



Policy 4.04.03-Accessibility Statement of Commitment, Multi-Year Plan and Accessible Customer Service Policy

1. Statement of Commitment

- a. ICON Property Management (ICON) is committed to ensuring a safe, welcoming, and accessible environment that respects the dignity, independence, integration, and equal opportunity of people with disabilities.
 - i. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#).
- b. ICON is committed to becoming a barrier free organization that strives to comply with the requirements of all existing legislation through policies, procedures, and training for employees.
 - i. We are also committed to ensuring that persons with disabilities are aware of their rights and responsibilities to foster an accessible and inclusive environment, while remaining open to suggestions concerning best practices.
 - ii. Where accommodation is possible, persons with disabilities will be provided with such accommodations at no charge.

2. Policy Scope & Review

- a. This policy applies to all ICON employees and agents.
- b. Accountability for implementing these policy requirements rests with ICON's Senior Vice President of Operations, Christy Plaitis, christy@iconpm.ca.
- c. This policy and program will be reviewed annually to assess its continued effectiveness and suitability.

3. Multi-Year Plan

- a. In accordance with ICON's obligations under the AODA, and specifically [O.Reg 191/11: Integrated Accessibility Standards](#), we have prepared a multi-year accessibility plan which outlines the policies and actions that ICON will put in place from 2020-2025 to prevent and remove barriers and enhance accessibility for people with disabilities who work for our company and those who are our clients and visitors.
 - i. This document is subject to change and will be adjusted from time to time, as required.



4. Design of Public Spaces

- a. When making major building modifications or renovations to our public spaces, ICON will ensure we are meeting the Design of Public Spaces Standards.
 - i. All accessibility elements for which ICON is responsible will be properly maintained and immediately repaired.

5. Communication

- a. When communicating with individuals with disabilities, ICON staff will consider their disabilities and make reasonable efforts to ensure clear communication and understanding.
 - i. Reasonable efforts shall be made to ensure that communication in all formats (i.e. verbal, written or electronic) are presented in a manner that is accessible.

6. Accessible Formats

- a. ICON is committed to meeting the communication needs of people with disabilities.
 - i. We will consult with people with disabilities to determine their information and communication needs and will provide information in accessible formats or with communication supports.

7. Use of Assistive Devices

- a. ICON supports the use of assistive devices by persons with disability to obtain, use or benefit from ICON's goods and services.
 - i. ICON will use its best efforts to accommodate all assistive devices. If necessary, ICON will use alternate methods to provide services to visitors with disabilities in a manner that takes their accessibility into consideration.
 - ii. ICON will provide ongoing training to its employees to ensure they are familiar with various types of assistive devices that may be used by persons with disabilities when accessing services from ICON.

8. Accessibility Emergency Information

- a. ICON will provide our clients with publicly available emergency information in an accessible format upon request.
 - i. We will also provide employees with disabilities with individualized emergency response information where necessary.

9. Use of Service Animals

- a. ICON welcomes visitors with disabilities and their service animals. Certified service animals will be permitted on the premises unless the animal is specifically excluded by law.
 - i. ICON is aware that service dogs are usually well trained and well-behaved. In the unlikely event that this is not the case, the service animal may be removed

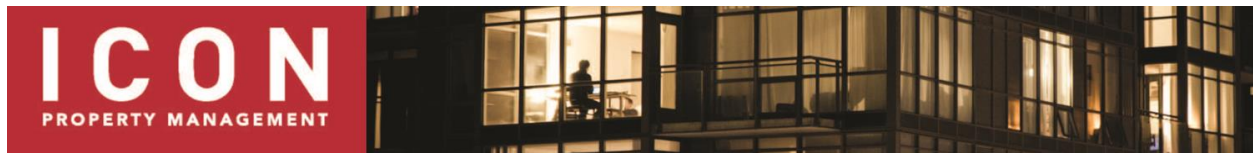


from ICON's corporate head office after discussion with the individual with disabilities for any one of the following reasons:

1. Disruptive or aggressive behaviour such as growling or other signs of threatening or aggressive behaviour.
 - a. Employees must note that in the case of a Seizure Response Dog this is the expected response when assisting a person with a disability.
 2. Causing damage, including causing damage to any person or property.
 3. Poor health such as a contagious disease when the animal risks spreading the disease to others.
- ii. In the rare event that a service animal is not allowed into certain sections of our premises, ICON will ensure that this information is communicated to our clients and that alternative appropriate measures are provided to enable the client with a disability to obtain, use or benefit from the goods and or services provided by ICON.

10. Use of Support Persons

- a. A support person may accompany a person with a disability to assist them in a number of ways.
 - i. A person may include a friend, family member, volunteer or paid professional chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services.
 1. Personal care needs include but are not limited to physically transferring an individual from one location to another or assisting an individual with eating or using the washroom.
 2. Medical needs may include, but are not limited to, monitoring an individuals' health or providing medical support by being available in the event of a seizure.
- b. If a person with a disability is accompanied by a support person, ICON shall ensure that both persons are permitted to enter the premises together.
 - i. A person with a disability accompanied by a support person will not be prevented access to that support person at any time while receiving goods and services from ICON.
 - ii. When addressing a person with a disability who is accompanied by a support person, employees and agents of ICON will communicate directly with the person with a disability.
- c. In order to preserve the client's confidentiality, ICON employees will always ask permission to discuss confidential matters in front of the support person.
 - i. If confidential and or personal information is being exchanged and the person with a disability requests to discuss the information in private, the request will be accommodated, and the support person will be asked to wait in another area.



11. Notice of Temporary Disruption in Services

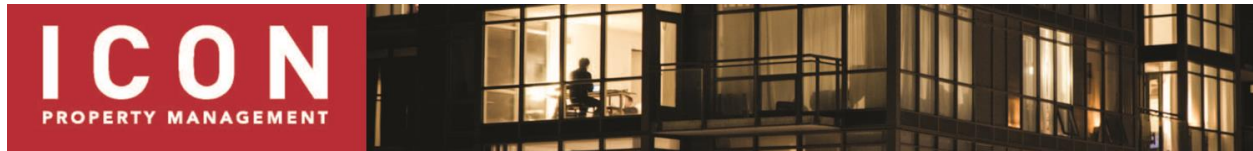
- a. On occasion, certain ICON facilities used by individuals with disabilities may be temporarily unavailable. ICON will make every effort to notify visitors with disabilities of any planned or unexpected disruptions.
 - i. Notice will be provided within a reasonable timeframe of an unplanned disruption and will be provided in advance when disruptions are planned.
 - ii. Notices will contain the following information:
 1. The reason for the disruption;
 2. Its expected duration; and
 3. Alternative facilities if they exist.
- b. Notices will be placed in a conspicuous place on ICON's premises and in a form that considers the types of disabilities of persons who use the disrupted service.
 - i. For example, a notice of disruption for an elevator will be placed at a height that would be in the line of vision for an individual using a wheelchair.

12. Training for Staff

- a. ICON provides training to ICON employees on Ontario's accessibility laws and on the Ontario Human Rights Code as it relates to people with disabilities.
 - i. The training will include the following:
 1. The purposes of the AODA;
 2. How to interact and communicate with people with various types of disabilities;
 3. How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person; and
 4. What to do if a person with disability is having trouble accessing goods and services.
- b. ICON understands that appropriate training is a key component in ensuring that ICON continues to provide accessible client services.
 - i. Accordingly, ICON requires all new employees to complete our accessibility training course as soon as practicable after commencing their employment.
 - ii. ICON shall provide ongoing training in connection with any changes to our policies, practices, and procedures governing the provision of services to persons with disabilities.
 - iii. ICON's Compliance Manager will maintain written training records that include the date the training was provided, the type of training and the name of the trainees.

13. Client Service Feedback

- a. ICON welcomes feedback from visitors with disabilities so we can ensure we are meeting their needs. We welcome feedback in person, in writing, email or using our [Customer Feedback Form](#).



- i. ICON is committed to responding to complaints, questions or other feedback concerning the accessibility of its client services in a timely manner.

14. Employment

- a. ICON is committed to fair and accessible employment practices. As part of our recruitment process, ICON will notify all applicants about the availability of accommodation during the recruitment process, selection and hiring process.
- b. ICON will develop Individualized Accommodation Plans for ICON employees with disabilities.
 - i. Where an employee has been absent due to a disability, ICON will develop and implement a gradual return to work process to support employees who have been absent due to a disability.
- c. Where necessary, ICON will provide customized emergency information to help an employee with a disability during an emergency.
- d. ICON will ensure that the accessibility needs of employees are taken into account during performance management, career development and the redeployment processes.

15. Enquiries

- a. Questions or concerns regarding this policy can be forwarded to ICON's Senior Vice President of Operations, Christy Plaitis, christy@iconpm.ca.
- b. This policy will be made available in an alternate format upon request and within a reasonable timeframe once requested.



Appendix A- Multi Year Plan

1.0 General Requirements

Section	Initiative	Description	Action	Status
3	Establishment of Accessibility Policies, Practices & Procedures	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.	<p>Develop accessibility policy; make available to the public.</p> <p>Provide the policy in alternative formats on request.</p> <p>Train employees.</p>	<p>Completed</p> <p>Ongoing</p> <p>Ongoing</p>
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and,</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>Establish draft.</p> <p>Identify barriers in collaboration with various departments and satellite offices.</p> <p>Senior management approval.</p> <p>Annual review for continue suitability and relevance.</p>	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Ongoing</p>
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	<p>Training included as part of the onboarding process.</p> <p>Roll out combined OHRC & AODA training.</p>	<p>Completed</p> <p>Ongoing</p>



Section	Initiative	Description	Action	Status
		<p>pertains to persons with disabilities to,</p> <p>a) all employees, and volunteers;</p> <p>b) all persons who participate in developing the organization’s policies; and,</p> <p>c) all other persons who provide goods, services or facilities on behalf of the organization.</p>		

2.0 Information and Communications Standards

Section	Initiative	Description	Action	Status
11	Feedback	<p>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>	<p>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>Determine what accessible formats and communication supports we will provide upon request.</p> <p>Ensure staff and management are aware of the need to accommodate upon request. Requests to be directed to ICON’s Senior Vice President of Operations.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>



Section	Initiative	Description	Action	Status
12	Accessible Formats & Communication Supports	<p>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,</p> <p>a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p>	<p>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</p> <p>Ensure these formats and supports can be provided in a timely manner.</p> <p>Communicate to staff and management that no <u>additional</u> charge is required or borne by the requester.</p>	<p>Completed</p> <p>Ongoing</p> <p>Ongoing</p>
12	Accessible Formats & Communication Supports	<p>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>	<p>Communicate to staff and management this required through training. Requested to be directed to ICON’s Senior Vice President of Operations.</p> <p>Develop protocol for situations where a suitable agreement cannot be made.</p>	<p>Completed</p> <p>Ongoing</p>
12	Accessible Formats & Communication Supports	<p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Have a sign posted in the reception area.</p> <p>Post on company website.</p>	<p>Completed</p> <p>Completed</p>
14	Accessible Websites & Web Content	<p>14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World</p>	<p>Install Userway Accessibility Widget to website.</p> <p>Continuously review WCAG guidelines to be</p>	<p>Completed</p> <p>Ongoing</p>



Section	Initiative	Description	Action	Status
		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.	informed of changes and updates.	

3.0 Employment Standard

Section	Initiative	Description	Action	Status
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.	Include a statement in every job posting stating our commitment in providing accommodations for persons with disabilities.	Completed
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	Notify applicants (telephone, email, letter, etc.) based on required accommodation advised.	Ongoing
			Senior Vice President of Operations is designated as the contact person to handle queries regarding accessibility.	Completed
			Identify barriers: location of interview room, room set-up for in-person interviews, interviewing timelines, supports, paperwork, etc.	Completed
				Completed



Section	Initiative	Description	Action	Status
		applicant's accessibility needs due to disability.	Develop interview script guidelines. Develop Accessible Interviewing Checklist.	Ongoing
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.	Put a statement in our notice of selection email when providing an employment offer to successful candidates.	Completed
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.	Circulate policy and training material. Upload policy and training material link to ICON Resources.	Ongoing Completed
25	Informing Employees of Supports	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Add accessibility policies to ICON's Employee Reference Manual. Include accessibility training as part of ICON's employee onboarding process.	Completed Completed
25	Informing Employees of Supports	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	Circulate policy and training material. Upload policy and training material link to ICON Resources.	Ongoing Ongoing



Section	Initiative	Description	Action	Status
		employee's accessibility needs due to disability.		
26	Accessible Formats & Communication Supports for Employees	<p>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,</p> <p>a) information that is needed in order to perform the employee's job; and.</p> <p>b) information that is generally available to employees in the workplace.</p>	<p>Functional audit of information specific to departments.</p> <p>Audit of regular communications.</p>	<p>Ongoing</p> <p>Ongoing</p>
26	Accessible Formats & Communication Supports for Employees	26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	List what the employee will require (i.e. policy communication supports that are available).	Ongoing
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	<p>Develop process for requesting individualized emergency response information.</p> <p>Workplace Emergency Response Plan. Issue reminders to staff quarterly.</p>	<p>Completed</p> <p>Ongoing</p>



Section	Initiative	Description	Action	Status
		accommodation due to the employee's disability.	Individual Persons Requiring Assistance Form. Issue quarterly calls for update.	Ongoing
			Identification of potential barriers during an emergency response.	Ongoing
27	Workplace Emergency Response Information	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.	Develop process which includes employee's consent.	Completed
27	Workplace Emergency Response Information	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.	Develop process which accounts for the timely disbursement of personalized emergency response information.	Completed.
27	Workplace Emergency Response Information	(4) Every employer shall review the individualized workplace emergency response information, a) when the employee moves to a different location in the organization;	Develop a process which prompts a reassessment of individualized workplace emergency response information with employee redeployment, changes in accommodation	Completed



Section	Initiative	Description	Action	Status
		<p>b) when the employee's overall accommodations needs or plans are reviewed; and,</p> <p>c) when the employer reviews its general emergency response policies.</p>	needs and changes in org wide policies.	
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.	Develop a process for the development of individualized accommodation plans for employees with disabilities.	Completed.
28	Documented Individual Accommodation Plans	<p>28.(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 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. The manner in which the employer can request an evaluation by an outside medical or other expert, at the 	<p>Develop an accommodation plan process which meets AODA requirements.</p> <p>Review process to ensure it continues to meet requirements.</p>	<p>Completed</p> <p>Ongoing</p>



Section	Initiative	Description	Action	Status
		<p>employer's expense, to determine if and how accommodation can be achieved.</p> <p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's</p>		



Section	Initiative	Description	Action	Status
		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> <p>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,</p> <p>b) shall document the process.</p>	<p>Develop a return to work process which meets AODA requirements.</p> <p>Review process to ensure it continues to meet requirements.</p>	<p>Completed</p> <p>Completed</p>
29	Return to Work Process	<p>29.(2) The return to work process shall,</p> <p>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,</p> <p>b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	Review current process to ensure it meets requirements, including review of job task analysis.	Ongoing
29	Return to Work Process	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.	Develop process checklist.	Ongoing
30	Performance Management	30.(1) An employer that uses performance	Review current process keeping individual	Ongoing



Section	Initiative	Description	Action	Status
		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.	accommodation plan in mind.	
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 keeping individual accommodation plan in mind.	Ongoing
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.	Review current process keeping individual accommodation plan in mind.	Ongoing