



# INTEGRATED ACCESSIBILITY STANDARDS

## 1. PURPOSE

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with disabilities.

The *Integrated Accessibility Standards* (the “IAS”) is a regulation under the Act, the purpose of which is to ensure accessibility for persons with disabilities in the areas of (i) Information and Communication, (ii) Employment, (iii) Transportation and (iv) Design of Public Spaces. The purpose of this policy (the “Policy”) is to identify and document how ADT Security Services Canada, Inc., including Protectron (“ADT” or the “Company”) currently achieves accessibility by meeting the requirements of the IAS and how it will continue to work towards improving accessibility for persons with disabilities.

The Policy is not intended to replace or supersede the Accessible Service Policy.

For a more detailed explanation of ADT and Protectron’s strategy to prevent and remove barriers for persons with disabilities, please refer to the Multi-Year Accessibility Plan (“the “Accessibility Plan”) which is available on the ADT intranet and website.

## 2. STATEMENT OF COMMITMENT

ADT and Protectron are committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with disabilities in a timely manner.

## 3. APPLICATION

Unless otherwise limited herein, the Policy applies to all:

- i. employees and volunteers;
- ii. persons who provide goods, services and/or facilities to the public or other third parties on behalf of ADT or Protectron; and
- iii. persons responsible for the development of ADT and Protectron’s policies.

This Policy does not replace or affect existing legal obligations under the *Human Rights Code* R.S.O. 1990, c. H.19, as it may be amended from time to time, or any other applicable laws respecting the accommodation of persons with disabilities.

## 4. DEFINITIONS

- i. ***Accessible Formats*** - may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

- ii. **Communication Supports** - may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- iii. **Disability** – means:
  - a) any degree of physical disability, infirmity, malformation or disfigurement;
  - b) a condition of mental impairment or a developmental disability;
  - c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
  - d) a mental disorder; or
  - e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
- iv. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- vi. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- vii. **Unconvertible Information or Communication** – means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- viii. **Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The WCAG contain two levels of compliance, Level A and Level AA.

## 5. IMPLEMENTATION

Responsibility for the implementation of the Policy is shared between all departments of ADT and Protectron. For more information, please see the Multi-Year Accessibility Plan.

## 6.

## **GENERAL ACCESSIBILITY STANDARDS**

### **I. Multi-Year Accessibility Plan**

ADT and Protectron have established and implemented a Multi-Year Accessibility Plan which outlines the Company's strategy to prevent and remove barriers for persons with disabilities and meet the requirements of the IAS in accordance with the timelines set out therein.

ADT and Protectron will maintain the Multi-Year Accessibility Plan in accordance with the requirements of the IAS. The Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years.

The Multi-Year Accessibility Plan is posted on ADT's website and will be made available in an Accessible Format upon request.

ADT shall file an accessibility report with the Province annually, for both ADT and Protectron, or at such other times as may be specified.

### **II. Training**

By the compliance deadline, training will be provided to all existing employees, volunteers, and all persons who participate in the development of AODA Policies.

Training will be provided on:

- i. the requirements of the Integrated Accessibility Standards;
- ii. the *Human Rights Code* as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the Integrated Accessibility Standards.

The content of the training will be applicable to the individual's duties.

Employees hired, and volunteers accepted, after the Compliance Deadline for Training will receive the required training within the regular onboarding process but no longer than three (3) months after commencing duties.

Records will be kept of the training provided, including the dates on which the training was provided, and the number of individuals to whom it is provided.

ADT and Protectron will ensure that contractors providing goods, services and/or facilities on the Company's behalf have received the training required under the IAS.

7.

## **INFORMATION AND COMMUNICATION STANDARDS**

ADT and Protectron will include the requirements of the Information and Communications Standards in its Multi-Year Accessibility Plan which outlines the organizations' strategies to provide accessible information and communications. This includes:

- Assessing barriers to information and communications systems/platforms
- Determining the accessibility of information components and systems
- Establishing a practice that Company documents be created in structured electronic format to allow for easier conversion to accessible formats
- Establishing a Company standard for documents that will be as accessible as possible without need for accessible formats (e.g. font style, font size, colour contrast, plain language.)

The Information and Communications Standards do not apply to:

- i. products and product labels;
- ii. unconvertible information or communications; and
- iii. information that ADT or Protectron does not control directly or indirectly through a contractual relationship.

Should ADT or Protectron determine that information or a communication is Unconvertible, it will explain why and provide the person making the request with a summary of the said information or communication.

### **I. Feedback Procedures**

By January 1, 2015, ADT and Protectron will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

ADT will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

Nothing in this section detracts from the commitments in the ADT Accessible Service Policy and the Feedback Procedure listed within.

### **II.**

## **Accessible Formats & Communication Supports**

By January 1, 2016, ADT and Protectron will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods and/or services it offers, accessible to persons with disabilities.

ADT and Protectron will notify the public about the availability of accessible formats and communication supports, which will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

ADT and Protectron will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support.

### **III. Accessible Websites and Web Content**

By the Initial Website Compliance Deadline, ADT and Protectron will ensure that, where practicable, a New Internet Website and web content on such site(s), or any significant refresh or redesign of the current site, conforms with WCAG 2.0 Level A.

By the Final Website Compliance Deadline, ADT and Protectron will ensure that, where practicable, any website or content on that site(s) published after January 1, 2021, conforms with WCAG 2.0 Level AA to the extent required by the IAS.

The commitment to provide accessible websites and web content only applies to websites and web content that ADT or Protectron controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

## **8. EMPLOYMENT STANDARDS**

The Employment Standards only apply to employees of ADT and Protectron. They do not apply to volunteers, other unpaid individuals, or contractors. ADT and Protectron will inform employees of the policies and changes in policies used to support employees with disabilities throughout the employment life cycle.

### **I. Recruitment/Selection/Assessment**

By January 1, 2016, ADT and Protectron will specify, on the website and directly on job postings, that accommodation is available for applicants with disabilities in its recruitment processes. ADT and Protectron will notify all job applicants who are individually selected to participate in an assessment or selection process that accommodation is available upon request if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, ADT and Protectron 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.

### **II.**

## **Notice to Successful Applicants**

By January 1, 2016 ADT will ensure that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

### **III. Informing Employees of Supports**

By January 1, 2016, ADT and Protectron will inform its existing employees of its policies on supporting 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.

ADT and Protectron will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

All employees hired after the Informing Employees of AODA Policies Compliance Deadline, will be notified of ADT and Protectron's policies on supporting employees with disabilities within the regular onboarding process and no longer than three (3) months after commencing duties

### **IV. Accessible Formats and Communication Supports for Employees**

By January 1, 2016, ADT and Protectron will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.

ADT and Protectron will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, ADT and Protectron reserve the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

### **V. Workplace Emergency Response Information**

If an employee has a disability and due to that disability, the employee requires an individualized workplace emergency response, the employee will be asked to complete an Emergency Response Worksheet. The employee with a disability completes this worksheet with his/her manager to help identify threats to the employee's safety that could arise in an emergency situation. The worksheet is also used to provide suggestions on how to overcome the identified threats.

The information collected is confidential and will be shared only with the employee's consent. The employee does not have to provide details of his medical condition or disability—only about the type of support needed in an emergency.

The manager will use the information collected in the Emergency Response Worksheet to create an Individualized Employee Emergency Response Plan. The Emergency Response Plan should be reviewed with the employee at least annually and at times when:

- the employee's need for accommodation changes;
- the employee's location of work or work space changes;
- the employee's hours of work change;
- the employee no longer requires an Individualized Employee Emergency Response Plan.

## **VI. Documented Individual Accommodation Plans**

By January 1, 2016, ADT and Protectron will have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process will include the following elements:

- i. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- ii. The means by which the employee is assessed on an individual basis.
- iii. The manner in which ADT and Protectron can request an evaluation by an outside medical or other expert, at its own expense, to assist in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
- iv. The manner in which the employee can request the participation of a representative from his or her 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.
- v. The steps ADT and Protectron will take to protect the privacy of the employee's personal information.
- vi. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- vii. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
- viii. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports described in section 8IV above.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information as described in section 8V above.

## **VII.**



## **Return to Work Process**

By January 1, 2016, ADT and Protectron will have a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps ADT and Protectron will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section 8V.

## **VIII. Performance Management, Career Development and Advancement, and Redeployment**

By January 1, 2016, ADT and Protectron will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when providing career development and advancement opportunities, when considering redeployment, and when applying its performance management process.

## **9. DESIGN OF PUBLIC SPACES STANDARDS**

ADT and Protectron will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017. For further information on existing or planned projects to redevelop or construct new public spaces see ADT and Protectron's Multi-Year Accessibility Plan.

## **10. QUESTIONS ABOUT THIS POLICY**

For more information about this Policy or the Multi-Year Accessibility Plan, please contact management or your Human Resources Link.