



## Heart & Crown Irish Pubs Multi-Year Accessibility Plan

### Introduction & Statement of Commitment

The Integrated Accessibility Standard Regulation (IASR) under the Accessibility for Ontarians with Disabilities Act (AODA) requires the Heart & Crown Irish Pubs to develop a multi-year plan every five years to prevent and remove barriers for persons with disabilities.

Every five years, the Heart & Crown Irish Pubs sets a course to prevent, identify and remove barriers for persons with disabilities. Through its multi-year accessibility plan, Heart & Crown Irish Pubs aims to become barrier-free by 2025.

This course includes complying with the following accessibility standards in:

- Customer Service
- Information & Communications
- Employment
- Transportation
- The Built Environment

The 2019-2024 accessibility plans will help to inform planning requirements under the IASR (Integrated Regulation) enacted July 1, 2011 under the AODA. The AODA requires the Heart & Crown Irish Pubs to develop, implement, and enforce accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures, and premises are accessible to persons with disabilities.

The multi-year accessibility plan outlines the specific steps Heart & Crown Irish Pubs is taking to improve opportunities for persons with disabilities and comply with the phased-in requirements of the Regulation beginning January 1, 2012.

Heart & Crown Irish Pubs remains committed to improving accessibility through the identification, removal and prevention of barriers in our organization. Working with our employees and with our customers ensures that accessibility is given significant consideration.

This plan has been developed by the Heart & Crown Irish Pubs in accordance with the Integrated Regulation. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA. It will be provided in an alternative format upon request.

In accordance with the requirements, Heart & Crown Irish Pubs will:

- Provide all information relating to the plan in alternative formats upon request
- Review and update the plan at least once every five years

## **Section One: Report on measures already implemented to identify, remove, and prevent barriers 2019-2024**

From 2019-2024, Heart & Crown Irish Pubs will continue to comply with the Accessibility Standards for Customer Service Regulation and continue to implement initiatives to enhance accessibility in other areas under the Integrated Accessibility Standards Regulation – Standards for Employment, Information, and Communications, and Transportation. When the Accessibility Standards for the Built Environment becomes law, the same will apply.

This section includes a summary of the initiatives Heart & Crown Irish Pubs implemented on or before January 1, 2012 and will continue to implement from 2019-2024.

### **1. Standards for Customer Service**

Heart & Crown Irish Pubs met compliance with the requirements set out in the Accessible Customer Service Standard Regulation by:

- Establishing policies, procedures and practices for providing goods and services to persons with disabilities, and making these available to the public in each restaurant and through the corporate website
- Providing accessibility awareness, AODA and customer service standard training to all staff who interact, or may interact, with persons with disabilities on behalf of the company or are involved in the creation and implementation of policies, practices and procedures for the company
- Reviewing customer service feedback forms in print and online as well as providing alternate formats in large print and text formats upon request
- Working with the building manager and landlord to develop a notification service disruption protocol, and communicated the customer service policy to staff so that support persons and service animals are permitted onto the Heart & Crown Irish Pubs premises
- Providing a way to request accessibility information on the corporate website to communicate the customer service policy and provide instructions for enhanced accessibility offerings
- Creating a customer service policy that highlights information about accessibility requirements under the AODA including policies, guidelines and mandatory training requirements for staff and management
- Reporting compliance to the customer service standard on the Accessibility Compliance Reporting Tool at Service Ontario's ONE-Source for Business website
- Tracking attendance for accessibility training programs
- Communicating through policies about the best ways to plan accessible events for customers

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

**Completion Date:** January 1, 2012

## **2. Emergency response and evacuation plans under the IASR Standards for Information and Communications and Employment**

Heart & Crown Irish Pubs incorporated accessibility considerations into its emergency response and evacuation plan and procedures. The following measures were taken:

- Instructions were provided to staff regarding evacuation in times of emergency to gather at locations that are accessible
- Persons with various disabilities were consulted to ensure we meet the needs of all persons with disabilities in our emergency response plan, and that public safety information and instructions are provided in a timely manner if an emergency or disaster occurs
- Fire and disaster wardens were instructed to identify persons in need of assistance in advance of an emergency to discuss the location of the designated waiting areas and how identified persons will be escorted out
- The emergency response plan and public safety information and instructions were reviewed and modified to take the needs of persons with various disabilities into consideration
- The emergency response plan and public safety information is available to the public in an accessible format or with appropriate communication supports upon request
- In cooperation with our building manager, the emergency procedures have been updated to ensure they can be followed by customers or employees with disabilities
- Individualized workplace emergency response information has been made available to employee's who have disclosed a disability, and such employees will be accommodated according to their disability when and if an emergency or disaster occurs. These individualized plans have been communicated to their managers and recorded in their personnel files
- Employees have been trained on the emergency response plan and/or public safety information and instructions to ensure that they know how to interact with persons with disabilities during an emergency, incident or dangerous situation
- Individualized emergency response information is reviewed when:
  - a) An employee moves to a different locations in the organization
  - b) An employee's overall needs or plans are reviewed; and
  - c) When reviewing general emergency response policies

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

No employees with disabilities at present. Will be addressed on an individual basis as need arises

**Completion Date:** January 1, 2012

## **Section Two: Report on planned measures to identify, remove and prevent barriers in 2019-2024**

The Heart & Crown Irish Pubs accessibility plans focuses on five areas. These initiatives will support compliance with the existing Accessibility Standards for Customer Service. This will also help us enhance accessibility in other areas - information and communications, employment, transportation, and the build environment.

### **1. Standards for Customer Service**

Heart & Crown Irish Pubs is committed to ensuring that people with disabilities continue to receive accessible goods and services beyond January 1, 2012. This means they will receive goods and services with the same high quality and timeliness as others as per the customer service policy issued January 1, 2012.

#### **Commitment**

Heart & Crown Irish Pubs has adopted the accessible customer service policy and procedures.

#### **Identification of Barriers**

People with disabilities face a range of physical and attitudinal barriers including stereotyping and prejudice. Inadequate resources and the lack of common objectives with regards to accessibility and equity seriously curb efforts to remove barriers.

Heart & Crown Irish Pubs has identified that we do have customers who are physically disabled and communication barriers do exist.

Heart & Crown Irish Pubs will look at finding and implementing assistive devices or technological enhancements to our information and communication and website for the purpose of improving interaction and communication with persons who are physically disabled.

Some areas of the organization do not have appropriate signage for wayfinding

#### **Planned Action(s)**

To meet ongoing compliance with the Accessibility Standards for Customer Service Regulation requirements and removal of barriers to persons with disabilities, Heart & Crown Irish Pubs will:

- Continue to highlight the Customer Service Policy in education, training and activities
- Review the company's existing feedback process and incorporate more efficient tracking and response mechanisms for accessibility-related feedback

- Consider accessibility-related feedback received through all channels (i.e. online feedback, correspondence, inquiries etc.) by assessing and responding to feedback as required
- Remind the building manager and landlord of the building-specific service disruption notification protocols
- Assess premises and other areas where barriers may exist that prevent customer access to our goods and services
- Review effectiveness of policy, procedures and practices and make necessary adjustment
- Review training requirements for staff who have high interaction with the public; retrain the customer service policy and procedures, the law and any general or existing accessibility matters
- Continue to track and report on training compliance on an annual basis
- Implement and promote awareness of TTY technology to communicate with someone who is deaf, deafened or hard of hearing. Train employees on how to use TTY and communicate the existence on this assistive device to customers
- Encourage staff to consider accessibility when planning meetings and events with customers, including vendors and suppliers
- Use visual or tactile signs to identify branding and to display posters, signage and brochures
- Improve emergency evacuations procedures for deaf persons
- Provide appropriate accessible wayfinding signage and instruction to customers and visitors
- Update customer service policy on providing services to people with disabilities in regards to accessible formats under the Integration Regulation

**Required Legislative Compliance:** None

**Implementation Timeframe:** January 2015 - January 2016

**Completion Date:** January 1, 2016

## 2. Standards for Integrated Accessibility general requirements

### 2.1. Accessibility policy and statement of commitment to IASR Commitment

To implement a statement of commitment and policy on how Heart & Crown Irish Pubs will achieve accessibility through meeting the IASR's requirements.

#### Identification of Barriers

Heart & Crown Irish Pubs will assess physical, attitudinal and communication barriers across the company to ensure we remove and prevent barriers to access for persons with disabilities in our organization.

#### **Planned Action(s)**

- Draft a policy that addresses how the Heart & Crown Irish Pubs will achieve or has achieved accessibility through meeting the IASR's requirements
- Heart & Crown Irish Pubs Integrated Accessibility Standards Regulation policy and statement of commitment will be made available to the public on the premises and on the corporate website
- Heart & Crown Irish Pubs Integrated Accessibility Standards Regulation policy and statement of commitment will be made available in an accessible format upon request. We will consult with the person with a disability when identifying the appropriate format

**Required Legislative Compliance:** January 1, 2014

**Completion Date:** January 1, 2014

## **2.2. Accessibility plan maintenance**

### **Commitment**

To implement a multi-year accessibility plan on how Heart & Crown Irish Pubs will create an accessible environment for customers and adhere to the requirements set forth by the IASR.

### **Identification of Barriers**

People with disabilities face a variety of barriers which the Heart & Crown Irish Pubs is committed to remove to permit the free flow of our goods and services to all patrons. The prevention and removal of barriers requires a long term strategic plan to properly identify and address these concerns.

#### **Planned Action(s)**

- Establish, implement and maintain a multi-year accessibility plan, which outline the Heart & Crown Irish Pubs strategy to prevent and remove barriers and meet its IASR requirements
- Post the accessibility plan on the organizations website and provide the plan in accessible format upon request
- Review and update the accessibility plan at least once every five years

**Required Legislative Compliance:** January 1, 2014

**Completion Date:** January 1, 2014

## 2.3. Procurement or acquisition of goods, services, or facilities

### Commitment

To implement a process for the procurement or acquisition of goods, services or facilities through meeting the Integrated Regulation requirements

Incorporate accessibility criteria and features when procuring or acquiring goods and services

### Identification of Barriers

Assess existing purchasing and procurement policies for barriers to access to goods, services and facilities provided by the organization.

### Planned Action(s)

Heart & Crown Irish Pubs will:

- Distribute letter to key stakeholders recommending corrective actions or changes to procedures or purchasing criteria
- Put a process in place to:
  - Use accessibility criteria and features when procuring or acquiring goods, services or facilities, except when it is not practical to do so
  - Upon request, provide an explanation when it is not practical to do so
  - Make premises fully accessible

**Required Legislative Compliance:** Not required

**Implementation Timeframe:** January 201 - January 2024

**Completion Date:** N/A

## 2.4. Self-serve kiosks

### Commitment

To implement a process for making features of the self-serve kiosks accessible through meeting the IASR requirements

### Identification of Barriers

Heart & Crown Irish Pubs employs self-service ABM kiosks which may be difficult to access or use by persons with a disability.

## **Planned Action(s)**

Heart & Crown Irish Pubs will put a process into place to:

- Use accessibility criteria and features when acquiring and using self-service ABM machines, except where it is not practical to do so
- Upon request, provide an explanation when it is not practical to do so

**Required Legislative Compliance:** January 1, 2014

**Completion Date:** January 1, 2014

## **2.5. Training**

### **Commitment**

Heart & Crown Irish Pubs will implement a process for ensuring that all employees, volunteers, persons who deal with customers and the public on the company's behalf, and persons participating in the development and approval of the company's policies, practices and procedures receive the appropriate training that meets the requirements under the Integrated Regulation.

### **Identification of Barriers**

Ensuring meetings and training sessions are accessible for employees with learning and other disabilities.

## **Planned Action(s)**

Heart & Crown Irish Pubs will:

- Provide training on the requirements of the Integrated Regulation and on the Human Rights Code as it pertains to persons with disabilities to all employees, volunteers, contractors, other third parties who interact with persons with disabilities on behalf of the company and persons involved in the creation of policies
- Keep and maintain a record of the dates when training is provided and the number of individuals whom it was provided
- Ensuring training is provided on the requirements of the accessibility standards
- Provide training in respect to any changes to policies on an ongoing basis

**Required Legislative Compliance:** January 1, 2015

**Completion Date:** January 1, 2015



### **3. Standards for Information & Communication**

Heart & Crown Irish Pubs is committed to making company information and communications accessible to people with disabilities. The information we provide and the ways we communicate are key to delivering our goods, programs and services to the public.

#### **Focus**

Access to information involves matters relating to format and availability of content, including the means of access and technologies associated with it. While access to publications and information is usually the responsibility of the Human Resources department, there are also related responsibilities in all departments in addition to individuals involved in the creation of publications and websites, such as promotions, marketing and communications.

#### **Commitment**

Heart & Crown Irish Pubs will incorporate new accessibility requirements under the information and communications standard to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that's meet the needs of personal with disabilities. Heart & Crown Irish Pubs will endeavor to provide necessary communication supports in a timely manner.

#### **Identification of Barriers**

Heart & Crown Irish Pubs will assess its communication methods and attitudes to identify and remove barriers to information and communications with people with disabilities. Potential barriers include:

- Lack of website accessibility standards for the organization's websites
- Lack of a method to obtain user feedback on accessibility
- Lack of awareness among the organization's web developers regarding website accessibility barriers
- Information overload and conflicting recommendations for website accessibility standards
- Inaccessible PDF documents and forms
- Inaccessible HTML forms

In addition, a barrier identification assessment will be conducted in 2015 to identify attitudinal and communication barriers, recommend solutions and categorize barrier removal status as short, mid, or long term.

#### **Planned Action(s)**

To meet compliance with the Accessibility Standards for Information and Communications under IASR requirements and remove barriers to persons with disabilities, Heart & Crown Irish Pubs will:

- Upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs
- Identify problems and provide recommendations for PDF documents and forms
- Provide specific instructions to web developers on how to best create HTML forms
- Post the accessibility plan on the company's website
- Post a statement on the website about accessibility and the availability of accessible formats and communication supports
- Establish an online survey for users with a disability to provide feedback on web accessibility
- Review a wide range of materials and identify key tools and resources appropriate for the organization
- Provide, upon request, accessible formats and communication supports for receiving and responding to feedback from persons with disabilities
- Recode and deploy coding changes to enhance accessibility
- Plan to provide a link at the bottom of all web pages with an accessibility statement and a site containing tips on how to use the website
- Ensure new internet websites and web content on those sites conform to WCAG 2.0 Level AA other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded)

#### **Feedback**

- Ensure that 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
- Consult the person making the request to determine suitability of format
- Notify the public about the availability of accessible formats and communication supports

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

**Implementation Timeframe:** January 1, 2014 to January 1, 2016

**Completion Date:** October 15, 2015

#### **4. Standards for Employment**

Heart & Crown Irish Pubs is committed to fair and accessible employment practices that attract and retain talented employees with disabilities.

#### **4.1. Recruitment**

##### **Commitment**

Heart & Crown Irish Pubs will incorporate new accessibility requirements under the employment standard to ensure that barriers in recruitment are eliminated and corporate policies are followed where applicable.

##### **Identification of Barriers**

Heart & Crown Irish Pubs will assess recruitment policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

##### **Planned Action(s)**

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities in recruitment, Heart & Crown Irish Pubs will:

- On the company's website and in job advertisements, specify that accommodation is available for applicants with disabilities
- Notify employees and the public about the availability of accommodation in its recruitment processes for applicants with disabilities
- Inform candidates about the availability of accommodations:
  - when called for an interview
  - during the selection process
  - at the time of job offer
  - at orientation
- If the selected applicant requests an accommodation, consult with the applicant and arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs
- When making offers of employment, notify the successful applicant of policies for accommodating employees with disabilities

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

**Implementation Timeframe:** January 1, 2014 to January 1, 2016

**Completion Date:** August 20, 2015

## 4.2. Support information for employees

### Commitment

Heart & Crown Irish Pubs will incorporate new accessibility requirements under the Employment Standard to ensure that barriers in information that supports employees are eliminated and corporate policies are followed where applicable.

### Identification of Barriers

Heart & Crown Irish Pubs will assess its supporting documents, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

### Planned Action(s)

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, Heart & Crown Irish Pubs will:

- Inform current employees and new hires soon after they begin employment of Heart & Crown Irish Pubs policies 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
- Provide information under this section to new employees as soon as practicable after they begin their employment
- Keep employees up to date on changes to policies
- Provide accessible formats and communication supports to any employees who request them. If requested, the employer will consult with the employee to provide or arrange for provision of accessible formats and communication supports for:
  - information that is needed in order to perform the employee's job
  - information that is generally available to employees in the workplace

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

**Implementation Timeframe:** January 1, 2014 to January 1, 2016

**Completion Date:** January 1, 2015

## 4.3. Documented individualized plans (i.e. return to work plan, accommodation plan)

### Commitment

Heart & Crown Irish Pubs will incorporate new accessibility requirements under the employment standard to ensure that barriers in accommodation and other plans that support employees are eliminated and corporate policies are followed where applicable.

### **Identification of Barriers**

Heart & Crown Irish Pubs will assess its return to work and accommodation plans, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

### **Planned Action(s)**

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and remove barriers to persons with disabilities, Heart & Crown Irish Pubs will:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan
- Include in the process the means by which the employee is assessed on an individual basis
- Provide an individualized accommodation plan in writing to any employee with a disability
- Include in the process the manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if and how accommodation can be achieved
- Provide an individualized return to work plan in writing for any employee who has been absent from work due to a disability and requires disability related accommodations to return to work
- Take steps to protect the privacy of the employee's personal information
- Outline the frequency in which the individual accommodation plans will be reviewed and updated and the manner in which it can be done
- Provide the employee with the reasons for the denial if the individual accommodation plan is denied
- Include in the process the means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs
- Include any individualized workplace emergency response information
- Identify any other accommodation that is to be provided to the employee

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

**Implementation Timeframe:** January 1, 2014 to January 1, 2016

**Completion Date:** January 1, 2016

#### 4.4. Performance assessment, career development and advancement, and redeployment

##### Commitment

Heart & Crown Irish Pubs will incorporate new accessibility requirements under the employment standard to ensure that barriers in performance assessment, career development and advancement, and redeployment are eliminated and corporate policies are followed where applicable.

##### Identification of Barriers

Heart & Crown Irish Pubs will assess its performance reviews, career development and advancement, redeployment programs, policies, practices and procedures, methods and attitudes to identify and remove barriers to employment of people with disabilities.

##### Planned Action(s)

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, Heart & Crown Irish Pubs will:

- Take the accessibility needs of employees with disabilities and other individualized accommodation plans into account:
  - when assessing their performance
  - in managing their career development and advancement
  - when deploying them
- Review and revise its performance review policy
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities
- Take into account the accessibility needs of employees with disabilities when redeploying employees

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

**Implementation Timeframe:** January 1, 2014 to January 1, 2016

**Completion Date:** January 1, 2016

#### 5. Standards for Transportation

This standard does not apply to the Heart & Crown Irish Pubs

## 6. Standards for the Built Environment

### Commitment

Heart & Crown Irish Pubs is committed to greater accessibility in, out of, and around the buildings we use. Heart & Crown Irish Pubs will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.

### Identification of Barriers

- i. Service Counters
- ii. Waiting Area's
- iii. Outdoor Public Use Eating Area's
- iv. Elevated Platforms, Stairs, and Ramps
- v. Lighting Levels
- vi. Off Street Accessible Public Parking

### Planned Action(s)

Heart & Crown Irish Pubs, in conjunction with the Ontario Building Code, will conduct an ongoing review of Regulatory AODA/Barrier-Free Requirements. This will apply to all new construction as well as significant renovations to existing structures.

- i. When constructing or replacing any service counters, Heart & Crown Irish Pubs will ensure that at least one (1) counter is made accessible in accordance with the Integrated Accessibility Standards, section 80.41.
- ii. When constructing or redeveloping an existing waiting area, Heart & Crown Irish Pubs will ensure that a minimum of 3% of the seating is made accessible. Heart & Crown Irish Pubs will ensure that there will be at least one (1) accessible seat.
- iii. Heart & Crown Irish Pubs is committed to ensuring that any newly constructed and/or redeveloped outdoor public use eating areas have a minimum 20% of tables that are made accessible in accordance with the Integrated Accessibility Standards, section 80.17.
- iv. Heart & Crown Irish Pubs will conform with AODA guidelines when constructing or replacing elevated platforms, stairs, and/or ramps.
- v. When constructing or replacing lighting used in public spaces, Heart & Crown Irish Pubs will ensure that all new lighting will conform with AODA guidelines.

## vi. Off Street Accessible Public Parking

### Types of Spaces and Access Aisles

Heart & Crown Irish Pubs owned properties and lease agreements will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities:

- Type A - Parking space with a minimum width of 3.4 m; and
- Type B - Standard parking space with a minimum width of 2.4 m.

Access aisles will be provided for all accessible parking spaces and will meet the requirements of the Integrated Accessibility Standards, section 80.35.

### Minimums

Heart & Crown Irish Pubs will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the Integrated Accessibility Standards, section 80.36.

### Signage

Heart & Crown Irish Pubs will ensure that the proper signage is provided for each accessible parking space. Type A parking spaces will have signage indicating van accessibility.

### Exceptions

There may be times where it is not possible for Heart & Crown Irish Pubs to meet all technical requirements as outlined within legislation. In these instances, Heart & Crown Irish Pubs will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

**Required Legislative Compliance:** January 1, 2017

**Implementation Timeframe:** January 1, 2017 and ongoing

**Completion Date:** January 1, 2017