

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

2021-2025

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Part I – GENERAL REQUIREMENTS

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 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 is Completed, ready for Senior Management Approval | Completed | January 1, 2015 |
| 4 | Accessibility Plans | 4.(1) Large organizations shall, | Hire professional consultant, working on draft | Completed | January 1, 2015 |
| | | 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; | | Completed | |
| | | 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. | a) HR will update | Completed | December 5, 2020 |

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| 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> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization’s policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p> | <p>a) Unionized and Managers / Supervisors training completed November 1, 2014</p> <p>b) Senior Management Webinar November 19, 2014</p> <p>c) N/A</p> | Completed | January 1, 2015 |
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PART II – Information and Communications Standards

| Section | Initiative | Description | Action | Status | Compliance Date |
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| 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. | Provided as requested. | 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, 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. | (1) Determine what assessable formats and communications supports we will provide to people with disabilities upon request. (a) Ensure formats and supports can be provided in a timely manner (within one to two weeks). (b) Communicate to staff that no additional charges are required. | Ongoing/as required | 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 that senior HR Staff are aware of this standard and will communicate to relevant employees. Develop a protocol for situations where a suitable agreement cannot be reached. | Ongoing | January 1, 2016 |
| 12 | | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Communications posted on: a) website; b) signs posted in reception; c) sales or marketing literature. | a)Completed b)Completed c)Ongoing | January 1, 2016 |

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| 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. | Accessible formats and appropriate communication supports will be provided as soon as practicable upon request. | Health and Safety | January 1, 2015 |
| 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. 15 – 21 items not relevant to our industry | Refer to IT, Continuously review WCAG guidelines to be informed of changes and updates. | In progress | January 1 2021 All internet sites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none"> • 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 |
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| 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. | We are committed to providing accommodations for individuals with disabilities. If you require accommodations we will work with you to meet your requirements. | Ongoing | January 1, 2016 |
| 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. | (1) Questions concerning Accessibility referred to Human Resources. Requests received in English or French. (2) Identify barriers. Develop interview guideline. | (1)Ongoing (2)implement accommodations as necessary | January 1, 2016 |
| 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. | Statement will be put in offer letter. Part of Onboarding communication | Completed | January 1, 2016 |

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| 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. | Will be added to website. Onboarding documentation. Will be rolled out to all existing employees through training annually. | Included on internal website Included as part of onboarding Ongoing | 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. | Included in onboarding documentation. | Ongoing | 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. | Changes in policies are rolled out through annual training Made available on internal website. | Ongoing Ongoing | 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. | (a) Will be provided upon request, complete functional audit of information relevant to specific departments (b) Audit of regular communications | Ongoing | 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. | List various accommodation options, physical, information and Communications | Ongoing | January 1, 2016 |

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| 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. | In practice | Ongoing | 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. | In place as required or requested | Ongoing | 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. | In place as required or requested | Ongoing | 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. | Will respond as needed | Ongoing | January 1, 2012 |

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| 28 | Documented Individual Accommodation Plans | 28.(1) Employers, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. | Process needs to be developed, will be implemented on an individual basis by Human Resources | Process in place | January 1, 2016 |
| 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"> 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 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>(1) Approach Human Resources for plan implementation</p> <p>(2) By medical professional</p> <p>(3) Make contact with outside source to obtain an independent evaluation.</p> <p>(4) When meeting is requested Human Resources or Supervisor will arrange attendance of Union Representative. Employees not represented by a bargaining agent may bring a co-worker of their choice to the meeting.</p> | Process in place | January 1, 2016 |

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| | | <p>5. The steps taken to protect the privacy of the employee’s personal information.</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> | <p>(5) Human Resources ensures that only appropriate information is disclosed on documentation.</p> <p>(6) Annually or as needed with the appropriate medical evidence.</p> <p>(7) Reasons for denial would be provided to the employee In person and documented.</p> <p>(8) Human Resources would access appropriate accommodation.</p> | | |
| 29 | Return to Work Process | <p>29.(1) Every employer,</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> | <p>(a) Return to Work process is in place and utilized as appropriate</p> <p>(b) Documentation completed by Human Resources</p> | <p>Completed</p> <p>Completed</p> | <p>January 1, 2016</p> |

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| 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> | <p>(a) Employee takes required document to required medical professional then returns to Human Resources for further determination on return to work</p> <p>(b) Functional Abilities Form, Job Task Analysis and/or Individual Documented Accommodation Plan</p> | <p>Process in place</p> <p>Process in place</p> | <p>January 1, 2016</p> |
| 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> | <p>Relevant legal statutes will be referenced during any return to work process</p> | <p>ongoing</p> | <p>January 1, 2016</p> |
| 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> | <p>Review current processes and ensure that accommodation plans are utilized when employees with disabilities receive evaluations.</p> | <p>Ongoing</p> | <p>January 1, 2016</p> |
| 31 | Career Development & Advancement | <p>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.</p> | <p>Review current process, will keep individual accommodation plans in mind when developing career advancement.</p> | <p>Ongoing</p> | <p>January 1, 2016</p> |

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| 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. | Will review current redeployment process and retain individual accommodation plans. | Ongoing | January 1, 2016 |
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