

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

GNC CANADA INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Accountability / Actions	Compliance Date
3	Establishment of Accessibility Policies	3.(1) 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.	Policy completed and in compliance with integrated accessibility standards under AODA	Completed
4	Accessibility Plans	4.(1) 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. d)	Implemented and posted Multi-Year Accessibility Plans in compliance with the regulation. Posted accessibility Plans (Customer Service, AISR and Multi Year Plan) on www.gnc.ca website. Partner with IT/Web developers for future website updates Review and update this plan at least once every five years	Completed & Ongoing
7	Training	7.(1) Every obligated organization shall 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, (a) all employees, and volunteers; (b) all persons who participate in developing the organization’s policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	Ensure that required training pertaining to the AODA regulation and on the Ontario Human Rights Code is provided to all persons interacting with customer as soon as feasible. Maintain training records and keep in employee files. Ensure that Accessibility Training is updated on an ongoing basis.	Completed & Ongoing

PART II – Information and Communications Standards

Section	Initiative	Description	Accountability	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	<p>IT Quality Control shall conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured.</p> <p>IT Quality Control shall determine what accessible formats and communication supports we will provide upon request</p> <p>HR and Operations shall ensure employees and management are aware of the need to accommodate upon request. This will be communicated within the training module rolled out.</p> <p>L&D and IT Support shall load training modules into website.</p>	December 31, 2014
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and 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.	<p>Customer Service & Marketing shall determine what accessible formats and communication supports we will provide to persons with disabilities upon request. [Web, printed material such as catalogues]</p> <p>Ensure these formats and supports can be provided in a timely manner (ex. 48 hours).</p> <p>Communicate to staff and management that no <u>additional</u> charge to the customer is required.</p>	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<p>Customer Service shall communicate to employees and management this requirement (how we will do this is to be determined. Part of training)</p> <p>Develop protocol for situations where a suitable agreement cannot be made.</p>	January 1, 2016

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<p>HR and Operations shall post a sign in the Home Office reception area.</p> <p>IT and Marketing shall post on gnc.ca website.</p> <p>Marketing shall Include notice on certain print materials, where appropriate.</p>	January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	<p>Assessed workplace Emergency Response Plan and procedures in accordance with the IASR and developed individualized emergency plans, to be utilized when necessary.</p> <p>Customer Service and Marketing shall provide the Emergency Response Plan information prepared for public use to be available in an accessible format or with appropriate communication supports, as soon a feasible, upon request.</p>	January 1, 2012
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites 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.	<p>Reviewed and compliant to requirement changes needed to be made to website by January 1, 2014.</p> <p>Sourcing vendors and pricing to develop accessible website</p> <p>Continuously review WCAG guidelines to be informed of changes and updates</p>	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>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).</p>

PART III – Employment Standard

Section	Initiative	Description	Action	Compliance Date
23	Recruitment, Assessment or Selection Process	<p>23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall 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.</p>	<p>Review and revise recruitment materials, processes, and language to ensure candidates are advised of access to accomodation throughout the candidate selection process.</p> <p>Determine “how” to notify applicants – telephone, email or letter. Designate a contact person to handle queries regarding accessibility.</p> <p>Identify current barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork, etc.</p> <p>Develop interview guidelines, Accessible Interviewing Checklist, etc.</p> <p>Create a process to consult with selected candidates who make an accommodation request, which includes guidelines for situations where it is feasible or not possible to provide the requested accommodation.</p>	January 1, 2016
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Review and revise current recruitment materials and incorporate a statement in the employment contract for successful candidates.	January 1, 2016
25	Informing Employees of Supports	25.(1) Every employer 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 disability.	<p>Create a process to inform employees and new hires of policies pertaining to employees with disabilities. Included will be guidelines for situations where it is not feasible to provide a requested accommodation.</p> <p>Method of communicating the Policy will be through training, posters, internal email, portal, intranet, brochures, etc.</p>	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Revise on-boarding materials and provide required information as soon as feasible after new hires begin.	January 1, 2016

25		25.(3)Employers shall provide updated information to its employees 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 disability.	See section 25 (1) Inform employees on changes to existing policies on job accommodations with respect to disability.	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	26.1 In addition to its obligations under section 12, 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.	Create a process to ensure an appropriate assessment of requirements is carried out, documented and followed up. Create a functional audit of information specific to employee’s role and responsibility. Create an audit of regular communications.	January 1, 2016
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Create a list of what the employee will require – ie. Policy, communication supports that are available (text-to-speech, braille, large print, accessible PDFs, plain language versions, closed captioning).	January 1, 2016
27	Workplace Emergency Response Information	27.(1) Every employer 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.	Create the Emergency Response Plan for Employees with Disabilities. Create the Individual Employee Response Information Form.	January 1, 2012
27		(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.	Review Emergency Response Plan on an ongoing basis and request for employee’s consent.	January 1, 2012

27		(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.	Revise and update Emergency Response Plan process on an ongoing basis to ensure plans are current.	January 1, 2012
27		(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.	Revise and update Emergency Response Plan process on an ongoing basis to ensure plans are current.	January 1, 2012
28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Create a process for documenting individual accommodation plans for employees with disabilities. Determine a process with employees on discussion planning during the on-boarding process.	January 1, 2016
28		28 (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.		

		<p>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> <ol style="list-style-type: none"> 5. The steps taken to protect the privacy of the employee's personal. 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. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 		
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <ol style="list-style-type: none"> (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and (b) shall document the process. 	<p>Review current return to work process and create a specific one for employees returning to work after a disability-related leave of absence.</p> <p>Review to ensure it meets requirements and it is documented and filed.</p>	January 1, 2016
29		<p>29. (2) The return to work process shall,</p> <ol style="list-style-type: none"> (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process. 	<p>Review current return to work process and create a specific one for employees returning to work after a disability-related leave of absence.</p> <p>Review to ensure it meets requirements and it is documented and filed.</p> <p>Identify steps: (Return to Work Process) / (Job Task Analysis Form)</p>	January 1, 2016

29		29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.	<p>Review current return to work process and create a specific one for employees returning to work after a disability-related leave of absence.</p> <p>Review to ensure it meets requirements and it is documented and filed.</p> <p>Create a checklist</p>	January 1, 2016
30	Performance Management	30.(1) 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.	Review current process. Keep individual accommodation plan in mind when conducting performance management reviews and discussions. Include accessibility standards in performance management guidelines.	January 1, 2016
31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	Review current process. Keep individual accommodation plan in mind when discussing career development opportunities and advancements opportunities for employees with disabilities.	January 1, 2016
32	Redeployment	32.(1) 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.	<p>Review current process. Keep individual accommodation plan in mind when discussing redeployment plans for employees with disabilities.</p> <p>Create guidelines for managers to help guide them with redeployment discussions and next steps for employees with disabilities.</p>	January 1, 2016
80	Design of Public Services (Obtaining Services)	80.(4) Renovations and new builds will be constructed (and maintained) in a manner consistent with barrier-free and inclusive design.	Work with Operations and Regional Sales Directors to ensure that new stores/renovations are developed with barrier-free design principles; work with Store Managers regarding maintenance of accessible elements.	January 1, 2017