

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 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.	<ul style="list-style-type: none"> ✓ Policy prepared to enable compliance with integrated accessibility standards under AODA. ✓ Policy last reviewed – November 2019. 	Ongoing/ Completed	December 1, 2014
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 organizations 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>	<ul style="list-style-type: none"> ✓ Post accessibility plan on website. ✓ Provide policy and accessibility plan in an accessible format, upon request. ✓ Identify and address barriers, in consultation and partnership with different departments. ✓ HR to review policy and accessibility plan with management at least once every 5 years – last review November 2019. 	Ongoing /Completed.	December 1, 2014

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; (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.</p>	<ul style="list-style-type: none"> ✓ Determine and ensure that appropriate training on the requirements of the IAS and on the Ontario Human Rights Code is provided to all referenced persons, as soon as practicable – as new hires join the AODA compliance training is completed as part of the onboarding activities. ✓ 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. ✓ Ensure training is updated on an ongoing basis – last updated Sept 2019 	Ongoing/ Completed	January 1, 2015
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PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>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.</p>	<ul style="list-style-type: none"> ✓ Conduct a review of feedback processes across the organization. ✓ Determine accountability for managing internal and external inquiries. 	Completed	January 1, 2015

12	Accessible Formats & Communication Supports	<p>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:</p> <p>a) in a timely manner that considers the persons 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>	<ul style="list-style-type: none"> ✓ Determine accessible formats and communication supports will be provided upon request. ✓ Ensure formats and supports can be provided in a timely manner at a cost that is no more than standard costs. 	Completed	January 1, 2016
12	Accessible Formats & Communication Supports	<p>12 (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> ✓ Determine the most appropriate accessible format or communication support to be provided upon request. ✓ Review requests made, and accommodation provided. 	Completed	January 1, 2016
12	Accessible Formats & Communication Supports	<p>12 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Notifications to be posted:</p> <ul style="list-style-type: none"> ✓ In visible area in all locations. ✓ Print material if appropriate. 	Completed	January 1, 2016

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.	<ul style="list-style-type: none"> ✓ Review WCAG requirement with IT, web designer and AODA service center. ✓ Acquire resources to assist with compliance – by Jan 2021 all websites and web content must conform with WCAG 2.0 Level AA. ✓ Review & update as needed. 	Completed	January 1, 2021
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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.	<ul style="list-style-type: none"> ✓ Talent Acquisition to review and modify existing recruitment policies, procedures, and processes. ✓ All job postings to advise on commitment to providing accommodation for persons with disabilities. 	Completed	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 accommodation in a manner that considers the applicant 's accessibility needs due to disability.</p>	<ul style="list-style-type: none"> ✓ Revise recruitment guides, processes, and scripts to ensure candidates are advised of access to accommodation throughout the job selection process. ✓ Coordinate with external vendors to ensure communications are updated to meet this requirement. ✓ Identify and address current barriers – location of meeting rooms, format of tests/systems, room set up for in person interviews, etc. 	Completed	January 1, 2016
24	Notice to Successful Applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> ✓ Review and update letter of offer as required. ✓ Review and update general orientation. 	Completed	January 1, 2016
25	Informing Employees of Supports	<p>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 consider an employee 's accessibility needs due to disability.</p>	<ul style="list-style-type: none"> ✓ Policy Circulated ✓ Ensure employees are informed of changes to the accommodation process as they occur via email and/or group information sessions 	Completed/ Ongoing	January 1, 2016

25	Informing Employees of Supports	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	✓ Include AODA briefing in new employee orientation	Completed	January 1, 2016
25	Informing Employees of Supports	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 consider an employee's accessibility needs due to disability.	✓ As they occur, changes will be communicated via email and/or individual/group information sessions.	Completed /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 to perform the employee's job; and (b) information that is generally available to employees in the workplace.	✓ Upon receiving a request, the HR Representative will work with the employee and any individual responsible for providing the information to deliver a suitable accessible format or communication support.	As required	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	✓ Upon receiving a request, the HR Representative will work with the employee and any individual responsible for providing the information to deliver a suitable accessible format or communication support.	As required	January 1, 2016

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 need for accommodation due to the employee's disability.</p> <p>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.</p> <p>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.</p> <p>27(4) Every employer shall review the individualized workplace emergency response information:</p> <ul style="list-style-type: none"> (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. 	<p>✓ The Company will provide all existing public emergency procedures, plans and public safety information, upon request, in an accessible format or with appropriate communications supports in a timely manner.</p>	As required	January 1, 2012
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28	Documented Individual Accommodation Plans	<p>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.</p> <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. 5. The steps taken to protect the privacy of the employee 's personal. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that considers the employee 's accessibility needs due to disability. 	<p>✓ Assess IASR requirements and on a case by case basis, develop an accommodation plan and a return to work plan that addresses all applicable requirements to facilitate a successful accommodation and return to work.</p>	As required	January 1, 2016
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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> <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>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>✓ Assess IASR requirements and on a case by case basis, develop an accommodation plan and a return to work plan that addresses all applicable requirements to facilitate a successful accommodation and return to work.</p>	As required	January 1, 2016
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>✓ Performance management will consider accessibility needs and individual accommodation plans accordingly.</p>	As required	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 accommodation plans, when providing career development and advancement to its employees with disabilities.	✓ Career development and advancement will consider accessibility needs and individual accommodation plans accordingly.	As required	January 1, 2016
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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.	✓ As required, the Company will incorporate the accessibility needs and accommodation plans of any employee that is being redeployed to an alternate position and/or department.	As required	January 1, 2016
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