



Accessibility for Ontarians with Disabilities Act, 2005

Shangri-La Hotel, Toronto: Accessibility Policies and Multi-Year Accessibility Plan

Review Date: February 1, 2015

PURPOSE

The *Integrated Accessibility Standards* (the “IAS”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “AODA”) require that effective January 1, 2014, the Shangri-La hotel, Toronto (“the Shangri-La”) establish, implement, maintain and document its accessibility policies and multi-year accessibility plan (the “Accessibility Plan”), which outlines the Shangri-La’s strategy to prevent and remove barriers for persons with disabilities and meet its obligations under the IAS.

The Accessibility Plan will be posted on the Shangri-La’s website and will be available in an accessible format upon request. The Accessibility Plan will be reviewed and updated, if applicable, at least once every five years.

SCOPE

The Accessibility Plan applies to all employees and clients of the Shangri-La, and, where indicated, to the Shangri-La’s independent contractor representatives.

COMMITMENT

The Shangri-La promotes integration and equal opportunity and is committed to meeting the needs of people with disabilities in a timely manner. The Shangri-La seeks to achieve this commitment by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

This Accessibility Plan outlines the Shangri-La’s strategies to achieve accessibility generally and meet IAS requirements in the following areas:

1. Workplace Emergency Response Information;
2. Training;
3. Information and Communication;

4. Employment; and
5. Design of Public Spaces Standards
6. Contact Information

ACCESSIBILITY STANDARDS

1. Workplace Emergency Response Information

Where the Shangri-La is aware that an employee has a disability and there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as required and as soon as practicable.

Action Taken

The following measures were implemented by the Shangri-La effective December 1, 2014:

- individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- emergency response information forms have been prepared for employees who have disclosed a disability and who are being accommodated according to their disabilities;
- where required and with the employee's prior consent, the Shangri-La provides assistance to employees with disabilities during workplace emergencies or disasters. Plans for such assistance have been set out in individualized emergency plans;
- individualized emergency plans have been communicated to the employees' respective managers and safety personnel on an 'as needed' basis; and
- on a regular, ongoing basis, and as per the applicable terms of the IAS, the Shangri-La reviews and assesses general workplace emergency response procedures and individualized emergency plans to ensure accessibility issues are addressed.

2. Training

The Shangri-La is committed to providing training on the requirements of the accessibility standards referred to in the IAS and on the *Human Rights Code*, as it pertains to persons with disabilities.

Planned Action

In accordance with the IAS, the Shangri-La will:

- ensure that appropriate training on the requirements of the IAS and the *Human Rights Code* as it pertains to persons with disabilities is provided as soon as practicable to all employees, independent contractor representatives, volunteers, third-party service providers who provide services related to products, services and facilities on the Shangri-La's behalf, and persons participating in the development and approval of the Shangri-La's policies;

- maintain records of the training provided, including training dates and records of individuals to whom training was provided; and
- ensure that training is provided on any changes to the Shangri-La's policies on an ongoing basis.

Required Legislative Compliance: January 1, 2015

3. Information and Communication

The Shangri-La is committed to making its information and communications accessible to persons with disabilities. The Shangri-La will adhere to accessibility requirements under IAS standards to ensure that information and communications systems and platforms are accessible and, upon request, provided in formats that meet the needs of persons with disabilities.

Feedback, Accessible Formats and Communication Supports

Planned Action

In accordance with the IAS, the Shangri-La will:

- ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner;
- as a general principle, where accessible formats and communication supports for persons with disabilities are requested:
 - provide or arrange for the provision of such accessible formats and communication supports;
 - consult with the person making the request to determine the suitability of the accessible format or communication support;
 - provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons; and
- notify the public of the availability of accessible formats and communication supports.

Required Legislative Compliance: January 1, 2015 for feedback and January 1, 2016 for accessible formats and communication supports.

Accessible Websites and Web Content

Planned Action

In accordance with the IAS, the Shangri-La will work toward making its websites and web content conform with the World Wide Consortium Web Content Accessibility Guidelines (WCAG 2.0) Level AA.

Required Legislative Compliance: January 1, 2014 for WCAG 2.0 Level A – new Internet websites and web content: and January 1, 2021 for WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IAS.

4. Employment

Recruitment

The Shangri-La is committed to fair and accessible employment recruiting practices that include providing accessibility across all stages of the employment cycle.

Planned Action

In accordance with the IAS, the Shangri-La will do the following:

(i) Recruitment General

The Shangri-La will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

- reviewing and, as necessary, modifying existing recruitment policies, procedures and processes; and
- advising that accommodation is available for applicants with disabilities on the Shangri-La's website and in job postings.

(ii) Recruitment, Assessment and Selection

When applicants are selected to participate in an assessment or selection process, the Shangri-La will notify them that accommodations are available upon request in relation to the materials or processes used in the assessment/selection process. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes;
- inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment; and
- consultation with applicants who request accommodation and arrangement for provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs.

(iii) Notice to Successful Applicants

When making offers of employment, the Shangri-La will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

- review and, as necessary, modification of existing recruitment policies, procedures and processes; and

- inclusion of notification of the Shangri-La's policies on accommodating employees with disabilities in offer of employment letters.

Required legislative compliance: January 1, 2016

Provision of Accessible Formats and Communications Supports

In accordance with the IAS, the Shangri-La will inform all employees of policies that support employees with disabilities, including but not limited to policies on the provision of job accommodations that take employees' accessibility needs into account. This will include:

- informing current employees and new hires of the Shangri-La's policies;
- providing information as soon as practicable after a new employee begins employment, preferably in the orientation process;
- keeping employees up to date on changes to existing policies on job accommodations with respect to disabilities;
- providing or arranging for provision of accessible formats and communications supports, upon request, for:
 - information that is needed in order to perform an employee's job;
 - information that is generally available to employees in the workplace; and
- in meeting the obligations to provide the information that is set out above, the Shangri-La will consult with the requesting employee in determining the suitability of accessible formats or communications supports.

Required legislative compliance: January 1, 2016

Documented Individual Accommodation Plans/Return to Work Process

The Shangri-La will incorporate new accessibility requirements under the IAS to ensure that barriers in accommodation and return to work processes are eliminated and corporate policies surrounding accommodation and return to work are followed, where applicable.

Planned Action

The Shangri-La's existing policies include steps that the Shangri-La will take to accommodate employees with disabilities and facilitate employees' return to work after absence due to disability. The Shangri-La will review and assess existing policies to ensure they include a process for the development of documented individual accommodation plans for employees with disabilities, as required.

In accordance with the provisions of the IAS, the Shangri-La will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the employee requesting accommodation can participate in the development of the plan;
- information regarding the means by which the employee is individually assessed;

- information regarding the manner in which the Shangri-La can request an evaluation by an outside medical or other expert, at the Shangri-La's expense, to assist in determining if and how accommodation can be achieved;
- steps to protect the privacy of employees' personal information;
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done;
- reasons for denial where an individual accommodation plan is denied;
- information regarding the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs; and
- identify any other accommodation that is to be provided to the employee.

The following will be included where individual accommodation plans are established:

- any individualized workplace emergency response information that is required; and
- any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
 - information necessary to perform the employee's job; and
 - information generally available to employees in the workplace.

The Shangri-La will ensure that the return to work process as set out in its existing policies outlines:

- steps the Shangri-La will take to facilitate return to work after a disability-related absence;
- development of a written individualized return to work plan for employees; and
- the use of individual accommodation plans in the return to work process.

Required Legislative compliance: January 1, 2016

Performance Management, Career Development and Redeployment

The Shangri-La will 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;
- when providing career development and advancement opportunities to employees with disabilities; and
- when redeploying employees with disabilities.

Planned Action

In accordance with the IAS, the Shangri-La will:

- review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IAS;

- take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:
 - assessing performance;
 - managing career development and advancement; and
 - redeployment, as required.
- review, assess and, as necessary, include accessibility criteria in performance management workshops;
- take into account the accessibility needs of employees with disabilities when providing career development and advancement, including notification of the ability to provide accommodations on internal job postings; and
- take into account the accessibility needs of employees with disabilities when redeploying employees, including review and modification of employee transfer checklist, as required.

Required legislative compliance: January 1, 2016

5. Design of Public Space Standards

The Shangri-La is committed to incorporating barrier-free design principles into public spaces that are newly constructed and redeveloped on or after January 1, 2017, as set out in the IAS.

6. Contact Information

For more information on this Accessibility Plan or for accessible formats of the Accessibility Plan, please contact the Shangri-La as follows:

Julian Darisse, Director of Rooms
julian.darisse@shangri-la.com

Shangri-La hotel, Toronto
188 University Avenue
Toronto, ON M5H 0A3
Tel: 647-788-8888