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# Multi-Year Accessibility Plan

2014 to 2018

**THIS DOCUMENT IS AVAILABLE IN ALTERNATE FORMATS UPON REQUEST**

## Our Accessibility Vision

LoyaltyOne, Inc. is the owner and operator of the AIR MILES® Reward Program. The AIR MILES® Reward Program's Vision involves harnessing powerful insights of loyalty to enrich relationships between companies and their customers. *We are committed to include Ontarians of all abilities in realizing our vision.*

## Accessibility Goals

The AIR MILES® Reward Program complies with the *Accessibility for Ontarians Act, 2005* (AODA). We view accessibility as providing our associates, customers and stakeholders with uninhibited access to all our services and information. Our goal is to be a barrier-free organization by identifying, removing and preventing barriers that may limit the involvement of people regardless of ability. Most importantly, the core principles of the Act - independence, dignity, integration, equality of opportunity for people with disabilities - are aligned with inclusion, our strategy to give persons with disabilities opportunity equal to that given to others to obtain, use or benefit from the goods and services provided on behalf of the AIR MILES® Reward Program.

## Our Accessibility Principles

- To support initiatives that removes barriers and promotes or increase equitable access to powerful relationships between companies and their customers enriched by loyalty.
- To promote a healthy, barrier-free work environment where employees can participate fully in all aspects of their job.
- To be a great place to work and celebrate our people by creating a rewarding and meaningful experience that is accessible to all employees, associates, customers, stakeholders and people with disabilities.
- To maintain a comprehensive Accessibility Policy and a Five-year Accessibility Plan.
- To provide, through our ongoing work, a range of accessibility services and support for people with disabilities.
- To ensure that our information and communications to employees, associates, customers and stakeholders are accessible.

## Complying with the Accessibility Standards for Customer Service Regulation

The AIR MILES® Reward Program continues to ensure that in our day-to-day activities, we fulfill all the requirements of this Regulation in keeping with the principles of dignity, independence, equality and integration. For example:

- The AIR MILES® Reward Program ensures that all new staff receive training on the requirements of the Regulation, with particular emphasis on how to serve and communicate with all people
- We welcome requests, inquiries and feedback in person, by mail or email, by telephone and by fax. The public is encouraged to provide feedback using the “Contact Us” area of the AIR MILES® Reward Program website. All feedback is sent to the appropriate party for review and action.

## Complying with the 2012 Requirements of the Accessible Employment Standards Regulation

The AIR MILES® Reward Program meets the requirements of Section 27 of Accessible Employment Standards within the IASR. Under this section, we are required to provide individualized workplace emergency response information to employees who have a disability. If the employee requires assistance in case of an emergency and consented to have information about his or her accommodation needs shared, the AIR MILES® Reward Program will provide the workplace emergency response information to the person designated by the AIR MILES® Reward Program to provide assistance to the employee.

- The AIR MILES® Reward Program employees have been notified of our commitment to work with them to create individual workplace emergency response information. The availability of accommodations is communicated to all employees on a regular basis. Alternate formats are used if required by specific employees. Our respectful process ensures privacy for people who self-identify as needing accommodation.
- Where the need for an individualized workplace emergency response is identified, the designated Chief Fire Warden will confer with the employee to establish a specific emergency plan based on the needs of the individual employee.

## Meeting our Accessibility Commitment Going Forward

### **Introducing the AIR MILES® Reward Program Five-Year Accessibility Plan**

- This Five-year plan was created to comply with Section 4 of the Integrated Accessibility Standards Regulation, which requires large organizations like the AIR MILES® Reward Program to establish, implement, maintain and document a multi-year accessibility plan by January 1, 2014.

- In 2017 there were requirements related to exterior paths of travel; accessible parking; obtaining services, and maintaining accessible parts of our public spaces under the Design of Public Spaces Regulation. We were also required to continue to comply with the Accessible Customer Service Standards.
- Much of our work in 2018 will be to ensure that we maintain our accessibility practices and fine-tune them to align with feedback. When the Accessible Built Environment Standards become law, we will integrate our strategies for any requirements that apply to the AIR MILES® Reward Program into a revised version of our Five-year Accessibility Plan.
- In addition to ensuring we are in compliance with accessibility regulations, our plans for 2018 will build on our growing understanding of how we can be more fully accessible, and where we can play a leadership role in accessibility that may go beyond strict compliance with the regulations.

## Our Detailed Plan: Strategies and Milestones

### 2014

#### A Snapshot of Accessibility in 2014

AIR MILES® Reward Program will ensure that it continued to comply with existing accessibility requirements under both the Accessibility Standards for Customer Service Regulation and the IASR. We also came into compliance with the General Requirements of the IASR to create an accessibility policy for the IASR and our first multi-year accessibility plan. In addition, beginning January 1, 2014 new websites and content on those sites were compliant WCAG 2.0 Level A.

#### Accessibility Standards for Customer Service Regulation

In 2014 and every year of the Plan and beyond, the AIR MILES® Reward Program continued to ensure that it is in compliance with the Accessibility Standards for Customer Service Regulation. More specifically:

- The AIR MILES® Reward Program continued to provide accessible customer service training to every person who deals with members of the public or who participates in developing our policies, practices and procedures governing the provision of goods and services to the public; including all associates, contractors and others who provide service on behalf of The AIR MILES® Reward Program.
- The AIR MILES® Reward Program continued to gather feedback on the goods and services it provides and acts on that feedback to improve services to people with disabilities
- The AIR MILES® Reward Program continued to post appropriate notices regarding service disruptions.
- The AIR MILES® Reward Program continued to ensure that any new policies that are created regarding customer service are consistent with the principles of dignity, independence, integration and equal opportunity.

- The AIR MILES® Reward Program continued to welcome people with disabilities who use assistive devices, to support people or service animals and to train our staff on assistive devices in our facilities.
- The AIR MILES® Reward Program provides prior notice of a fee for a support person where and if it is charged.

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

### **General Requirements**

#### **Accessibility policy**

Section 3 of the Regulation requires large organizations to develop, implement and maintain policies governing how they achieve or will achieve accessibility requirements by January 1, 2014. Section 3 also requires private sector organizations to have a statement of commitment and to use reasonable efforts to make their policies consistent with the principles of dignity, independence, integration and equal opportunity.

#### **Five-year Accessibility Plan**

Section 4 of the IASR requires large organizations to create a multi-year plan by January 1, 2014. We are also required to post a copy of our policies and plans on our website and provide alternate formats upon request.

The AIR MILES® Reward Program met these requirements before the deadline.

- A policy for the Integrated Accessibility Standards Regulation is available on our website and in alternate formats on request.
- Our commitment to accessibility is part of our accessibility policies and this Five-year Accessibility Plan: it includes goals which encompass the principles of dignity, independence, integration and equal opportunity.
- We have completed the Five-year Accessibility Plan before the due date of January 1, 2014.
- This Five-year Accessibility Plan and related policies are posted on our website. Print copies and alternate formats are available on request.

## **Self Service Kiosks**

The AIR MILES® Reward Program will have regard to accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.

## **Information and Communication Standard Accessible Websites and Web Content:**

Beginning January 1, 2014, all new internet websites or websites undergoing a major refresh, and web content on those sites conform to Web Content Accessibility Guidelines or WCAG at the 2.0A level.

- A review of the current and pending websites has been conducted to determine the level of accessibility provided
- Web developers and web content providers have been trained on WCAG in relation to their duties
- Internal expertise is being developed for on-going accessibility for all internet websites and content.

## **2015**

### **A Snapshot of Accessibility in 2015**

2015 is the year that large organizations like the AIR MILES® Reward Program had to ensure that employees and volunteers are trained on the IASR and Human Rights Code. We ensured that our feedback processes are accessible to persons with disabilities and provided in accessible formats and communication supports on request.

## **IASR General Requirements**

The AIR MILES® Reward Program provides training on the accessibility standards referred to in this Regulation and on the Human Rights Code. The training targets every person who deals with members of the public or who participates in developing the AIR MILES® Reward Program's policies, practices and procedures governing the provision of goods and services to the public; including all associates, contractors and others who provide service on our behalf by January 1, 2015.

- The AIR MILES® Reward Program will provide the required training to its employees as appropriate to the duties of that employee.
- The AIR MILES® Reward Program will maintain records of training including the dates and number of trained people.
- New employees and volunteers will receive training on the Accessibility Standards for Customer Service Regulation, on the IASR and on the Human Rights Code during their orientation period.

## **Accessible Information and Communications Standard Feedback:**

Section 11 of these Standards requires, by January 1, 2015, that all our feedback processes be accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports on request. The AIR MILES® Reward Program must also notify the public about the availability of accessible formats and communication supports.

- The AIR MILES® Reward Program accepts feedback through its website and those other means as required
- Alternate formats are available on request for all feedback forms.

## **2016**

### **A Snapshot of Accessibility in 2016**

By January 1, 2016 all of the AIR MILES® Reward Program's Employment practices must be accessible. While many of our existing employment practices already met requirements under the Accessible Employment Standards, we ensured that all our employment practices throughout the employment life cycle met these standards of accessibility. We are also required to provide or arrange for information in accessible formats and communication supports for persons with disabilities on request.

## **Information and Communication Standard Accessible Formats and Communication Supports:**



Section 12 of the IASR requires, by January 1, 2016, that all large organizations provide or arrange for information in accessible formats and communication supports for persons with disabilities on request. The AIR MILES® Reward Program ensures that requested information is:

- Provided in a timely way
- Provided at no extra cost
- Provided following consultation with the person making the request to determine the most appropriate format or support

## **Accessible Employment Standard**

The AIR MILES® Reward Program ensured compliance with the 2012 requirement to provide employees with individualized emergency response plans. New employees with accommodation needs will develop individual emergency accommodation plans with their managers. Revisions will be made to the plans for existing employees if their accommodation needs change.

Other requirements for this standard come into effect for the AIR MILES® Reward Program by January 1, 2016. The AIR MILES® Reward Program will ensure that it has met these requirements by that date and has complied with the intent of this standard to ensure accessibility is incorporated into the entire employment life cycle.

## **Recruitment:**

In compliance with Sections 23 and 24,

- The AIR MILES® Reward Program notifies its employees and the public about the availability of accommodations for applicants with disabilities during the interview process.
- The AIR MILES® Reward Program notifies successful applicants of its policies for accommodating employees with disabilities when offering employment. This notice is included in the letter of offer to the successful applicant.

## **Informing Employees with Disabilities of Supports available to them:**

In compliance with Section 25,

- The AIR MILES® Reward Program informs all employees of its policies for supporting employees with disabilities, including providing employment-related accommodations. Information will be provided through newsletters, staff memos, email and staff meetings.
- New employees receive this information during the on-boarding process
- All employees are given updated information whenever there is a change to existing policies on the provision of job accommodations.
- Employees are assured that their privacy is respected and that any sharing of information about their accommodation needs will be discussed with them and plans for communication made with their consent.

## **Accessible Formats and Communication Supports for Employees:**

In compliance with Section 26,

- The AIR MILES® Reward Program consults with employees who have disabilities to provide them with the accessible formats and communication supports they require to do their job effectively.

## **Individual Accommodation Plans**

- I. In compliance with Section 28, The AIR MILES® Reward Program will develop a written process for the development of Individual Accommodation Plan for employees with disabilities

## **Return to Work**

In compliance with Section 29,

- The AIR MILES® Reward Program has a process for the provision of accommodations where needed when an employee returns to work. (Accommodation Policy-Temporary)
  1. Human Resources evaluates and approves the current return to work process
  2. Modified work or specific accommodations may be provided

3. Talent Development coordinates the appropriate Return to Work training as required.

- The AIR MILES® Reward Program documents this process in compliance with Section 29 of these standards.

## **Performance Management and Career Development**

In compliance with Sections 30 and 31,

- The AIR MILES® Reward Program reviews the accessibility needs of employees with disabilities with regard to: performance management and career development – in ways that take their accessibility needs into account, including performance plans in accessible formats as well as coaching and feedback.

## **2017**

### **A Snapshot of Accessibility in 2017**

2017 marked a jump forward in our accessibility progress. When building new or making major changes to existing public spaces larger organizations like The AIR MILES® Reward Program met applicable requirements under Section 80 of the IASR related to public spaces for obtaining information and maintenance of accessible public spaces. There are no new requirements under the IASR or the Accessible Customer Service Regulation for this year for our organization. The AIR MILES® Reward Program continued to comply with all requirements described earlier in this plan.

### **Design of Public Spaces Standard**

#### **Obtaining Services**

Service Counters: The AIR MILES® Reward Program ensures,

- At least one service counter is accessible to people who use mobility aids.

- Service counters are low enough for someone sitting in a mobility aid.
- Service counters have sufficient clear space for someone sitting in a mobility aid, including space for the person's knees.
- Accessible service counters are identified with accessible signage.

Waiting Areas: The AIR MILES® Reward Program ensures,

- Within waiting areas with seating fixed to the floor at least three percent of seating is accessible to someone using a mobility aid.
- All waiting areas have at least one accessible seating space.

## Maintenance

The AIR MILES® Reward Program ensures,

- Our Multi-year Accessibility Plan includes preventative and emergency maintenance procedures for the accessible parts of our public spaces, including posting of regular maintenance schedules and letting people know about alternatives.
- Procedures for handling temporary disruptions in service when an accessible part of our public spaces stops working are added to the Plan.

## 2018

### A Snapshot of Accessibility Progress in 2018

There are no new requirements for our organization for 2018. Our Five-year Accessibility Plan will expire this year. Therefore we will prepare a new multi-year plan to begin in 2019.

We Welcome Your Feedback

### Contact Us:

- <https://www.airmiles.ca/arrow/ContactUs>