

# **Multi-Year Accessibility Plan (2014-2021)**

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## **Introduction**

This multi-year plan outlines The Sherwin-Williams Company, Sherwin-Williams Canada, Inc., and General Pain Corporation's (collectively, "SWC") strategy to prevent and remove barriers to address the current and future requirements of the IASR, and in order to fulfill SWC's commitment as outlined in our Accessibility Policy.

## **General Requirements**

In accordance with the requirements set out in the IASR, SWC will:

- Develop, implement and maintain policies on how it will achieve accessibility;
- Will ensure that any written policies are available to the public in accessible format, upon request;
- Establish, review and update this plan at least once every five years;
- Post this plan on its website; and
- Provide this plan in an accessible format, upon request.

**Required legislative compliance:** January 1, 2014

**Status:** Complete

**Completion date:** January 1, 2014

## **Training**

### **Commitment:**

SWC will provide training to employees and other staff members on the requirements of the IASR and on the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided in a way that best suits the duties of employees and other staff members.

### **Planned Action:**

In accordance with the IASR, SWC will:

- Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to employees in a way that best suits the duties of the employees;
- Ensure that the training is provided to persons referenced above as soon as practicable;
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided; and
- Ensure that the training is provided on any changes to the prescribed policies on an ongoing basis, as needed.

**Required legislative compliance:** January 1, 2015

**Status:** In progress

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## **Information and Communication Standards**

### **Commitment:**

SWC is committed to meeting the communication needs of persons with disabilities. SWC will consult with people with disabilities to determine their information and communication needs

### **1. Feedback**

#### **Planned Action:**

- In accordance with the IASR, SWC will ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities; and
- Individuals will have the option of providing feedback in person, via email and by telephone.

**Required legislative compliance:** January 1, 2015

**Status:** In progress

**Completion date:** January 1, 2015

### **2. Publicly Available Information**

#### **Planned Action:**

- In accordance with the IASR, SWC will provide or arrange for the provision of accessible formats, upon request in a timely manner; and
- More broadly, 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 communications 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 about the availability of accessible formats and communication supports.

**Required legislative compliance:** January 1, 2016

**Status:** In progress

**Completion date:** January 1, 2016

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## **3. Accessible Emergency Information**

### Commitment:

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

### Action Taken:

The following measures have been implemented by SWC:

- Emergency procedures, plans and public safety information that are prepared by SWC and made available to the public, will be made available in an accessible format, upon request;
- Individualized workplace emergency response information procedures have been developed for employees with disabilities, as required;
- Where required, SWC provides assistance to specific disabled employees, with the disabled employee's prior consent, to help them evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans for the employees;
- These individualized emergency plans have been communicated to the employees' respective managers, on an 'as needed' basis; and
- On an ongoing and regular basis, as per the applicable terms of the IASR, SWC will review and assess general workplace emergency response procedures and individualized emergency plans to ensure accessibility needs continue to be addressed.

**Required legislative compliance:** January 1, 2012

**Status:** Complete

**Completion date:** January 1, 2012

## **4. Accessible Websites and Web Content**

### Planned Action

In accordance with the IASR, SWC will:

- Ensure its internet websites and web content that are controlled within Ontario conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0;
- Advise staff responsible for websites and web content of the requirements of the IASR; and
- Expand corporate awareness of requirements for compliance with Information and Communication Standards of AODA.

**Required legislative compliance:** January 1, 2014 (WCAG 2.0 Level A – new Internet websites and web content), January 1, 2021 (WCAG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR)

**Status:** In progress

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**Completion date:** N/A

## **Employment Standards**

### **Commitment:**

SWC is committed to fair and accessible employment practices.

### **1. Recruitment**

#### **Planned Action**

- In accordance with the IASR, SWC will take the following steps to notify the public and staff that, when requested, SWC will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.
  - A review and, as necessary, modifications of existing recruitment policies, procedures and processes;
  - Specifying that accommodation is available for applicants with disabilities, on the website and on job postings;
  - 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 in the assessment/selection process;
  - If an applicant requests accommodation, consult with the applicant and arrange for suitable accommodations in a manner that takes into account the applicant's individual accessibility needs;
  - Include information about accommodation policies into offers of employment; and
  - Provide new hires with copies of accommodation policies.

**Required legislative compliance:** January 1, 2016

**Status:** In progress

**Completion Date:** N/A

### **2. Individual Accommodation Plans/Return to Work Process**

#### **Commitment**

SWC will incorporate the requirements under the IASR to ensure that SWC has a process for developing individual accommodation plans and return to work policies for employees that have been absent due to a disability.

#### **Planned Action**

SWC's existing policies include steps that SWC will take to accommodate an employee with a disability and to facilitate an employee's return to work after absenteeism due to a disability.

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SWC will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for the employees with a disability, if such plans are required.

SWC will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- 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;
- Include in the process the manner in which SWC, can request an evaluation by an outside medical or expert, at SWC's expense, to assist in determining if and how the accommodation can be achieved;
- Steps are in place 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 this will be done;
- Provide the employee with the reasons for the denial if an 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;
- If Individualized accommodation plans are established, ensure that they include:
  - Individualized workplace emergency response information that is required;
  - Any information regarding accessible formats and communication supports that have been provided for or arranged, in order to provide the employee with:
    - Information that is needed in order to perform the employee's job;
    - Information that is generally available to employees in the workplace
  - Identify any other accommodation that is to be provided to the employee;

**Required legislative compliance:** January 1, 2016

**Status:** In progress

**Completion Date:** N/A

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

#### Commitment

SWC will take into account the accessibility needs and the disabilities of an employee, as well as individual accommodation plans:

- When using its performance management process;

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- When providing career development and advancement; and
- When redeploying employees.

### **Planned Action**

In accordance with the IASR, SWC will:

- Review, assess and, as necessary, modify existing policies, procedures and practices to ensure compliance with the IASR;
- Take into account the accessibility needs of the employees with disabilities and, as applicable, their individualized accommodation plans, when:
  - Assessing performance
  - Managing career development and advancement
  - Redeploying employees.

**Required legislative compliance:** January 1, 2016

**Status:** In Progress

**Completion Date:** N/A

### **Proposed Accessibility Standards for the Design of Public Spaces**

#### **Commitment**

SWC will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. In the event of a service disruption, SWC will notify the public of the service disruption and alternatives available.

#### **Plan of Action**

- Advise staff responsible for public spaces of the requirements of the IASR

**Required legislative compliance:** January 1, 2017

**Status:** In Progress

**Completion Date:** N/A

For more information on this accessibility plan, please contact the SWC Legal Department at 216-566-2436 or Employee Relations at 216-566-2363.