

Cadillac Fairview Corporation Ltd

Multi-Year Accessibility Plan 2012-2022 December

In Compliance with O. Reg. 191/11
Including Information and Communication and Employment
Accessibility Standards

February 2022

Due for update – February 2022

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Introduction

The Accessibility for Ontarians with Disabilities Act (AODA) was proclaimed by the Province of Ontario in 2005. The legislation aims to develop, implement and enforce accessibility standards in order to achieve full accessibility in the Province by 2025.

Cadillac Fairview is committed to providing accessibility for persons with disabilities through AODA's customer service standard, integrated accessibility standards and all other standards as they are developed, and in accordance with the requirements of the Ontario Human Rights Code.

Therefore, the Cadillac Fairview Corporation Ltd presents this Multi-Year Accessibility Plan which addresses compliance requirements from 2012-2017.

The Plan addresses activities and deliverables specified in the Information and Communication, Employment and Design of Public Spaces Accessibility Standards and Regulations and outlines an action plan for meeting these regulations. This document is available to the public and in alternate format and accessible communication supports upon request.

Cadillac Fairview remains committed to providing excellent customer service to all its customers, including our customers with disabilities.

Legislation Deadline:

January 1, 2012

Integrated Accessibility Standard Regulation: General Regulations

Regulation Requirement

O. Reg. 191/11- 13 (1-2)

Organizations that prepare organizational emergency procedures, plans and public safety information and make that information available to the public, **shall** provide this information in an accessible format or via accessible communication supports as soon as practicable upon request

Action Plan

1. Communication Plan:
 - 1.1. Inform public of alternate format availability. Post notice on website, provide in printed materials and in all other corporate communications.
2. Establish Alternate Format Service Provider - Vendor of Record:
 - 2.1. Source and select Alternate Format Service Provider - Vendor of Record
 - 2.2. Establish internal procedures for processing requests for alternate formats (i.e. how vendor is contacted, how requests are tracked, response procedure to customer, customer follow-up)

Responsibility

Operations – Ontario Portfolio
Corporate Communications

Required Resources

- 1.1 Communication Plan
- 2.1 Alternate Format Service Provider Vendor
- 2.2 Alternate Format request procedure

Status

Complete

Legislation Deadline:

January 1, 2012

Integrated Accessibility Standard Regulation: General Regulations

Regulation Requirement

O. Reg. 191/11- 27 (1-4)

Individualized workplace emergency response information must be provided upon request and in accessible formats when need is articulated. Individualized workplace emergency response information **shall** be reviewed when: employee moves to different location in organization, employee's overall accommodation needs or plans are reviewed and when employer reviews general emergency response policies.

Action Plan

1. Emergency Response Plan Template
 - 1.1 Create Emergency Response Planning Template and distribute to CF location contacts
2. Communication Plan:
 - 2.1 Inform Staff of Emergency Response assistance

Responsibility

Operations – Ontario Portfolio
Human Resources

Required Resources

- 1.1 Emergency Response Plan Template
- 2.1 Notice of Emergency Response assistance provided to staff

Status

Complete

Integrated Accessibility Standard Regulation: General Requirements

Regulation Requirement

O. Reg. 191/11- 3 (1-4)

Accessibility Policy

Develop Accessibility Policy to address compliance with Integrated Accessibility Standard Regulation. Policy can be one or more documents. Sections have varying compliance Due Dates.

Action Plan

1. Policy:

- 1.1 Update Accessible Customer Service Policy to address requirements of Integrated Accessibility Standard Regulation O. Reg. 191/11
- 1.2 Communicate policy to Cadillac Fairview Ontario location staff (provided in alternate formats - Large Print x 6 Braille x 3 Audio CD x 2eText CD x 1)
- 1.3 Ensure locations post updated policies to websites

Responsibility

Operations – Ontario Portfolio
Corporate Communications

Required Resources

- 1.1 Accessibility Policy
- 1.2 Circulation to location staff Website posting

Status

Complete

Legislation Deadline:

January 1, 2014

Integrated Accessibility Standard Regulation: General Requirements

Regulation Requirement

O. Reg. 191/11- 4 (1-4)

Accessibility Plan

To outline compliance plan in regards to Integrated Accessibility Standard Regulation. Must be posted on website upon completion. Annual Progress Report required. Complete Plan update required every 5 years.

Action Plan

1. Plan Development:
 - 1.1. Develop Multi-Year Accessibility Plan
 - 1.2. Develop Progress Report Template

Responsibility

Operations – Ontario Portfolio
Corporate Communications

Required Resources

- 1.1 Multi-Year Accessibility Plan
- 1.2 Progress Report Template

Status

Complete

Legislation Deadline:

January 1, 2014

Integrated Accessibility Standard Regulation: General Requirements

Regulation Requirement

O. Reg. 191/11- 5 (1-3)

Procurement Procedures – Self-Serve Kiosks

- Obligated organizations shall incorporate accessibility features when designing, procuring or acquiring self-service kiosks.

Action Plan

1 Review of Procurement Procedures:

- 1.1 Establish Accessibility criteria for purchasing self-serve kiosks

Responsibility

Operations – Ontario Portfolio

Required Resources

- 1.1 Analysis of Procurement Procedures and Purchasing Policy Update to include self-serve kiosks accessibility criteria

Status

Complete

Legislation Deadline:

January 1, 2014

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 14 (1-7)

Websites*

New websites and web content **shall** conform to W3C WCAG 2.0 Level A. Except where not practicable, this applies to:

- Websites
- Web content (published after January 1, 2012)
- Web-based applications that an organization controls directly or through a contractual relationship that allows for modification of a product.

Action Plan

1. Website and Application Review:
 - 1.1. Source and contract website accessibility audit provider.
 - 1.2. Conduct website accessibility audit of the following Cadillac Fairview websites: Retail, Office, Corporate, Mobile, Shops.ca, Retail Promo Tool, Leasing Sites and Talcara Employee Recruitment System
 - 1.3. Review web-based applications used in Cadillac Fairview operations – CF shopcard.ca
 - 1.4. Include accessibility provisions/criteria in purchase of service contracts for web-based applications

Responsibility

Information Technology

Required Resources

- 1.1 Website accessibility audit
- 1.2 Web Application review and analysis
- 1.3 Update Service contracts to include accessibility criteria
- 1.4 Accessibility Checklists for Procurement

Status

In Progress:

- Audits of websites are performed monthly. Website redesigns and updates are scheduled regularly which include addressing audit results.
- All retail, leasing and corporate websites were redesigned in 2015 and are now AODA compliant.
- 50% of office websites were redesigned and deployed in 2017 with the remainder scheduled for 2018.
- The Retail Promo Tool (cfpromo.ca) was replaced with a new CF Retail Portal (cfretailportal.ca) in 2015 and is now AODA-compliant
- CFSHOP! Card website was redesigned in October 2016 and is AODA compliant.

Cadillacfairview.com is scheduled to be redesigned in 2020 and will be AODA Level AA compliant. Office, retail & Shops websites review planned for March 2020 (cfoffice.ca, cfretail.ca and cfshops.com).

Update January 2021

The CORP site will be completed end of February and the remaining CF sites expected completion is end of May 2021. .

Legislation Deadline:

January 1, 2015

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 7 (1-6)

General IASR Training

Employers **shall** provide training regarding Integrated Accessibility Regulation to all employees and volunteers, persons who participate in developing organizational policy and other persons who provide goods, services or facilities on behalf of the organization.

Training to take place as soon as practicable and **shall** include any changes to policies on an ongoing basis. Record keeping of training provided and number of participants is required

Action Plan

1. Training Plan Development:

1.1. Contract training vendor

1.2. Train staff in General Requirements, Information and Communication Standard as appropriate and in relation to their roles and responsibilities; for example: accessible web info, accessible print info, how to create in-house accessible documents and PDF's, TTY's, alternate formats and their uses).

1.3. Update Accessible Customer Service Training – refresher training required

1.4. Ensure senior staff participate in online training provided by Ontario Human Rights Commission:
<http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>

Responsibility

Health and Safety & HR

Required Resources

1. Training Plan
2. Training Vendor

Status

Complete: Training purchased from vendor – October 2014 – Courses Uploaded to CF learn
Employees notified to complete training by December 31st 2014. Human rights code brochure distributed to all Ontario employees.

Legislation Deadline:

January 1, 2015

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 11 (1-4)

Feedback Mechanism

Ensure accessible feedback mechanism in relation to areas covered under Integrated Accessibility Regulation. Every obligated organization **shall** notify public about availability of accessible formats and communication supports.

Action Plan

1. Feedback Mechanism Update

1.1 Update Feedback mechanism. Ensure web-based feedback mechanism is accessible. Ensure multiple channels of feedback are available.

1.2 Mechanism/Policy to be expanded to include procedures for dealing with alternate format requests and employment related feedback

Responsibility

Corporate Communications

Required Resources

1.1 Feedback mechanism updated

1.2 Policy updated

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 22

Accommodation –Recruitment

Notice **shall** be provided to employees and public about the availability of accommodation for applicants with disabilities during recruitment process.

O. Reg. 191/11 – 23(1-2)

Accommodation – Selection

Accommodation **shall** be provided to applicants selected to participate in assessment or selection process, upon request. Suitable accommodation **shall** be provided in manner that takes applicant’s accessibility needs.

Action Plan

1. Policies and Procedures:

- 1.1. Create a Disability Accommodation Policy and related procedures. Ensure policy includes accommodation during the recruitment and selection processes.
- 1.2. Communicate the availability for accommodation during the recruitment process through the company website including notice in on-line job postings and advertisements. Candidates to be notified again of the availability for accommodation during the interview and final offer stages.

Training

- 1.3. Provide procedural training regarding providing applicant accommodation for staff responsible for recruiting, selecting and hiring staff as well as staff who would participate in the recruitment process.

Responsibility

Human Resources

Required Resources

- 1.1 Updated policies
- 1.2 Updated procedures and online tool
- 1.3 Procedural training

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 - 24

Accommodation Notice - New Employees

Successful applicant **shall** be informed of availability of accommodation and **shall** be provided with accommodation policy when making offer of employment.

Action Plan

1. Policy:
 - 1.1. Create procedures for notifying candidates at time of offer that CF has a Disability Accommodation Policy.
 - 1.2. Create procedures for notifying new employees regarding the on-line availability of the Disability Accommodation Policy and related forms including the Employee Emergency Response Form.

Responsibility

Human Resources

Required Resources

- 1.1 Communication of policy to individuals responsible for selection and hiring
- 1.2 Updated policies on CF Connect
- 1.3 Onboarding program to include CF Connect review

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 25 (1-3)

Accommodation Notice - All Employees

Accommodation policy provided to all employees and updates provided whenever changes are made

Action Plan

1. Policy/Procedure:
 - 1.1 Provide updates to employees as required.
 - 1.2 Communication and procedural training (where applicable) provided to staff responsible for recruiting, selecting and hiring staff as well as staff who would participate in the recruitment process.

Responsibility

Human Resources

Required Resources

- 1.1 Communication Plan
- 1.2 Training Updates

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 26 (1-2)

Alternate formats provided to employees with disabilities upon request including information needed to perform employee's job, information generally available in workplace. Employer will consult employee making request when determining suitability of accessible format provided.

Action Plan

1. Policy and Procedure:

1.1 Inform Cadillac Fairview staff of availability of alternate format vendor of record

1.2 Establish Process/procedure regarding how to respond to requests for alternate formats from employees to be established. All Health and Safety and Orientation material (as relevant to the employee and job description) to be included

Responsibility

Human Resources
Corporate Communications

Required Resources

1.1 Communication Plan
1.2 Alternate Format request procedure

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 28 (1-2)

Documented Accommodation Plans provided to employees with disabilities

O. Reg. 191/11 – 29 (1-3)

Documented Return-to-Work process established including disability-related accommodations

Action Plan

1. Accommodation Planning Tool:

1.1. Create Accommodation Planning Form and Individualized Accommodation Plans as required and maintain records in Human Resources

2. Return-to-Work Accommodation Planning Tool:

2.1 Create Return-to-Work Process and Accommodation Planning Form

2.2 Complete Individualized Accommodation Plans as required and maintain records in Human Resources

Responsibility

Human Resources

Required Resources

1. Accommodation Planning Template
2. Return-to-Work Accommodation Planning Template
3. Procedural training for Human Resources staff

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 30 (1-2); 31 (1-2); 32 (1-2)

Accessibility Throughout Employment Life-Cycle

Performance Management, Career Development and advancement and Redeployment/Reassignment processes include accessibility accommodation and provided in alternate format

Action Plan

1. Performance Management:
 - 1.1 Provide procedural training for Managers and Supervisors, as required
2. Career Development and Advancement:
 - 2.1 Establish procedure for addressing accommodation needs in advance of training, as required
3. Redeployment:
 - 3.1 Provide procedural training for employee transfers and redeployment, as required

Responsibility

Human Resources

Required Resources

1. Disability Accommodation Policy
2. Communication Plan
3. Procedural Training, as required

Status

Complete

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 7 (1-6)

Training in Employment Process and OHRC

Employers **shall** provide training regarding Integrated Accessibility Regulation – Employment Standard and Ontario Human Rights Code to all employees (i.e. Accessible recruitment and screening, employment policy and accommodation planning training).

Training to take place as soon as practicable and **shall** include any changes to policies on an ongoing basis. Record keeping of training provided and number of participants is required

Action Plan

1. Training Plan Development:

1.1 Train staff in Employment Standard and related procedural training as appropriate and in relation to their roles and responsibilities

1.2 Ensure senior staff participate in online training provided by Ontario Human Rights Commission:

<http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>

Responsibility

Human Resources

Organizational Development

Required Resources

- 1 Training Plan
- 2 Training Vendor

Status

Complete

Training included as per job role in CF connect

Training on going for new and promoted employees and scheduled

Legislation Deadline:

January 1, 2016

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 - 12 (1)

Organizational Material in Alternate Format:

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 and in consultation with the person making the request

Action Plan

1. Alternate Format Provision:

- 1.1. Create Accessible Style Guide – including standardized templates for accessible word processing, accessible PDF's and accessible web-based materials.
- 1.2. Participate in accessible template procedural training and other accessible communication refresher training as needed.
- 1.3. Collate inventory of vital organizational material within all departments and obtain quotes for conversion into various alternate formats according to legislated deadlines.

Responsibility

Ontario Operations
Corporate Communications

Required Resources

Standardized Style Guide
Training update
Inventory
Procedures

Status

Additional training planned for 2017 – Completed and ongoing
Resource for alternate format identified and communicated

Legislation: January 1, 2016 - for new construction or redevelopment

Integrated Accessibility Standard Regulation: Design of Public Spaces

Regulation Requirement

O. Reg. 413/12

Standard applies to public spaces that are newly constructed or redeveloped on and after January 1, 2016. The standard applies to new construction or major renovations being designed for the following facilities or elements:

- Recreational trails
- Outdoor public eating areas
- Outdoor play spaces
- Exterior paths of travel
- Off-street parking
- Service counters and Waiting areas (indoor and outdoor)

Action Plan

Ensure newly constructed or redeveloped facilities on and after January 1, 2016 meet Accessibility Standard requirements.

Responsibility

Ontario Operations & Development

Required Resources

Analysis of Standard requirements

Status

Analysis completed. Design of Public Spaces criteria to be included in new construction and renovation projects.
Audit of wayfinding and signage requirements in plan for 2018 – No progress – under review
Internal committee set up to review legislative requirements and industry best practices – In progress

Proposed: 2016 – 2022 December

Accessible Parking

The accessible parking requirements apply to new parking facilities and the redevelopment of existing parking facilities.

For the purposes of this regulation, re-painting of existing lines to mark parking spaces and other periodic maintenance or restorative activities do not trigger redevelopment requirements.

Obtaining Services

Requirements for obtaining services are divided into three areas:

1. 80.40-80.41 Service Counters
2. 80.42 Fixed Queuing Guides
3. 80.42 Waiting Areas

80.40 (1) Obligated organizations shall meet the requirements set out in this Part in respect of the following:

1. All newly constructed service counters and fixed queuing guides.
2. All newly constructed or redeveloped waiting areas.

Areas under review

- Completed pilot project assessments by Rick Hansen Foundation for two commercial office buildings (Simcoe Place & RBC) in 2018
- Two more properties in Vancouver (Richmond Centre & Pacific Centre) planned for 2019
- CF Masonville Place customer service kiosk design under review by accessibility consultant to incorporate industry best practices – Completed
- CF Lime ridge – Universal washroom project review with RHFAC – Completed
- Tray collecting stations – Review by RHFAC – Completed (install in progress)

2020

- TOP properties – AODA audits underway to determine compliance with RHFAC standards
- RBC – RHFAC gap analysis review for higher levels of certification
- Markville Mall & Sherway Gardens RHFAC assessments completed – Certified

2021

- TOP – Working towards RHFAC certification – **Completed (All Toronto Office buildings RHFAC certified)**
- Plan to include additional retail spaces (under planning stages – delays due to COVID)

2022

- Accessibility review
 - Waterfront Properties
 - Toronto Eaton Centre and office buildings