

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

**INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan**

**Approval Date: April 7, 2015**

**Revised Date:**

**Part I – GENERAL REQUIREMENTS**

<b>Section</b>	<b>Initiative</b>	<b>Description</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>	<b>Target Completion Date</b>
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.	1. Draft policy	Policy has been drafted October 22/13. Needs to be sent to sr. management for approval.	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.	1. Develop an accessibility committee to identify barriers to accessibly 2. Executive or Senior to approve multiyear plan 3. Determine how often multiyear plan will be reviewed	Ongoing	January 1, 2014	April 30, 2015

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> <p>(3) Provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p>	<ol style="list-style-type: none"> <li>To determine method of training</li> <li>Require separate one for managers, employees, and third parties (ie: volunteers, foster parents, board members, etc.)</li> <li>Develop customize training programs for each identified group.</li> </ol>	In Progress	January 1, 2015	June 1, 2015
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**PART II – Information and Communications Standards**

Section	Initiative	Description	Action	Status	Compliance Date	Target Completion Date
9	Definitions and Exceptions	<p>9. (3) If an obligated organization determines that information or communications are unconvertible, the organization shall provide the person requesting the information or communication with;</p> <p>(a) an explanation as to why the information or communications are unconvertible; and  (b) a summary of the unconvertible information or communication.</p>	<ol style="list-style-type: none"> <li>Include this requirement in the training</li> </ol>	In Progress	Jan 1, 2016	
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>	<ol style="list-style-type: none"> <li>Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured.</li> <li>Determine what accessible formats and communication supports we will provide upon request.</li> </ol>	In Progress	January 1, 2015	<p>Feedback process for commenting on accessibilities matters has been developed – <b>completed.</b></p> <p>June 1, 2015 – updating other feedback processes</p>

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.	<ol style="list-style-type: none"> <li>1. Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</li> <li>2. Ensure these formats and supports can be provided in a timely manner (ex. Same time, 24 hours).</li> <li>3. Communicate to staff and management that no additional charge is required (how we will do this is to be determined – ie: include in training).</li> </ol>	Ongoing	January 1, 2016	
		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ol style="list-style-type: none"> <li>1. Include this requirement in the training</li> </ol>	Ongoing	January 1, 2016	
		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ol style="list-style-type: none"> <li>1. Have a sign posted in reception.</li> <li>2. Post on website (IT)</li> <li>3. Include notice on certain print materials (to confirm with Communications). i.e. We have accessibility formats available upon request (leave sign up)</li> <li>4. Add a statement to our e-mail signatures.</li> </ol>	Ongoing	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.	<ol style="list-style-type: none"> <li>1. Pro-Learning booklet is available for IT.</li> <li>2. IT has been informed that any new websites or web content on has to conform with WCAG 2.0 Level A.</li> <li>3. IT to update website and web content to conform to WCAG 2.0 Level AA by Jan. 1, 2021 <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> </li> </ol>	Ongoing / In Progress	<b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A. <b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,	
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**PART III – Employment Standard**

Section	Initiative	Description	Action	Status	Compliance Date	Target Completion 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.	<ol style="list-style-type: none"> <li>1. Determine “how”. Include a statement in a job ad? Identify where you advertise – paper, website, bulletin board? Example: We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs”. Example from the City of Windsor provided to Lori Jeffery</li> <li>2. Draft a Recruitment Policy to cover all the requirements in this section.</li> </ol>	In Progress	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 takes into account the applicant's accessibility needs due to disability.</p>	<ol style="list-style-type: none"> <li>1. Add a section to the phone screening – accommodations available upon request.</li> <li>2. Identify potential barriers: location of interview room, format of tests, room set-up for in person interviews, interviewing timelines, supports, paperwork</li> <li>3. Develop interview guidelines</li> </ol>	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.	<ol style="list-style-type: none"> <li>1. Include a statement in the offer letters.</li> </ol>	In Progress	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.	<ol style="list-style-type: none"> <li>1. Policy to be distributed to staff yearly via PolicyTech.</li> <li>2. Copy of the policy to be posted on the HR board at the employee entrance at both the Windsor and Leamington office</li> </ol>	In Progress	January 1, 2016	
		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ol style="list-style-type: none"> <li>1. Include accommodation process in the new employee orientation presentation.</li> <li>2. Employees will review policy via policy tech within the first month of employment.</li> </ol>	In Progress	January 1, 2016	
		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 25 (1)	In Progress	January 1, 2016	

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>	1. Develop a process on how you will do this.	In Progress	January 1, 2016	
		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	1. Include this in the process from 26.1	In Progress	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.	1. Included in the Emergency Response Plan	<b>Completed</b>	January 1, 2012	<b>Completed</b>
		(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.	1. Included in the Emergency Response Plan	<b>Completed</b>	January 1, 2012	<b>Completed</b>
		(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.	1. Included in the Emergency Response Plan	<b>Completed</b>	January 1, 2012	<b>Completed</b>

		<p>(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul>	<ul style="list-style-type: none"> <li>1. Included in the Emergency Response Plan</li> <li>2. Will add this requirement to the training required under section 7 as a refresher</li> </ul>	<b>Completed</b>	January 1, 2012	<b>Completed</b>
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.	<ul style="list-style-type: none"> <li>1. Return to Work and Accommodation Policy drafted</li> <li>2. Return to Work and Accommodation language in the collective agreement</li> </ul>	In Progress	January 1, 2016	
		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> <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> <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</li> </ul>	<ul style="list-style-type: none"> <li>1. Number 1 thru 6 have been included in the draft Return to Work and Accommodation Policy</li> <li>2. Need to add 7 &amp; 8 to the policy</li> </ul>	In Progress	January 1, 2016	

28 cont'd		<p>plan.</p> <ol style="list-style-type: none"> <li>5. The steps taken to protect the privacy of the employee's personal.</li> <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> </ol>				
		<p>28 (3) Individual accommodation plans shall,</p> <ol style="list-style-type: none"> <li>a. If requested, include any information regarding accessible formats and communication supports provided, as described in section 26;</li> <li>b. If required, include individualized workplace emergency response information as described in section 27; and</li> <li>c. Identify any other accommodation that is to be provided</li> </ol>	<ol style="list-style-type: none"> <li>1. Add to the Return to Work and Accommodations policy.</li> </ol>	In Progress		
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <ol style="list-style-type: none"> <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> </ol>	<ol style="list-style-type: none"> <li>1. Return to Work Policy drafted. Policy needs to be finalized and communicated to staff via Policy Tech</li> </ol>	In Progress	January 1, 2016	

		<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>1. Return to Work Policy drafted. Policy needs to be finalized and communicated to staff via Policy Tech</p>	In Progress	January 1, 2016	
		<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>		In Progress	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>1. Train Management on this requirement.</p> <p>2. Add a note to the current performance evaluations reminding management to keep this in mind when completing the evaluations.</p> <p>3. Add a section to the Return to Work and Accommodation policy</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>1. Add to the Recruitment Policy</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>1. Add to the Recruitment Policy</p>	In Progress	January 1, 2016	