

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 ADDENDUM TO MULTI-YEAR PLAN - Reviewed Updated - December 1, 2016

COMPLIANCE DATE	INTEGRATED STANDARDS SECTION	COMPLIANT CATEGORY	DESCRIPTION	ACTION TAKEN	COMPLETION DATE
PART 1 - GENERAL REQUIREMENTS					
1-Jan-14	3	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.	Policy document and procedure document created and posted on Cara.com, Brand websites and intranet	1-Jan-14
1-Jan-14	4	Accessibility Plans	4.(1) Large organizations shall, 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; b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years.	Multi Year plan posted on Cara.com, Brand websites and Intranet.	1-Jan-12
				First review for Multi Year Plan	Jan-17
1-Jan-14	6	Self-Service Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self service kiosks.	Reviewed available accessibility features in the existing technology and determined feasibility for accommodations on hand held pay at the table systems and Point of Sale Terminals.	1-Jan-14
1-Jan-15	7.(1)	Training	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, a) all employees, and volunteers; b) all persons who participate in developing the organization's policies; and c) all other persons who provide goods and services or facilities on behalf of the organization. d) board of directors	AODA webinars conducted to educate and update employees on AODA standards.	1-Jul-11
				Training modules created and posted on Intranet for hourly and salaried associates ("Welcoming our Guests with Disabilities")	1-Jul-11
				Support the training , development and execution for performance management, career development and accessibility to employees.	1-Jul-11
				All order agents were trained on the proper use of the Bell Relay system.	1-Jul-11
				AODA training tracked on LMS.	1-Jul-11

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1-Jul-16		Training	Every employee, volunteer, policy developer and any other person who provides goods, services and facilities on behalf of the organization must be trained on how to provide accessible customer service.	Reviewed existing policies and procedures to ensure continued compliance	1-Jul-16

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PART 2 - INFORMATION AND COMMUNICATION STANDARDS					
1-Jan-15	11	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 communications supports, upon request. Any external services for feedback must be made available in additional formats upon request.	<p>Guest feedback can be provided in person, in writing, by e-mail, mail and phone. Associate and Guest materials include this information. Guests can provide feedback for the off-premise channel online through market force, telephone, in person at the restaurant and use the Bell Relay service to assist with placing an order or providing feedback.</p> <p>Guest receipt includes multiple ways to provide feedback.</p>	1-Jun-13
1-Jan-16	12	Accessible Formats and Communication Supports	<p>12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for provision of accessible formats and communication supports for persons with disabilities,</p> <p>b) at a cost that is no more than the regular cost charged to other persons</p> <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>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communications supports.</p>	<p>Cara policy and procedures include the service accommodations regarding Guests who are accommodated by a support persons.</p> <p>Braille and large font menus are available in all restaurants.</p>	1-Sep-13
1-Jan-12	13	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.	All existing plans in place, signage external to Guest.	1-Jan-12
1-Jan-21	14	Accessible Websites & Web Content	All internet websites and web content must conform with WCAG 2.0 Level AA, other than, Success criteria 1.2.4 (Live), Success criteria 1.2.5 Audio descriptions pre recorded.	<p>Call Centre - Identified website requirements and worked with vendor partner to ensure they are conforming to the WCAG standards with all new changes applied post January 2014 towards the Level AA requirements.</p> <p>Cara/Brand Sites - Identified website requirements and worked with vendor partner to ensure they are conforming to the WCAG standards with all new changes applied post January 2014 towards the Level AA requirements.</p>	<p>1-Jan-14</p> <p>1-Jan-14</p>

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PART 3 - EMPLOYMENT STANDARDS					
1-Jan-16	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.	All job postings include accessible accommodations including alternative ways to apply online, by phone, in person.	1-Jan-14
				In-restaurant application templates for hourly associates and franchise partners include language around options to request accommodations.	1-Jan-14
				Implemented that if candidate is successful and moves to the next phase of interviews - we will ask if accommodations are required to accommodate the next phase of the in-person interview.	1-Jan-14
1-Jan-16	23	Recruitment - Assessment or Selection Process	<p>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.</p> <p>(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 applicant's accessibility needs due to disability.</p>	<p>All job postings include our accessible accommodations information including alternative ways to apply online, by phone, in person.</p> <p>All Application Forms include accessible accommodations information.</p>	1-Jan-14
1-Jan-16	24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify successful applicant of its policies for accommodating employees with disabilities.	All offer letters include a clause that indicates where an accommodation is required, prior to their first day of employment, to notify the hiring manager to make the necessary arrangements. They can notify their hiring manager using multiple formats, phone, e-mail, in-person.	1-Jan-14
1-Jan-16	25	Informing Employees of Supports	<p>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 provisions of job accommodations that take into account an employees needs due to a disability.</p> <p>25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p>	<p>Existing policies reflect the language for all new and existing Associates in regards to accommodating disabilities.</p> <p>All pertinent policies are posted on intranet site for all associates.</p>	1-Jan-14

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			25. (3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provisions of job accommodations that take into account an employee's accessibility needs due to disability.		
1-Jan-16	26	Accessible Formats and 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 provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employees job; and</p> <p>(b) information that is generally available to employees in the workplace.</p> <p>26.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support</p>	Procedures on how we will accommodate employees as it relates to communication and training materials required to perform the job.	1-Sep-13
1-Jan-12	27	Workplace Emergency Response Information	<p>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 needs for accommodation due to the employee's disability.</p> <p>(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 repose information to the person designated by the employer to provide assistance to the employee.</p> <p>(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 employees disability.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p>	<p>Created employee emergency response information with questions and authorization for Individual Accommodation Plans. Unique plan will be created based on the questionnaire.</p> <p>Ensured all Managers are aware of the individualized workplace emergency response process as part of our annual code of conduct process.</p> <p>Current policies and procedures were updated to reflect the requirements as outlined in this section of the act.</p>	<p>1-Jan-14</p> <p>1-Jan-14</p>

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			<p>a) when the employee moves to a different location in the organization;</p> <p>b) when the employees overall accommodations needs or plans are reviewed; and</p> <p>c) when the employer reviews its general response policies.</p>		
1-Jan-16	28	Documented Individual Accommodation Plans	<p>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.</p> <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 employees 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 employer's expense, to determine if and how accommodations can be achieved. 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. 5. The steps taken to protect the privacy of the employees. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. In an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 	Document current procedures to reflect the steps and processes to follow when creating an individual accommodation plan for Associates with disabilities as outlined in the section of the act.	1-Jan-16

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			8. The means of providing the individual accommodation plan in a format that takes into account the employees accessibility needs due to disability.		
1-Jan-16	29	Return to Work Process	29. (1) Every employer, other than an employer that is a small organization, 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-related accommodations in order to return to work; and b) shall document the process.	Create a policy and document our processes for Return to Work Plans	1-Jan-16
1-Jan-16	30	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.	Reviewed current process to ensure that Associates with disabilities are measured in a way that accommodates their disability.	1-Jan-14
1-Jan-16	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.	Reviewed current talent review process to ensure that Associates with disabilities are rated and calibrated in a way that accommodates their disability.	1-Jan-14
1-Jan-16	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.	Reviewed current talent review process to ensure that Associates with disabilities are rated and calibrated in a way that accommodates their disability.	1-Jan-14

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PART 4 - CONSTRUCTION/DEVELOPMENT/DESIGN					
1-Jan-17	80.41	Service Counters	There must be a minimum of one part of the service counter that accommodates a mobility aid for each type of service provided	Ongoing review of Regulatory AODA/Barrier-Free Requirements in conjunction with the Ontario Building Code on "new" or existing buildings with "significant renovations"	Jan-17 & Ongoing
1-Jan-17	80.43	Waiting Areas	Where there is fixed seating in a waiting area, a minimum of 3% must be accessible	Ongoing review of Regulatory AODA/Barrier-Free Requirements in conjunction with the Ontario Building Code on "new" or existing buildings with "significant renovations"	Jan-17 & Ongoing
1-Jan-17	80.43	Room Lighting Levels	Ensure dining room lighting levels are per AODA guidelines	Ongoing review of Regulatory AODA/Barrier-Free Requirements in conjunction with the Ontario Building Code on "new" or existing buildings with "significant renovations"	Jan-17 & Ongoing
1-Jan-17	80.43	Stairs, Ramps and Elevated Platforms	Ensure stairs, ramps and elevated platforms conform to AODA guidelines	Ongoing review of Regulatory AODA/Barrier-Free Requirements in conjunction with the Ontario Building Code on "new" or existing buildings with "significant renovations"	Jan-17 & Ongoing