

# **ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005**

## **INTEGRATED ACCESSIBILITY STANDARDS- Multi Year Plan**



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#### Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
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.	<p>(a) Draft the policy and give to COO for approval.</p> <p>(b) Post on website</p>	<p>(a) Complete; policy approved</p> <p>(b) Complete; policy posted on website</p>	January 1, 2014 (in compliance)
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>(a) Attended a public workshop and started working on draft.</p> <p>(b) Have IT post the plan on the website.</p> <p>(c) Policy to be reviewed at least every 5 years, review date to be noted on the policy.</p>	<p>(a) Complete; HR Manager attended a workshop in 2013.</p> <p>(b) Complete; current revision of plan posted to the website.</p> <p>(c) Complete; policy to be reviewed every five years.</p>	January 1, 2014 (in compliance)

7	Training	<p>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,</p> <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization's policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Determine the method of training and the number of training levels (managers, employees) Classroom, elearning or blending?</li> </ul>	(a) ongoing	January 1, 2015
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**PART II – Information and Communications Standards**

Section	Initiative	Description	Action	Status	Compliance Date
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.	<ul style="list-style-type: none"> <li>(a) Conduct a review of all feedback processes across the organization (internally and externally) for all departments.</li> <li>(b) Determine what accessible formats and communication supports we will provide upon request.</li> <li>(c) Ensure staff and management are aware of the need to accommodate upon request (possibly part of the training)</li> </ul>	ongoing	January 1, 2015
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, <ul style="list-style-type: none"> <li>a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</li> <li>b) at a cost that is no more than the regular cost charged to other persons.</li> </ul>	<ul style="list-style-type: none"> <li>(a) Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</li> <li>(b) Ensure these formats and supports can be provided in a timely manner (ex. Same time, 24 hours)</li> <li>(c) Communicate that no additional charge is required.</li> </ul>	ongoing	January 1, 2016

12	Cont'd	12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	(a) Train applicable employees on the need to consult the requestor for expectations of suitable accommodation.  (b) Determine protocol for situations where a suitable agreement cannot be made.	ongoing	January 1, 2016
12	Cont'd	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	(a) Consider documentation at reception.  (b) Post on website.	Ongoing	January 1, 2016
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.	(a) Update Emergency Procedure to document that accessible formats are available.	(a) complete	January 1, 2012
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	(a) Communicate standard with website design contact	(a) Complete	<b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A.

		with the schedule set out in this section.	(b) HR Manager to remain in contact with website contact to continuously review WCAG guidelines to be informed of changes and updates	(b) Ongoing	<p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>
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**PART III – Employment Standard**

Section	Initiative	Description	Action	Status	Compliance Date
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.	<p>(a) Include a statement in the job ad. “We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs.”</p> <p>(b) Review where we advertise jobs to eliminate barriers.</p>	ongoing	January 1, 2016
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</p>	<p>(a) Designate a contact person to handle queries regarding accessibility.</p> <p>(b) Identify barriers: location of interview rooms, format of tests, room set-up, interviewing timelines, supports, paperwork.</p>	<p>Ongoing</p> <p>(a) Complete; HR Manager will be designated contact within the policy.</p>	January 1, 2016

		accommodation in a manner that takes into account the applicant's accessibility needs due to disability.	(c) Offer support during pre-screen and other times throughout the process.		
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.	(a) Include a statement in an employment offer. (notification to successful applicants)	Ongoing	January 1, 2016
25	Informing Employees of Supports	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 provision of job accommodations that take into account an employee's accessibility needs due to disability.	(a) Annual training of the AODA policy to all employees.	Ongoing	January 1, 2016
25	Cont'd	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	(a) Include the AODA policy in the orientation package.	(a) Complete	January 1, 2016
25	Cont'd	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.	(a) Retraining to be provided if significant change made to the policy. Annual training is conducted for all employees.	Ongoing	January 1, 2016
26	Accessible Formats &	26.1 In addition to its obligations under section 12, where an employee with a	(a) When a request is made, the Company shall		



	Communication Supports for Employees	<p>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>	<p>undergo an internal functional audit of information specific to the position. (eg. Emails, Paperwork, verbally, software).</p> <p>(b) When a request is made, the Company shall undergo an internal audit of regular communications in all departments to ensure that general information is available in the required format.</p>	Ongoing	January 1, 2016
26	Cont'd	<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>	<p>(a) When a request is made, the Company shall list what the employee requires regarding accessible format or communication supports that are needed (text to speech, large print, accessible pdfs, plain language versions) and verify with the employee that the accommodation is suitable.</p>	Ongoing	January 1, 2016

27	Workplace Emergency Response Information	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 need for accommodation due to the employee's disability.	(a) Document procedure to assist employees that have identified a need for assistance due to disability. .	(a) Complete; this has been captured in our Emergency Response Plan.	January 1, 2012 (in compliance)
27		(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.	(a) Document that accommodation information will be shared with those designated to provide assistance upon the employee's consent.	(a) Complete; this has been captured in our Emergency Response Plan.	January 1, 2012 (in compliance)
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.	(a) Incorporate into orientation of new hires.	(a) Complete; Emergency Response Plan included in Orientation Package.	January 1, 2012 (in compliance)
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	(a) Document that the workplace emergency plan will be reviewed if the employee moves to a different location in the organization.	(a) Complete; captured in Emergency Response Plan.	January 1, 2012 (in compliance)

		accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.			
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.	(a) Develop process to document individual accommodation plans.	Ongoing	January 1, 2016
28	Cont'd	28 (2) The process for the development of documented individual accommodation plans shall include the following elements:  1. The manner in which an employee 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 accommodation 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	(a) Develop process to document individual accommodation plans.	Ongoing	January 1, 2016

		<p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
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>	(a) Review the current policy and process to ensure it meets the requirements.	Ongoing	January 1, 2016

		(b) shall document the process.			
29	Cont'd	29. (2) The return to work process shall,  (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  (b) use individual documented accommodation plans, as described in section 28, as part of the process.	(a) Review the current policy and process to ensure it meets the requirements.	Ongoing	January 1, 2016
29		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.	(a) Review the current policy and process to ensure it meets the requirements.	Ongoing	January 1, 2016
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.	(a) Review current process. Need to keep individual accommodation plan in mind.	Ongoing	January 1, 2016
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	(a) Review your current process. Need to keep individual accommodation plan in mind.	Ongoing	January 1, 2016

		accommodation plans, when providing career development and advancement to its employees with disabilities.			
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.	(a) Review of current process. Need to keep individual accommodation plan in mind.	Ongoing	January 1, 2016