**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005**

**INTEGRATED ACCESSIBILITY STANDARDS: MULTI-YEAR ACCESSIBILITY PLAN**

**HILTON TORONTO**

## Part I – GENERAL REQUIREMENTS

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 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. | Policies have been developed and are available on the company website. | Complete | January 1, 2014 |
| 4 | Accessibility Plans | 4.(1) Large organizations shall,<br><br>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;<br><br>b) Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and<br><br>c) Review and update the accessibility plan at least once every five years. | Accessibility Plan is developed and posted on company website. Plan is also available in an accessible format upon request.<br><br>Management to review plan every five years. | Complete | January 1, 2014 |

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| 6 | Self-Serve Kiosks | 6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. | Identified all kiosks and have considered accessibility.<br><br>Further consideration to accessibility will be conducted during replacement cycle.<br><br>Kiosks include pay-parking machines and any self-serve stations open to guests and/or team members. | Ongoing | 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,<br>(a) all employees, and volunteers;<br>(b) all persons who participate in developing the organization‘s policies; and<br>(c) all other persons who provide goods, services or facilities on behalf of the organization. | Human Resources representative has trained Department Managers on the Integrated Accessibility Standards and Multi-Year Accessibility Plan.<br><br>Department managers to communicate all relevant standards to their teams<br><br>Training on the Human Rights Code continues to be delivered to all team members during new hire orientation. | Complete | January 1, 2015 |

**PART II – Information and Communications Standards**

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 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. | A review of all feedback processes across the organization has been conducted. Several accessible formats for feedback are available.<br><br>Accessible formats and communication supports will be provided upon request. | 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,<br>a) in a timely manner that takes into account the person‘s accessibility needs due to disability; and<br>b) at a cost that is no more than the regular cost charged to other persons. | Accessible formats and communication supports will be provided when requested.<br><br>Formats and supports will be provided in a timely manner (ie: upon request or within 24 hours) and at no additional charge | 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. | A customer service representative will consult with the person making the request to determine the best format or support to be provided.<br><br>Develop protocol for situations where suitable agreement cannot be reached. | Ongoing | January 1, 2016 |
| 12 | | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Policy posted on company website. | Complete | January 1, 2016 |

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| 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. | Policy posted on company website.<br><br>Policy includes information of who to contact if assistance is needed in an emergency evacuation.<br><br>This requirement has been communicated to all relevant team members and managers. This requirement is communicated to new team members on first day of hire. | | 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. | The Hilton Toronto website currently complies with the Level A success criteria of the Website Content Accessibility Guidelines 2.0 (WCAG 2.0).<br><br>Our site was designed and developed with these guidelines in mind. We have tested our website to ensure that it is usable by guests who use assistive technology.<br><br>We will work with Hilton Worldwide to ensure all our internet websites and web content comply with WCAG 2.0 Level AA by the compliance deadline. | Ongoing | **January 1, 2014**<br>New internet websites and web content on those sites must conform with WCAG 2.0 Level A.<br>**January 1, 2021**<br>All internet websites and web content must conform with WCAG 2.0 Level AA, other than,<br>• Success criteria 1.2.4 Captions (Live)<br>• Success criteria 1.2.5 Audio Descriptions (Pre-recorded). |

**PART III – Employment Standard**

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 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. | A statement to be included on the Hilton Worldwide Careers website indicating the availability of accommodation for applicants with disabilities and contact information for further support.<br><br>Include statement in recruitment and marketing collateral, if used. | Completed | January 1, 2016 |
| 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.<br><br>(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. | Statement to be included when contacting applicants via telephone or email. This will be performed by a Human Resources representative.<br><br>Consider including a statement to all applicants when corresponding through Taleo Recruitment System.<br><br>Identify the verbiage to be used.<br><br>Identify barriers: location of interview room, format of tests, room set-up for in person interviews, interview timelines, support, paperwork, etc.<br><br>Review and revise interview guidelines for suitability. | Ongoing | January 1, 2016 |
| 24 | | 24. Every employer shall, when making offers of employment, notify the successful | Consider adding a statement in the offer letter. | Completed | January 1, 2016 |

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| | Notice to Successful Applicants | applicant of its policies for accommodating employees with disabilities | | | |
| 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. | Communicate to team members and management this requirement. This will be communicated in AODA training modules. | Ongoing | 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. | Circulate AODA policies and Accessibility Plan on first day of hire. Include in New Hire Orientation training | Ongoing | 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. | Updates will be communicated to all hotel team members.<br><br>Some examples of possible communication are: posting on the Health & Safety notice board, AODA team member training, distribution of updated policies. | Ongoing | 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,<br><br>(a) information that is needed in order to perform the employee‘s job; and<br><br>(b) Information that is generally available to employees in the workplace. | Employer will consult with team members on an individual basis to provide appropriate accessible formats, if requested.<br><br>Communicate this requirement to new team members on first day of hire. | Ongoing | January 1, 2016 |

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| 26 | | 26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | Employer will consult with team members on an individual basis to provide appropriate accessible formats. | Ongoing | 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. | Communicate to all team members through Health & Safety notice board that individualized emergency response information will be provided, if necessary, to those who require it. This notice indicates to contact a Human Resources representative for further information.<br><br>New team members will be asked on their first day if they require assistance in an emergency. They are informed that individualize workplace emergency response information is available upon request.<br><br>When requested, individualized workplace emergency response information will be developed on an individual basis based on the team member’s needs.<br><br>In addition, all team members who have identified themselves as having a disability through our Employment Equity questionnaire will be followed up with on an individual basis to determine if individualized emergency response information is required. | Complete | January 1, 2012 |
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| | | (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. | When individualized workplace emergency response information is developed, the appropriate information will be communicated by a Human Resources representative to the person designated in the plan to provide assistance (ex. Department Manager). | | |
| 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. | All new hires will be asked in an optional self-identification questionnaire if they have a disability. They will also be asked if they require any assistance in an emergency evacuation.<br><br>If the team member does require individualized emergency response information, a plan will be developed to address the team member’s needs as soon as possible (preferably within 2 weeks of hire) | Complete | January 1, 2012 |
| 27 | | (4) Every employer shall review the individualized workplace emergency response information,<br>(a) when the employee moves to a different location in the organization;<br>(b) when the employee‘s overall accommodations needs or plans are reviewed; and<br>(c) when the employer reviews its general emergency response policies. | The emergency response plan will be reviewed:<br>(a) If and when the team member transfers to another Hilton Worldwide hotel<br>(b) Every 5 years to ensure all information is relevant<br>(c) When general hotel emergency response policies are reviewed | Complete | January 1, 2012 |

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| 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. | A form has been developed by the Human Resources Department. If a team member indicates that he or she will require individualized emergency response information, a Human Resources representative will work with the team member to complete the form and develop the individualized emergency response plan. The plan will be signed by the team member as a sign of approval and as consent to share the information with those designated to help in an emergency situation. The plan will be kept in the team member's confidential personnel file. | Complete | January 1, 2016 |
| 28 | | 28 (2) The process for the development of documented individual accommodation plans shall include the following elements:<br><br>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.<br><br>2. The means by which the employee is assessed on an individual basis.<br><br>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 and how accommodation can be achieved.<br><br>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is | (1) A form has been developed by the Human Resources Department to be used when creating individualized emergency response plans. The team member, or support person if necessary, will be consulted to develop an individualized plan.<br><br>(2) The team member's needs will be assessed through interviews with the team member or support worker. This process will be modified on an individual basis, if required, to meet the team member's needs.<br><br>(3) If necessary, the hotel will provide the team member with an Internal Ability Form to determine the team member's limitations and | Complete | January 1, 2016 |

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| | | 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.<br><br>5. The steps taken to protect the privacy of the employee‘s personal information.<br><br>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.<br><br>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.<br><br>8. The means of providing the individual accommodation plan in a format that takes into account the employee‘s accessibility needs due to disability. | whether accommodation is required.<br><br>(4) If requested, the hotel may allow a unionized team member to be represented by a union shop steward.<br><br>(5) All team members’ personal information will be kept confidential as per Hilton Worldwide Information Security & Privacy policy. All information will be kept in the team member’s personnel file within the Human Resources Department<br><br>(6) The emergency response plan will be reviewed:<br>(a) If and when the team member transfer to another Hilton Worldwide hotel<br>(b) Every 5 years to ensure all information is relevant<br>(c) When general hotel emergency response policies are reviewed<br>The team member will be consulted on an individual basis for review of the plan. This will be done through interviews with the team member or support worker. This process will be modified on an individual basis, if required, to meet the team member’s needs.<br><br>(7) If an accommodation plan is denied, this will be communicated in writing to the team member (and support worker, union representative, if necessary) with specific reasons for the denial. | | |

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| | | | (8) The hotel will provide an accommodation plan in an accessible format, if requested. This will be determined on an individual basis. | | |
| 29 | Return to Work Process | 29.(1) Every employer, other than an employer that is a small organization,<br><br>(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<br><br>(b) shall document the process. | The hotel will develop a return to work plan for all team members who require disability-related accommodations in order to return to work. This plan will be discussed with and signed by the team member. The plan will be kept in the team member's personnel file. Further information is provided in the hotel's Return To Work Policy. | Complete | January 1, 2016 |
| 29 | | 29. (2) The return to work process shall,<br><br>(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<br>(b) use individual documented accommodation plans, as described in section 28, as part of the process. | The return to work letter will be provided by a Human Resources representative of a Department Manager. The letter documents specifics steps the hotel will take to facilitate the return to work of team members who were absent as well as individual accommodation plans, which may include temporary modified work duties. | 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. | This will be documented in our policy. | Complete | January 1, 2016 |
| 30 | Performance Management | 30.(1) An employer that uses performance management in respect of its employees | Individual plans will be taken into account. | Complete | January 1, 2016 |

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| | | 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. | | | |
| 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. | Individual plans will be taken into account. | 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. | Individual plans will be taken into account. | Complete | January 1, 2016 |