## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

### INTEGRATED ACCESSIBILITY STANDARDS - Multi Year Plan



## Updated January 1, 2016

#### Part I - GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	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.	Accessibility policy was implemented and affirms our commitment to meeting the accessibility needs of persons with disability in a timely manner and governs the way that Allegion Canada Inc. will achieve accessibility.	Complete	January 1, 2014
4	Accessibility Plans	<ul> <li>4.(1) Large organizations shall,</li> <li>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;</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul>	Approved multi-year plan posted on Allegion.ca and will be provided in alternate formats upon request.  HR will review the plan annually and update as progress is made or at least once every 5 years.	Complete	January 1, 2014
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;	By January 1, 2015, training will have been delivered to applicable employees and those who provide service on Allegion's behalf in Ontario. Training included provincial legislation regarding accessibility and the Ontario	Complete	January 1, 2015

(b) all persons who participate in developing the organization's policies; and	Human Rights Act as it relates to persons with disability.	
(c) all other persons who provide goods, services or facilities on behalf of the organization.	Records of training will be maintained by Human Resources.	

## **PART II – Information and Communications Standards**

Section	Initiative	Description	Action	Status	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.	Allegion will ensure that its processes for receiving and responding to feedback are available in an accessible format when requested by persons with a disability.	Complete	January 1, 2015
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.	Allegion will meet information and communication standards needs of people with disabilities by providing upon request accessible formats or other communication supports in a timely manner.  We do not charge for providing accessible information.	Complete	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.	Allegion will consult with persons requesting accessible format or communication supports to determine suitability of alternative formats.	Complete	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Allegion will notify the public about the availability of accessible formats and communication supports by posting	Complete	January 1, 2016

			the IASR Policy and the Multi-Year Plan on Allegion.ca.		
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.	Compliance will be incorporated into all website projects and Allegion Canada Inc. will comply with WCAG 2.0 Level A by 2021.	Ongoing	After January 1, 2014 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 (Prerecorded).

# PART III – Employment Standard

Section	n Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	As of January 1, 2015, Allegion Canada Inc. will add the following statement to all job postings, whether online or hardcopy:	Complete	January 1, 2016

			"We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs."		
23	Recruitment, Assessment or Selection Process	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.  (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.	As of January 1, 2015, We will notify applicants – via telephone or email of our commitment to provide a barrier free recruitment process.  Interviewers will identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork and will work with candidate regarding accommodation requests.  Accessible Interviewing Checklist will completed if notified of accessibility requirements by a candidate.	Complete	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.	As of January 1, 2015, all job offers will inform successful candidates of our policies for accommodating employees with disabilities by including the following statement: Allegion Canada Inc. has an accommodation process in place and provides accommodations for employees with disabilities. If you require a specific accommodation because of a disability please contact Human Resources so that arrangements can be made for the appropriate accommodations to be in place before you begin your employment.	Complete	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.	Employees will be informed through policy circulation and training.	Complete	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.	As of January 1, 2015, employees will be informed as part of the onboarding process.	Complete	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.	Updated policies will be circulated to employees.	Complete	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,	By January 1, 2016, Allegion will ensure that information necessary for employees to do their job are available in accessible format should it be requested.	Complete	January 1, 2016
		<ul><li>(a) information that is needed in order to perform the employee's job; and</li><li>(b) information that is generally available to employees in the workplace.</li></ul>	By January 1, 2016 Allegion will ensure all regular Company communications that are available to all employees is available in accessible format should it be requested.		
26		26.2. The employer shall consult with the employee making the request in determining the	Employees will be consulted on accessible formats and communication supports.	Complete	January 1, 2016

		suitability of an accessible format or communication support.	Communication supports that may be available are: large print, accessible PDFs, plain language versions, softcopy or verbal.		
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.	The following measures have been implemented: Alternative emergency preparedness are created and updated as required and as soon as practical for employees who Allegion is aware are unable to follow the standard emergency plan in their work location as are of a disability.  We will continue to notify new employees during the onboarding process of the workplace emergency response plan.  Allegion Canada Inc. will utilize the following documents to assist with workplace emergency response evaluations:  A. Identification of Potential Barriers During an Emergency Response  B. Individual Employee Response Information Form	Complete	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.	If the employee consents any designated assistant(s) are provided with the alternative emergency preparedness plan.	Complete	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.	Information will be provided to employees as soon as the need for accommodation has become known.	Complete	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.	Individualized workplace response information will be reviewed when any change occurs that impacts the employee with the disability and will be stored in the employee's file and will be shared with the employee's manager as appropriate.	Complete	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.	By January 1, 2016, Allegion Canada Inc. will review and as necessary modify and document existing return to work processes for employees absent from work due to a disability and require accommodations in order to return to work.	Complete	January 1, 2016
28		<ul> <li>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</li> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense,</li> </ul>	By January 1, 2016 the process established in The Accommodation Process, will meet all elements in section 28 (2).	Complete	January 1, 2016

		to determine if and how accommodation can be achieved.  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.  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	<ul> <li>29.(1) Every employer, other than an employer that is a small organization,</li> <li>(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</li> <li>(b) shall document the process.</li> </ul>	By January 1, 2016, the Return to Work process will be documented and people managers will receive training on the process.	Complete	January 1, 2016

29		<ul> <li>29. (2) The return to work process shall,</li> <li>(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</li> <li>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</li> </ul>	By January 1, 2016, the return to work process will comply with legislative requirements.	Complete	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.	The process developed under Section 29 (1) does not override any other return to work process created by or under any other statute.	Complete	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.	By January 1, 2016, Allegion Canada Inc. will review and as necessary modify existing performance management processes to ensure that the accessibility needs and individual accommodation plans of employees with disabilities are considered.	Complete	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.	By January 1, 2016, Allegion Canada Inc. will review and as necessary modify existing career development processes to ensure that the accessibility needs and individual accommodation plans of employees with disabilities are considered.	Complete	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.	By January 1, 2016, Allegion Canada Inc. will review and as necessary modify existing redeployment processes to ensure that the accessibility needs and individual accommodation plans of	Complete	January 1, 2016

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		employees with disabilities are	
		considered.	

## PART IV – Design of Public Spaces

Recreational trails/beach access routes	N/A	January 1, 2017
Outdoor eating areas (i.e. rest stops or picnic areas)	N/A	January 1, 2017
Outdoor play spaces (i.e. Playgrounds in provincial parks and local communities)	N/A	January 1, 2017
Outdoor paths of travel (i.e. sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals)	By January 1, 2017, outdoor sidewalk and walkways will have a surface that is firm and stable.	January 1, 2017
Accessible parking (on and off street)	Van accessible parking is available.  Off Street Parking – N/A	January 1, 2017
Service-related elements (like service counters, fixed queuing lines and waiting areas)	N/A	January 1, 2017
Maintenance and restoration of public spaces	N/A	January 1, 2017