

## Drayton Entertainment Multi-Year Accessibility Plan

### Part 1: General Requirements

Initiative	Requirement	Action	Status	Compliance Date
1.1 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 completed and provided to all Drayton Entertainment staff and are posted on our website and available in alternate formats upon request.	Complete	January 1, 2014
1.2 Accessibility Plans	4. (1) Large organizations shall, <ul style="list-style-type: none"> <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>	Plan is completed and posted on the Drayton Entertainment website.	Complete	January 1, 2014
1.4 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-serve kiosks.	Drayton Entertainment does not operate self-serve kiosks.	Not Applicable	January 1, 2014
1.3 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,	Assess training needs for all levels of employment and volunteers. Make training mandatory. Record the completion of training. Ensure training for changes in policies and/or procedures.	Complete/ongoing for new hires, subject to ongoing review and additional training requirements.	January 1, 2015

	<ul style="list-style-type: none"> <li>a) All employees, and volunteers;</li> <li>b) All persons who participate in developing the organization's policies; and</li> <li>c) All other persons who provide goods, services or facilities on behalf of the organization.</li> </ul>			
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**Part 2: Information and Communication Standards**

<b>Initiative</b>	<b>Requirement</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>
2.1 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 communication supports, upon request.	Notify employees, volunteers and the general public that feedback is available and welcome in multiple formats and responses will be provided in the same format in which the feedback was received.	Complete	January 1, 2015
2.2 Accessible Formats and 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> <ul style="list-style-type: none"> <li>a) In a timely manner that takes into account the person's accessibility needs due to disability; and all persons who participate in developing the organization's policies; and</li> <li>b) At a cost that is no more than the regular cost charges to other persons.</li> </ul>	Website and onboarding communication identifies that the public and employees can request accessible formats.	Complete	January 1, 2016
	12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Drayton Entertainment will consult the individual(s) making the request to ensure an adequate response has been provided. Drayton Entertainment will develop a process	Complete	January 1, 2016

		for responding to, approving or declining a request.		
	12. (3) Every obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Added language on the Drayton Entertainment website to advise patron and job applicants that accessible format may be made available upon request.	Complete	January 1, 2016
2.3 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.		Not applicable	January 1, 2012
2.4 Accessible Websites & Web Content	14. (2) 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 sections.	Assess current web functionality to ensure compliance. Ensure that IT and Marketing are aware of AODA requirements and changes in legislation.	Web Content Accessibility Guidelines (WCAG) 2.0 Level A complete.  Web Content Accessibility Guidelines (WCAG) 2.0 Level AA ongoing.	<b>January 1, 2014</b> New internet websites and web content on those sites must conform to WCAG 2.0 Level A. <b>January 1, 2021</b> 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 (Pre-recorded)

**Part 3: Employment Standard**

<b>Initiative</b>	<b>Requirement</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>
3.1 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.	All job postings include language that states requests are available upon request. This information is also posted on the Drayton Entertainment website.	Complete	January 1, 2016
3.2 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 the provision of a suitable accommodation in a manner that takes into account the applicant accessibility needs due to disability.	Include language in all communication with applicants, notifying them that accommodations are available upon request.	Complete	January 1, 2016
3.3 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.	Include accessibility language when offer is made.	Complete	January 1, 2016
3.4 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.	Drayton Entertainment's accessibility policies, plan and processes are included in the HR Employee Handbook and on the company drive.	Complete	January 1, 2016
	(2) Employers shall provide the information required under this section to new employees as soon as practical after they begin their employment.	Accessibility training, which includes processes and policies, is included in the new employee orientation.	Complete	January 1, 2016
	(3) Employers shall provide updated information to employees whenever there is change to existing policies on the	Policy changes are communicated through email.	Complete	January 1, 2016

	provision of job accommodations that take into account an employee's accessibility needs due to a disability.			
3.5 Accessible Formats and 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, a) information that is needed in order to perform the employee's job; and b) information that is generally available to employees in the workplace.	Information on availability of accessible formats and communications supports and on the process for requesting accessible formats and communication support is found in the HR Manual and HR Policies on the company drive.	Complete	January 1, 2016
	(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Accessibility Request Form is created.	Complete	January 1, 2016
3.6 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.	Communicated to all current staff as well as all new hires during onboarding.	Complete/ongoing for new hires, subject to ongoing review.	January 1, 2012
	(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.	Communicated to all current staff as well as all new hires during onboarding.	Complete/ongoing for new hires, subject to ongoing review.	January 1, 2012
	(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for	Communicated to all current staff as well as all new hires during onboarding.	Complete/ongoing for new hires, subject to ongoing review.	January 1, 2012

	accommodation due to the employee's disability.			
	(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.	Communicated to all current staff as well as all new hires during onboarding.	Will respond when applicable.	January 1, 2012
3.7 Documented Individualized 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 documents individual accommodation plans for employees with disabilities.	The process is included in Drayton Entertainment's Accommodation Plan for Employees with Disabilities policy, accessible to all employees through the company drive and/or their supervisor.	Complete	January 1, 2016
	(2) The process for the development of documented individual accommodation plans shall include the following elements: 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 employers expense, to determine if the accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the	Under Drayton Entertainment's Accommodation Plan for Employees with Disabilities policy, employees with disabilities shall complete an Individual Accommodation Plan outlining the need for specific accommodation.	Complete	January 1, 2016

	<p>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 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 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 accessibility needs due to disability.</p>			
3.8 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 accommodation in order to return to work; and</p> <p>b) shall document the process.</p>	The process is included in Drayton Entertainment's Return to Work policy.	Complete/subject to ongoing review.	January 1, 2016
	(2) The return to work process shall,	The process is included in Drayton	Complete/subject to ongoing	January 1, 2016

	<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 documented individual accommodation plans as part of the process</p>	Entertainment's Return to Work policy.	review.	
3.9 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.	This is indicated in Drayton Entertainment's Accessibility for Ontarians with Disabilities Act (AODA) policy; Employment Standards policy and communicated to Management.	Complete	January 1, 2016
3.10 Career Development and 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.	This is indicated in Drayton Entertainment's Accessibility for Ontarians with Disabilities Act (AODA) policy; Employment Standards policy and communicated to Management.	Complete	January 1, 2016
3.11 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.	This is indicated in Drayton Entertainment's Accessibility for Ontarians with Disabilities Act (AODA) policy; Employment Standards policy and procedures are discussed with Management.	Complete	January 1, 2016

#### Part 4: Design of Public Spaces Standard

Initiative	Requirement	Action	Status	Compliance Date
4.1 Outdoor Public Use Eating Areas	80.17 Obligated organizations shall ensure that where they construct or redevelop public use eating areas that	When constructing or redeveloping public use eating areas, the Outdoor Public Use Eating Areas standards	Will be addressed if/when there is construction or redevelopment of public	Any build or redesign after January 1, 2017



	they intend to maintain, the outdoor public use eating areas meet the requirements in the Design of Public Spaces Standard.	will be met.	eating areas.	
4.2 Exterior Paths of Travel	80.22 Obligated organizations shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set out in this Part, O. Reg. 413/12, s. 6.	When constructing or redeveloping exterior paths of travel, the Exterior Paths of Travel standards will be met.	Will be addressed if/when there is construction or redevelopment of exterior paths of travel.	Any build or redesign after January 1, 2017
4.3 Accessible Parking	80.32 Newly constructed and redeveloped off street and on-street parking must comply with the accessibility requirements in the Design of Public Spaces Standard.	When constructing or redeveloping off street and on-street parking, the Accessible Parking standards will be met.	Will be addressed if/when there is construction or redevelopment of off street and on-street parking.	Any build or redesign after January 1, 2017
4.4 Service Counters, Fixed Queuing Guides and Waiting Areas	80.40 Newly constructed and redeveloped service counters, fixed queuing guides and waiting areas must comply with the accessibility requirements in the Design of Public Spaces Standard.	When constructing or redeveloping service counters, fixed queuing guides and waiting areas, the Service Counters, Fixed Queuing Guides and Waiting Areas standards will be met.	Will be addressed if/when there is construction or redevelopment of service counters, fixed queuing guides and waiting areas.	Any build or redesign after January 1, 2017
4.5 Maintenance of Accessible Elements	80.44 In addition to the accessibility plan set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following: <ol style="list-style-type: none"> <li>1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.</li> <li>2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.</li> </ol>	When maintaining or disrupting accessible features or services, the public will be notified through onsite signage, social media, and Drayton Entertainment’s website. Alternative accessible measures will be provided, where possible.	Complete/ongoing	January 1, 2017