

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan - ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

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. | Attended Policy & Multi-year Plan Workshop on March 26, 2013. Policy created, sent for approval and posted. | Complete | January 1, 2014 |
| 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. | Attended Policy & Multi-year Plan Workshop on March 26, 2013. Created Multi-year Plan and posted on company website. Plan will be reviewed on an on-going basis. | Complete | January 1, 2014 |

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| 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. | Currently assessing various training options for implementation in Fiscal Year 14 (prior to compliance deadline). Need to determine type of training and number of levels to be rolled out. | In Progress | 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. | Identify & assess how feedback is currently solicited from employees. Determine which alternative formats are available. | In Progress | 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. | Identify and assess accessible formats currently available, and determine which methods to adopt going forward. Escalation path currently in place: employee should contact their supervisor or the HR Business Partner should they require accommodation, accessible formats, or communication supports. | In Progress | January 1, 2016 |

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| 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. | <p>Communicate to staff and management that accessible formats are available. Training program will address how to deal with these types of requests.</p> <p>Develop a protocol for situations when solutions to requests cannot be made.</p> | | January 1, 2016 |
| 12 | | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | Determine best method of notification of availability of accessible formats. | | 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. | <p>Contact Communications department re: website accessibility; send copy of WCAG guidelines</p> <p>Review what changes need to be made to site to ensure compliance with this requirement.</p> <p>Web designer made aware of requirements when site changed in November, 2013.</p> | In Progress | <p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre- |

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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. | Determine how to notify employees and the public. | In Progress | 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. | Identify current barriers that may exist in recruitment process. Develop guidelines for recruiters and managers for accommodation. Determine how to notify job applicants of accommodations available. | In Progress | 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. | Discuss options with Recruitment & HR. | In Progress | January 1, 2016 |
| 25 | Informing Employees of | 25.(1) Every employer shall inform its employees of its policies used to support its | Determine how to notify employees of policies (through training). | | |

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| | Supports | <p>employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employees accessibility needs due to disability.</p> <p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>(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.</p> | | | |
| 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> <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>From Section 12 - Communicate to staff and management that accessible formats are available.</p> <p>Training program will address how to deal with these types of requests.</p> <p>Develop a protocol for situations when solutions to requests cannot be found.</p> | In Progress | January 1, 2016 |

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| 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>(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>(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>(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>Corporate Office - outline of individualized plans currently provided to property management company on an annual basis; fire wardens notified to make alternative arrangements.</p> <p>Manufacturing Facility - individualized workplace emergency response information is available for employees who have a disability; regular emergency response training conducted.</p> <p>Outline currently provided to property management company on an annual basis.</p> | Complete | January 1, 2012 |
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| 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. | <p>What is the process? What does it look like? (many versions online)</p> <p>Determine who is going to be involved in this process (management, just HR?)</p> <p>Maintain confidentiality, privacy of the person</p> | In Progress | 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>Review current return to work/accommodation process and make any necessary alterations.</p> <p>Determine who is going to be involved in this process (management, HR, etc.)</p> | In Progress | January 1, 2016 |

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| | | <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> <p>(b) shall document the process.</p> | Review current return to work/accommodation process and make any necessary alterations. | In Progress | January 1, 2016 |

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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>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> | | | 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>Audit current Performance Management process to determine which alternative formats are available.</p> <p>Communicate availability of accommodations through training program.</p> | In Progress | January 1, 2016 |
| 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>Audit current Career Development process to determine which alternative formats are available.</p> <p>Communicate availability of accommodations through training program.</p> | In Progress | January 1, 2016 |
| 32 | Redeployment | <p>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.</p> | <p>Audit current Redeployment process to determine which alternative formats are available.</p> <p>Communicate availability of accommodations through training program.</p> | In Progress | January 1, 2016 |