

# ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

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

## Part I – GENERAL REQUIREMENTS

| Section | Initiative                                    | Description  | Action   | Status   | Compliance Date |
|---------|---|--|--|--|-----------------|
| 3       | Establishment<br>of Accessibility<br>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   | Policy<br>Approved<br>Dec 10/13                                  | January 1, 2014 |
| 4       | Accessibility<br>Plans                        | <ul> <li>4.(1) Large organizations shall,</li> <li>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;</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul> | HR Attended workshop Potential barriers identified Plan completed  Added Accessibility Icon on home page  HR will review annually to meet reporting requirements | Plan<br>Approved<br>Dec 10/13<br>Website<br>Revised<br>Dec 31/13 | January 1, 2014 |
| 6       | Self-Serve<br>Kiosks                          | 6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities   | N/A  |  | January 1, 2014 |

|   |          | when designing, procuring or acquiring self-<br>service kiosks.   |   |                 |
|---|----------|---|---|-----------------|
| 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. | Identify training program (check proLearning modules)  Determine how many programs are needed (mgmt. employees, etc.)  Determine who will deliver and how (e-learning, in house, etc.)  Determine when training will be delivered | January 1, 2015 |

## **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.  | Conduct review of all feedback processes (employee surveys, customer surveys - internally and externally).  Consult with all departments.  Determine what accessible formats and communication options (verbal/written) will be available.  Make sure staff and management are aware that this needs to be available upon request (part of training program). |        | 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, 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. | Determine what accessible formats and communication options (verbal/written) will be available.  Determine how long it will take to provide these formats (within 24 hours would be timely).  Ensure staff know there will be no costs associated. (or charge reasonable costs to outsiders)  |        | January 1, 2016 |
| 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.  | Ensure staff know how to offer/determine options (larger font, different colours, read it out loud, etc.)   |        | January 1, 2016 |

| 12 |   | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.  | Post on website and reception and possibly print material (invoices, etc.)                            | January 1, 2016  |
|----|---|---|---|--|
| 14 | Accessible<br>Websites &<br>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. | Purchased proLearning guide and gave it to IT for review.  IT/HR reviewed – sent to Agora for review. | January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded). |

## PART III – Employment Standard

| Section | Initiative  | Description  | Action   | Status | Compliance Date |
|---------|---|--|--|--------|-----------------|
| 22      | Recruitment –<br>General                              | 22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.  | Include statement in job ads that we will meet this requirement (internal and external). Eg. We are committed to providing accommodations for persons with disabilities. If you require accommodation we will work with you to meet your needs.  Recruit in a variety of formats (electronic, resume's mailed in, etc.)                                |        | January 1, 2016 |
| 23      | Recruitment,<br>Assessment or<br>Selection<br>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. | How will we notify applicants? Phone, writing, (remind them we have accommodation support).  Include interview guidelines into training program for hiring managers.  Are interview rooms accommodating?  Do timelines take into account flexibility needs?  If phone screening, set up time to do so – not right when you call – so they can prepare. |        | January 1, 2016 |
| 24      | Notice to<br>Successful<br>Applicants                 | 24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.   | Add statement of such to offer letter.   |        | January 1, 2016 |

| 25 | Informing<br>Employees of<br>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.   | Circulate the policy.  Create training program.  Conduct training.   | January 1, 2016 |
|----|---|--|--|-----------------|
| 25 |   | 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.  | Include in orientation.  | January 1, 2016 |
| 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.  | See above.   | January 1, 2016 |
| 26 | Accessible Formats & Communication Supports for Employees | 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,  (a) information that is needed in order to perform the employee's job; and  (b) information that is generally available to employees in the workplace. | Determine what information is required for them to do jobs (SOPs, job descriptions, work instructions, policies, SDSs, etc.) – what formats are they available in?  What other information is provided – what formats are they available in. | January 1, 2016 |

| 26 |   | 26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.   | Train staff to have this conversation – courteous, helpful, professional, non-judgemental.  Make sure they know what is available.          |          | January 1, 2016 |
|----|---|--|---|----------|-----------------|
| 27 | Workplace<br>Emergency<br>Response<br>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. | Send reminder email or other communication to staff that if they need accommodation during workplace emergencies, they need to let us know. | Complete | January 1, 2012 |
| 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. | Advise buddy.   | Complete | January 1, 2012 |
| 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.  | Be timely (within 24 hours).  | Complete | January 1, 2012 |

| 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.   | Ensure plan is communicated to new manager.  Review as changes occur.               | Complete | January 1, 2012 |
|----|--|---|---|----------|-----------------|
| 28 | Documented<br>Individual<br>Accommodation<br>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.  | Integrate into ESTRW process to these guidelines are met.  Forms may need revision. |          | January 1, 2016 |
| 28 |  | <ul> <li>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</li> <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> </ul> | Integrate "The Accommodation Process" example into ESRTW process.                   |          | January 1, 2016 |

|    |                           | <ul> <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.</li> </ul> |  |                 |
|----|---------------------------|--|--|-----------------|
|    |                           | <ul> <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> </ul>                         |  |                 |
| 29 | Return to Work<br>Process | <ul> <li>29.(1) Every employer, other than an employer that is a small organization,</li> <li>(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</li> <li>(b) shall document the process.</li> </ul>  | Integrate Sample RTW into ESRTW program. | January 1, 2016 |

| 29 |  | <ul> <li>29. (2) The return to work process shall,</li> <li>(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</li> <li>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</li> </ul> | See above  |          | 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.   | Ensure WSIA is not compromised.  |          | January 1, 2016 |
| 30 | Performance<br>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.  | Our annual performance management process is assessable, both in written and oral formats as requested.  For those employees with individual accommodation plan, assessable formats are available when communicating performance expectations (coaching, warnings, etc.) | Complete | January 1, 2016 |
| 31 | Career<br>Development &<br>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.   | Same as 30   |          | January 1, 2016 |

| 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. | Same as 30 |  | January 1, 2016 |  |
|----|--------------|--|------------|--|-----------------|--|
|----|--------------|--|------------|--|-----------------|--|

## **PART IV.1 – Built Environment**

| Section | Initiative  | Description  | Action   | Status | Compliance Date |
|---------|---|--|--|--------|-----------------|
| 80      | Meet the Accessibility Standards for the Design of Public Spaces when building or making modifications to public spaces | Public spaces applicable to our organization include:  a) outdoor paths of travel such as sidewalks, ramps, stairs, curb ramps, off-street parking  b) service related elements such as reception, waiting areas | Create policy that states newly constructed or redeveloped public spaces will meet the AODA Built Environment requirements.  Ensure staff responsible for this understands and follows requirements. |        | January 1, 2017 |