



## Part I- General

SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
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 completed and posted on Elavon.ca external website and internal intranet.	Compliant
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 external website and company intranet.	Compliant
6	Self-Serve 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.	Company takes accessibility into consideration when procuring or acquiring self-service kiosks (Point of Sale Terminals)	Compliant
7	Training	7.(1) 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, services or facilities on behalf of the organization.	Mandatory training program developed with tracking for all employees and completed within first 90 days of employment and annually thereafter.	Compliant





## Part II- Information and Communication Standards

SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
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 communication supports, upon request.	Processes in place to ensure information is provided in accessible formats upon request.	Compliant
12	Accessible Formats & Communication Supports	12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons.	Processes in place to provide or arrange for provision of accessible formats and communication supports in a timely manner and at no cost to the customer	Compliant
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Company consults with the person making the request to determine sustainability of an accessible communication support	Compliant
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Accessible materials available upon request at reception, external website, and company intranet.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
13	Emergency Procedure, Plans or Public Safety Information	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.	<p>Emergency procedures formalized and described in Customer Service Standards Policy on elavon.ca website.</p> <p>Emergency procedures reviewed at new employee orientation.</p> <p>Continue using established company-wide Emergency Notification System.</p> <p>Employees are able to review and update personal information online independently or with assistance.</p>	Compliant
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites 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, and shall do so in accordance with the schedule set out in this section.	Company is committed to providing accessible digital experiences and initiatives are in progress to ensure all websites and web content conforms to WCAG 2.0 AA	In progress





## Part III- Employment Standards

SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
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.	Notification provided in external and internal job postings included in job advertisements/postings.	Compliant
23	Recruitment, Assessment or Selection Process	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. (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.	Language incorporated in all communications to applicants for an interview and job offers.	Compliant
24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Accommodation information is incorporated in the verbal job offer.	Compliant
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Different methods to be used that include new hire information, group emails, general staff meetings e.g. townhall meetings.	Compliant
25		25.(3) Employers shall provide updated information to its employees 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 disability.	Different methods to be used that include new hire information, group emails, general staff meetings e.g. townhall meetings.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
26	Accessible Formats & 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 the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	Individual Accommodation Process (IAP) created.	Compliant
26		<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>	Employees will be consulted in the IAP.	Compliant
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>	Information is incorporated into the current Emergency Response document of information and process, including Individualized Employee Emergency Information Form.	Compliant
27		<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 response information to the person designated by the employer to provide assistance to the employee.</p>	Information is incorporated into the current Emergency Response document of information and process, including Individualized Employee Emergency Information Form.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION
27		(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 employee's disability.	Incorporated into current emergency procedures.
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	Incorporated into current emergency procedures.
28	Documented Individual Accommodation Plans	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.	Written process for accommodation plans developed.





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
28		<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"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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 accommodation can be achieved.</li> <li>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.</li> <li>5. The steps taken to protect the privacy of the employee's personal.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ol>	Written process for accommodation includes all of these elements.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(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 and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	Return to work process handled by Third Party. Process described in Employment Standards Policy and further information available in the Life Event Guide and Short-Term Disability Program Booklet.	Compliant
29		<p>29.(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	Handled by Third Party. Process description includes this information and further information available in the Life Event Guide and Short Term Disability Program Booklet; Process described in Employment Standards Policy. IAP available.	Compliant
29		<p>29.(3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>		Compliant
30	Performance Management	<p>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.</p>	IAP or accessibility needs and individual accommodation plans are considered when managing employee performance.	Compliant







SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
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.	IAP or accessibility needs are considered when managing employee performance.	Compliant
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.	IAP or accessibility needs are considered in any redeployment process.	Compliant

### Part IV.1 – Design of Public Spaces

SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
Part IV.1	Design of Public Spaces	Large organizations are required to comply with the standards on the design of public spaces as set out in Part IV.1 of the Integrated Accessibility Standards Regulation.	Accessibility laws will be complied with when building or making major changes to public spaces.	Compliant





## Part IV.2 – Customer Service Standards

SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.46	Establishment of Accessibility Policies	<p>80.46. (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.</p> <p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <ol style="list-style-type: none"> <li>1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.</li> <li>2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.</li> <li>3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.</li> <li>4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.</li> </ol> <p>(3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so. O. Reg. 165/16, s. 16.</p> <p>(4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.</p>	Policy completed and posted on Elavon.ca internal intranet, and is otherwise available upon request.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.46		(5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.	Customer Service Standards Policy - on external website, intranet, and hard copy at reception.	Compliant
80.47	Use of Service Animals and Support Persons	<p>(2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.</p> <p>(3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.</p> <p>(4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.</p> <p>(5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,</p> <p>(a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and</p> <p>(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.</p>	Incorporated into current practices.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.47		<p>(8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person. O. Reg. 165/16, s. 16.</p> <p>(9) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.</p>	Customer Service Standards Policy - on external website, intranet, and hard copy at reception.	Compliant
80.48	Notice of Temporary Disruptions	<p>80.48. (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p> <p>(3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.</p> <p>(4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request.</p>	<p>Outlined in Customer Service Policy. Notices of any disruption is communicated through automatic messaging when customers call into center.</p> <p>Customer Service Policy available on external website, intranet, and in hard copy at reception.</p>	Compliant



SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.49	Training for Staff	<p>In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> <li>1. Every person who is an employee of, or a volunteer with, the provider.</li> <li>2. Every person who participates in developing the provider's policies.</li> <li>3. Every other person who provides goods, services or facilities on behalf of the provider.</li> </ol> <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> <li>1. How to interact and communicate with persons with various types of disability.</li> <li>2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.</li> <li>3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.</li> <li>4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.</li> </ol>	<p>Online mandatory training program developed with tracking for all employees and completed within first 90 days of employment and annually thereafter. Individuals also trained on ongoing basis regarding changes to policies.</p>	Compliant
80.49		<p>(5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Records kept as required.</p>	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.49		(5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	Records kept as required.	Compliant
80.49		<p>(6) Every provider, other than a small organization, shall,</p> <p>(a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and</p> <p>(b) on request, give a copy of the document to any person.</p> <p>(7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request.</p>	This information is included in the Customer Service Policy that is available on external website, intranet, and in hard copy at reception.	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.5	Feedback	<p>80.50. (1) Every provider shall establish a process for receiving and responding to,</p> <p>(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and</p> <p>(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).</p> <p>(2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.</p> <p>(3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.</p> <p>(4) Every provider shall make information about the feedback process readily available to the public.</p> <p>(5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person.</p> <p>(6) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (5) is available on request.</p>	<p>Information available in Customer Service Policy. Includes website, phone number, and dedicated accessibility email address. Policy available on external website, intranet, and hard copy at reception.</p>	Compliant





SECTION	INITIATIVE	ACT SECTION AND DESCRIPTION	ACTION	STATUS
80.51	Format of Documents	<p>80.51. (1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons.</p> <p>(2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	Incorporated into current practices.	Compliant

