

ANDREW PELLER

— LIMITED —

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.	Developed Customer Service Policy	Complete	January 1, 2012
			Developed IAS Policy	Complete	January 1, 2014
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <ul style="list-style-type: none"> 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; post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and review and update the accessibility plan at least once every five years. 	Developed IAS multi-year plan	Complete	January 1, 2014
			Determine Barrier Assessment strategy	Ongoing	2014
			Posted on Company Website	Complete	January 1, 2014
			Human Resources will review plan in 5 years	Pending	January 1, 2019
7	Training	7.(1) Every obligated organization shall ensure that training is provided on the	All Ontario based employees will receive online training program	Ongoing	January 1, 2014

		<p>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;</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>			
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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>	<p>Accessible feedback processes/formats to be developed</p>	Pending	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 takes into account the person's 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>	<p>Accessible Formats & Communication Supports to be developed</p>	Pending	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.	Consultative processes to be developed	Pending	January 1, 2016		
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Public notification processes to be developed	Pending	January 1, 2016		
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.	Company Emergency Procedures/Plans/Public Safety Info available in accessible formats	Ongoing as requested by Public	January 1, 2012		
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.	IT to monitor new internet websites and web content to ensure compliance.	Ongoing	<table border="1"> <tr> <td>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</td> </tr> <tr> <td>January 1, 2021 All internet websites and web content must conform</td> </tr> </table>	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
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							

					<p>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-recorded).
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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.	Notification to be included in all company job postings	Pending	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</p>	Notification to be included in recruitment/Assessment/Selection Processes	Pending	January 1, 2016
			Consultative processes to be developed	Pending	January 1, 2016

		accommodation in a manner that takes into account the applicant's accessibility needs due to disability.			
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.	Built into all Company Offer of Employment letters	Completed	January 1, 2014
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.	Contained in IAS Policy	Completed	January 1, 2014
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Contained in IAS Policy	Completed	January 1, 2014
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.	Contained in IAS Policy	Completed	January 1, 2014
26	Accessible Formats & Communication Supports for	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	Consultative process to be developed in terms of providing accessible formats and communication supports for all	Pending	January 1, 2016

	Employees	<p>or arrange for the provision of accessible formats and communication supports for,</p> <ul style="list-style-type: none"> • information that is needed in order to perform the employee’s job; and • information that is generally available to employees in the workplace. 	required employment information		
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Consultative process to be developed in terms of determining suitability of accessible formats and communication supports	Pending	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.	Built into all Company Offer of Employment letters	Completed	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.	Built into all Individualized Workplace Emergency Response Plans	Completed	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer	Company process established for development of Individual Emergency Response Plans		

		becomes aware of the need for accommodation due to the employee's disability.			
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.	Contained in IAS Policy	Completed	January 1, 2014
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.	Company process to be developed	Pending	January 1, 2016
28		28 (2) The process for the development of documented individual accommodation plans shall include the following elements: <ul style="list-style-type: none"> • The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. • The means by which the employee is assessed on an individual basis. • The manner in which the employer can request an evaluation by an 	Company process to be developed	Pending	January 1, 2016

		<p>outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</p> <ul style="list-style-type: none"> • 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. • The steps taken to protect the privacy of the employee's personal. • The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. • If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. • The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <ul style="list-style-type: none"> • 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 	Contained in Work Re-Integration Policy	Completed	January 1, 2013

		<p>require disability-related accommodations in order to return to work; and</p> <ul style="list-style-type: none"> • shall document the process. 			
29		<p>29. (2) The return to work process shall,</p> <ul style="list-style-type: none"> • 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 • use individual documented accommodation plans, as described in section 28, as part of the process. 	Contained in Work Re-Integration Policy and Plan	Completed	January 1, 2013
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>	-not an actionable item	N/A	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>	Company process to be developed	Pending	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</p>	Company process to be developed	Pending	January 1, 2016

		accommodation plans, when providing career development and advancement to its employees with disabilities.			
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.	Company process to be developed	Pending	January 1, 2016