibility and addresses the current and future requirements of AODA. In addition, this plan allows OMT to fulfill its commitments as outlined in the **OMT- Accessibility Standards for Customer Service Policy**.

In accordance with the requirements set out in the IASR, OMT will:

- Establish, review and update this plan in consultation with persons with disabilities;
- Post the plan on its website;
- Report, as required, on its website on the progress of the implementation of this plan;
- Provide this plan in an accessible format, upon request; and
- Review and update the plan at least once every five years.

ACCESSIBILITY STANDARDS FOR CUSTOMER SERVICE

Commitment:

Since 2012, OMT has been in compliance with the Accessible Customer Service Regulation under the AODA, and will continue to comply with the regulation until all required obligations have been fulfilled.

OMT is committed to excellence in serving all customers, including persons with disabilities, and it will carry out its functions in a manner which delivers an accessible customer service experience.

OMT is committed to treating all people in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under AODA.

Action Taken:

The following measures have been implemented by OMT:

- Ensured that all employees who, on behalf of OMT, deal with the public, and all those involved in the development and approval of customer service policies, practices and procedures, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities.
 - Ensured that staff is trained and familiar with various assistive devices that may be used by customers with disabilities who are accessing OMT for goods or services.
 - Ensured completion of accessibility training is tracked and recorded.
 - Ensured that customers accompanied by a guide dog or support person are accommodated.
 - Welcome feedback from persons with disabilities through multiple communication channels.
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INTEGRATED ACCESSIBILITY STANDARDS REGULATIONS (IASR)**Accessible Emergency Information****Commitment:**

OMT is committed to providing its customers with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities individualized emergency response information when necessary.

Action Taken:

The following measures will be implemented by OMT:

- Individualized workplace emergency response information procedures will be developed for employees with disclosed disabilities, as required.
- Workplace Emergency Response Information forms will be prepared for employees who have disclosed a disability and/or who are being accommodated according to their disability.
- Where required, OMT will provide assistance to specific disabled employees, with the employee's prior consent, to help them evacuate the workplace in case of an emergency. These plans for providing assistance will be set out in individualized emergency plans for said employees.
- On an ongoing and regular basis, and as per the applicable terms of the IASR, OMT will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

IASR Training

Commitment:

OMT is committed to providing appropriate training to its employees on the requirements of the IASR and on the Ontario Human Rights Code as it relates to persons with disabilities. The training will be appropriate to the duties of the employees, volunteers and other persons.

Planned Action:

In accordance with IASR, OMT will take the following steps to ensure that employees are provided with the training needed to meet Ontario's accessibility laws by January 1, 2015:

- Implement a training plan that involves all OMT employees completing the online or classroom style training by January 1, 2015.
- Provide training to employees regarding any changes in accessibility laws that pertain to providing goods or services to the public.
- Include training on accessibility laws for new hires beginning January 1, 2015.
- Keep records of training provided, including dates as well as number of employees trained.

IASR Information and Communication Standards

Commitment:

OMT will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Planned Action:

1. Feedback:

OMT will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by January 1, 2015.

- Ensure that all of our customers are aware the various platforms by which OMT accepts feedback such as:
 - In person
 - By mail, addressed to:
 - General Manager
 - Old Mill Toronto
 - 21 Old Mill Road
 - Toronto, ON
 - M8X 1G5
 - Electronically via our 'contact us' link located at oldmilltoronto.com
 - Via telephone at 416-236-2641 or toll free at 1-866-653-6455

- Ensure that our feedback process is aligned with IASR obligations.
- Ensure our Staff knows to advise customers with disabilities to contact our General Manager with any issues either via the web or telephone.
- Ensure that our oldmilltoronto.com website contains publicly available content that outlines our commitment to AODA and how to best submit feedback.
- Ensure that our feedback process is made available upon request in a manner that accommodates the customer's specific disability.

2. Accessible Formats and Communication Support

OMT will take the following steps to ensure all publicly available information is made accessible upon request by January 1, 2016.

- Provide all publicly available information in various formats to meet the individual needs of customers with disabilities such as: in print, in various font sizes and via our oldmilltoronto.com web site, through our Front Desk, and via our employees by way of verbal communication.
- In addition to the above, OMT is committed to welcome the feedback of such customers with disabilities in order to understand how best to meet their specific needs.

3. Accessible Websites and Web Content

OMT will take the following steps to make all new websites and content on those sites conform with WCAG 2.0, level A by January 1, 2014:

- Committing adequate resources to ensure that the oldmilltoronto.com website, its content and all applications are level A compliant.
- Keep abreast of changes to industry standards when it comes to maintenance of website compliance and implement changes when feasible and necessary.

OMT will take the following steps to make all websites and content conform with WCAG 2.0, level AA by January 1, 2021.

- In partnership with our website designer, create awareness of the obligation to comply with the standard and its impact on customer service.
- Committing adequate resources to ensure that the oldmilltoronto.com website, its content and all applications are level AA compliant.

IASR Employment Standards

Commitment:

OMT is committed to fair and accessible employment practices. This includes providing accessibility across all stages of the recruitment cycle, ensuring that barriers in accommodation and return to work processes are eliminated

and corporate policies surrounding accommodation and return to work are followed, where applicable. OMT is also committed to taking into consideration, the accessibility needs and any accommodation plans of its employees for the purposes of performance management, career development and advancement, and redeployment.

Planned Action:

1. Recruitment:

OMT will take the following steps to notify the public and staff that, when requested, OMT will accommodate people with disabilities during the recruitment and assessment process and when people are hired:

- Will notify job applicants when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to materials or processes to be used.
- If a selected applicant requests an accommodation, OMT will 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.
- Successful applicants will be notified of OMT's policies for accommodating employees with disabilities.

2. Individualized Accommodation/Return to Work Plans

OMT has taken the following steps to develop and implement a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Created an Attendance policy which outlines employee and company obligations as it pertains to absences (due to illness/disability or otherwise) from the workplace;
- Ensure steps are in place to protect the privacy of the employee's personal information.
- Ensure that all significant absences and requests for accommodation are referred to our third party ability management firm for adjudication and for developing, in conjunction with the employee's physician and his/her immediate supervisor, a return-to-work/accommodation plan that is suitable.
- Ensure that our staff is aware of our processes and procedures for ability management and that we offer modified duties to individuals who become ill and/or disabled, temporarily or otherwise.
- If individualized accommodations plans are established ensure that they include individualized workplace emergency response information that is required.

3. Performance Management, Career Development and Redeployment

In accordance with the IASR, OMT will:

Take into account the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, when conducting performance management, providing career development and advancement or when redeploying employees.

PROPOSED ACCESSIBILITY STANDARDS FOR THE DESIGN OF PUBLIC SPACES

Commitment:

OMT will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. Public spaces include:

- Service counters
- Check-out areas
- Outdoor public eating areas
- Parking areas, interior and exterior pathways to our property
- Waiting areas
- Washrooms

If a portion of the property is temporarily unable to offer any particular facilities or services used by customers with disabilities, OMT will make every effort possible to provide public notice of any planned or unexpected interruption to these services. Notices of disruption will be posted conspicuously in the affected location(s) as soon as it is feasible to do so and will include information about the reason for the disruption, its anticipated duration and the description of alternative option, if available. In the event of a planned disruption, the affected location(s) will provide at least 48 hours' notice by posting the notice described above.

Planned Action:

OMT will take the following steps to ensure new public spaces are designed in such a way to meet the Accessibility Standards for the Design of Public Spaces by January 1, 2017:

- Create awareness of the Accessibility Standards for the Design of Public Spaces.
- Ensure that accessibility standards are incorporated into any major renovations established beyond January 1, 2015.