



## **INTEGRATED ACCESSIBILITY STANDARD POLICIES AND MULTI-YEAR ACCESSIBILITY PLAN**

---

### **Accessibility Plan and Policies for Liberty Entertainment Group**

This 2014-21 accessibility plan outlines the policies and actions that Liberty Entertainment Group will put in place to improve opportunities for people with disabilities and meet accessibility requirements under the Accessibility for Ontarians with Disabilities Act (Integrated Accessibility Standards).

---

### **PURPOSE**

#### **Integrated Accessibility Standards Regulation (IASR)**

Integrated Accessibility Standards Regulation establishes accessibility standards and introduces requirements for Information and Communications, Employment, Transportation and the Design of Public Spaces. It also establishes the compliance framework for obligated organizations and applies to all public, private and not-for-profit organizations, with at least one employee. This regulation is now law and the requirements currently in regulation are being phased in between 2011 and 2021.

#### **Ontario Human Rights Code**

Liberty Entertainment Group has current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. The IASR does not replace or affect existing legal obligations under the Ontario Human Rights Code and other laws in respect to accommodation of people with disabilities.

The Ontario Human Rights Code and the Accessibility for Ontarians with Disabilities Act (AODA) both deal with accessibility, but are two very different pieces of legislation. The Ontario Human Rights Code is an individual, complaints-based legislation that addresses discrimination. The IASR, created under the AODA, applies to all organizations in Ontario and will increase accessibility for all.

The Ontario Human Rights Code requires organizations to accommodate people with disabilities to the point of undue hardship. The IASR does not replace or affect legal rights or obligations that arise under the Ontario Human Rights Code and other laws relating to the accommodation of people with disabilities. This means that the Ontario Human Rights Code or other applicable legislation may require additional accommodation measures that go beyond or are different from the standards established by the regulations of the AODA.



## **SCOPE AND RESPONSIBILITIES**

This plan has been drafted in accordance with the Regulation and addresses how Liberty Entertainment Group achieves accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that will be followed to provide accessibility supports to Ontarians with disabilities. Please note that while accessibility principles and efforts apply to and will be followed by all Liberty Entertainment Group venues, the specifics of this plan document apply only to locations with 50 or more employees as per the regulation.

The requirements of the Regulation include the following five items:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- Posting of the accessibility plan on Liberty Entertainment Group website and provide the plan in an accessible format upon request;
- Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- Training and other specific requirements under the Information and Communications and Employment Standards; and
- Review and update of the accessibility plan at least once every five years.

## **POLICY STATEMENT AND ORGANIZATIONAL COMMITMENT**

Liberty Entertainment Group is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity, and support the full inclusion of persons as set out in Canadian Charter of Rights and Freedoms, and the Accessibility for Ontarians with Disabilities Act, 2005.

Liberty Entertainment Group shall use every effort to ensure that we meet the needs of the people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements.

## **MULTI-YEAR ACCESSIBILITY PLAN**

### **A. Training**

Liberty Entertainment Group will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.



Liberty Entertainment Group will take the following steps to ensure employees are appropriately trained:

- Determine the training requirements of the IASR and the Ontario Human Rights Code as it pertains to people with disabilities and ensure it is provided to all team members, volunteers and persons developing organizational policies;
- Ensure training is provided to the above noted individuals as soon as practicable;
- Maintain training dates and the number of individuals who are trained;
- Ensure training is provided on any related policy changes.

**Required Legislative Compliance Date:** January 01, 2015

**Completion Date:** In progress

## **B. Information and Communications**

Liberty Entertainment Group is committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

Liberty Entertainment Group is also committed to providing publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when requested.

### **i. Accessible Emergency Information**

Liberty Entertainment Group is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

If Liberty Entertainment Group prepares emergency procedures, plans or public safety information and makes the information available to the public, we shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.



## **ii. Feedback, Accessible Formats and Communication Supports**

Liberty Entertainment Group has a policy and process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request.

In addition, in accordance with the IASR, Liberty Entertainment Group will provide or arrange for accessible formats and communication supports for persons with disabilities:

- Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- Consult with the person making the request and determine suitability of an accessible format or communication support;
- Notify the public about the availability of accessible formats and communication supports.

**Required Legislative Compliance Date: Feedback** - January 1, 2015

**Accessible Formats & Communication Supports** - January 1, 2016

**Completion Date:** In progress

## **iii. Website Accessibility**

Liberty Entertainment Group shall take the following steps to make its internet website 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:

- Ensure that any web content developed internally or externally meets the Information and Communication Standard and that content developers/vendors have the necessary expertise to develop such content;
- Ensure that by January 1, 2021 all internet website and web content backdated to 2012 conforms to WCAG 2.0 Level AA.

Liberty Entertainment Group is happy to provide the eSSENTIAL Accessibility™ tool set on the Liberty Entertainment Group website. The application features an array of keyboard and mouse replacement solutions (alternative input methods including a webcam-based hands-free movement tracking system) that allow guests with physical limitations to access our website. It also includes a web page reader. The application can be downloaded and installed on a standard PC and used by anyone who has difficulty typing, moving a mouse or reading a web page.

**Required Legislative Compliance Date: WCAG 2.0 Level A** - January 1, 2014

**WCAG 2.0 Level AA** - January 1, 2021

**Completion Date:** In progress



## **C. Employment**

Liberty Entertainment Group is committed to fair and accessible employment practices.

### **i. Recruitment**

We will take the following steps to notify the public and staff that, when requested, Liberty Entertainment Group will accommodate people with disabilities during the recruitment, selection and hiring processes and when people are hired:

- We will advise the public and employees through public recruitment website that, when requested, we will accommodate people with disabilities;
- Notify successful applicants of the policies for accommodating team members with disabilities;
- Incorporate this requirement into HR policies and make available to all employees.

### **ii. Individual Accommodation Plan and Return to Work**

Liberty Entertainment Group will take the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- If an employee requests for an accommodation, we will consult with the employee and arrange for the provision of a suitable accommodation that takes into account the employee's disability;
- Whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

### **iii. Performance Management , Career Development and Redeployment**

We will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if Liberty Entertainment Group is using performance management, career development and redeployment processes:

- Review internal policies and procedures to ensure they are in compliance with the IASR;
- Take into account the accessibility needs of team members with disabilities and, as applicable, their Individualized Accommodation Plans when:
  - Assessing performance;
  - Managing career development and advancement, including notification of the ability to provide accommodations on internal job postings; and/or
  - Redeployment is required.



#### **iv. Accessibility Barriers Prevention and Removal**

Liberty Entertainment Group recognizes that identifying and removing barriers to accessibility is crucial to meeting the requirements of AODA as well as creating a culture of accessibility within its organization. Staff, clients and customers as well as members of the community will be able to provide feedback and assist with the identification of barriers to accessibility.

We are committed to integration and equal opportunities for all people in order to allow them to maintain their dignity and independence.

**Required Legislative Compliance Date:** January 1, 2016

**Completion Date:** In progress

#### **v. Work Place Emergency Response Information**

Liberty Entertainment Group will provide individualized workplace emergency response information to employees who have a disability for the four points below:

- 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;
- If the employee who receives individual workplace emergency response information requires assistance, Liberty Entertainment Group will provide the workplace emergency information to the person designated, by consent, by Liberty Entertainment Group;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- Review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

**Required Legislative Compliance Date:** January 1, 2012

**Completion Date:** January 1, 2012

#### **vi. For more information**

For more information on this accessibility plan, and to receive accessible formats of this document, please contact the HR department at:

- Phone: (416) 542-3789
- Email: [hr@libertygroup.com](mailto:hr@libertygroup.com)
- Address: 25 British Columbia Road, Toronto, ON M6K 3C3