

#### 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.	HR to review policy Jan 1, every year	Complete	January 1, 2014
4	Accessibility Plans	<ul> <li>4.(1) Large organizations shall,</li> <li>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;</li> <li>b) post the accessibility plan on website, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years.</li> </ul>	H&S Committee to Identify barriers during monthly inspections complete HR will review Jan 1, every year	Complete	January 1, 2014 November 18, 2014

7Training7.(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.Training has bee sr. mgt.; first line one for all employ learning	e mgrs. and
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#### PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
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.	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. Determine what accessible formats and communication supports we will provide upon request	Complete	January 1, 2015

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			Ensure staff and management are aware of the need to accommodate upon request (included in training)		
12	Accessible Formats & Communication Supports	<ul> <li>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,</li> <li>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</li> <li>b) at a cost that is no more than the regular cost charged to other persons.</li> </ul>	Determine what accessible formats and communication supports we will provide to persons with disabilities upon request. Ensure these formats and supports can be provided in a timely manner (within 24 hours) Communicate to staff and management that no <u>additional</u> charge is required (Included in training) • must be produced within 24 hours of request • ask managers to discuss in team meetings	Ongoing	January 1, 2016

		Advise Reception teams for each location – contact is HR to request accessible formats of documents: Mississauga Port Hope Cambridge Collingwood TIFG Luso Iberia Vieira Trenton Belleville Stirling		
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.	Communicate to staff and management this requirement Develop protocol for situations where a suitable agreement cannot be made	Ongoing	January 1, 2016
12	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Have a sign posted in reception area Post on website	Ongoing	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.	Health & Safety Committee and Fire Wardens have emergency procedures in place	Complete	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.	Sent Marketing department to webinar on Accessible Websites Sourcing vendors and pricing to develop accessible website Continuously review WCAG guidelines to be informed of changes and updates	Complete Complete Ongoing	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 with WCAG 2.0 Level AA, other than, • success criteria 1.2.4 Captions (Live)



		<ul> <li>success criteria 1.2.5 Audio Descriptions (Pre- recorded).</li> </ul>
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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.	Include notice on: Job Descriptions Job Postings Offers of employment	Complete	January 1, 2016
23	Recruitment, Assessment or Selection Process	<ul> <li>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.</li> <li>(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.</li> </ul>	All applicants who are successful in obtaining a face to face interview must receive an email or meeting request with the following verbiage: "Navacord is committed to excellence in serving all customers, employees, job applicants, suppliers, and any visitors, including people with disabilities, and will carry out its functions and responsibilities in an appropriate manner to	Complete	January 1, 2016

		accommodate such individuals. If you require accommodation or more information, please let us know and we will work with you to meet your needs." Identify barriers utilizing: Accessible Interviewing Checklist			
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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.	Put a statement in hire letter	Complete	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.	Post policy on Navacord ADP and JDIMI.com Training provided if required All staff emails	Complete	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.	During orientation period – 60 days	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.	See 25 (1)	Ongoing	January 1, 2016

26	Accessible Formats & Communication Supports for Employees	<ul> <li>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,</li> <li>(a) information that is needed in order to perform the employee's job; and</li> <li>(b) information that is generally available to employees in the workplace.</li> </ul>	Functional audit of information specific to departments 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 what the employee will require – ie. Policy, communication supports that are available (text-to-speech, braille, large print, accessible PDFs, plain language versions, closed captioning	Ongoing	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.	Develop a process: Best Practices: Workplace Emergency Response Plan Individual Employee Response Information Form Identification of Potential	Ongoing	January 1, 2012

		Barriers During an Emergency Response		
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.	Part of process with employee's consent	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.	Part of process		January 1, 2012
27	<ul> <li>(4) Every employer shall review the individualized workplace emergency response information,</li> <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>	Part of process		January 1, 2012



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.	Process Developed	Ongoing	January 1, 2016
28		<ul> <li>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</li> <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 representative from the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent, where the employee is representative from the mathematical agent.</li> </ul>	Accommodation Process Individual Accommodation Plan		January 1, 2016

agent accor 5. The s privac 6. The fr indivisi be re mann 7. If an i	represented by a bargaining ent, in the development of the commodation plan. e steps taken to protect the vacy of the employee's personal. e frequency with which the ividual accommodation plan will reviewed and updated and the inner in which it will be done. In individual accommodation plan denied, the manner in which the isons for the denial will be			
8. The r accor takes	e means of providing the individual commodation plan in a format that es into account the employee's cessibility needs due to disability.			
Process employer (a) shall return emplo from requir accor work;	Every employer, other than an yer that is a small organization, all develop and have in place a urn to work process for its ployees who have been absent m work due to a disability and juire disability-related commodations in order to return to rk; and all document the process.	Process Developed	Complete	January 1, 2016

29		<ul> <li>29. (2) The return to work process shall,</li> <li>(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</li> <li>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</li> </ul>	Return to Work Process Return to Work Policy and Interview Guide	Complete	January 1, 2016
29		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.			January 1, 2016
30	Performance Management	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.	Need to keep individual accommodation plan in mind	Ongoing	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.	Need to keep individual accommodation plan in mind	Ongoing	January 1, 2016
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.	Need to keep individual accommodation plan in mind	Ongoing	January 1, 2016

URL: https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-1



### Accessibility rules for businesses and non-profits

The rules and deadlines businesses and non-profits must follow to meet accessibility standards in Ontario. The rules you need to follow depend on the type and size of your organization. You are exempt if you are self-employed and do not have employees.

### How to count your employees

Count all full-time, part-time, seasonal and contract workers. With most employees, you

- pay wages or a salary
- have control over the work assigned
- have a right to control the details of the work

Do not count employees outside Ontario. Do not count volunteers or independent contractors, but you are responsible for ensuring that the services they provide on your behalf follow the rules of Ontario's accessibility standards. You may need to ensure these individuals are trained to meet the requirements.

- 1. 1-19 employees (http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-o)
- 2. 20-49 employees (http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-1)
- 3. 50+ employees (http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-2)

### 1-19 employees

#### By January 1, 2012, you need to:

Provide accessible customer service (http://www.ontario.ca/page/how-make-customer-service-accessible)

- train your staff and volunteers to serve customers of all abilities
- welcome service animals and support persons
- create accessible ways for people to provide feedback
- put an accessibility policy in place so employees, volunteers and customers can know what to expect

#### Provide accessible emergency and public safety information (http://www.ontario.ca/page/how-makeinformation-accessible#section-1)

When asked, provide publicly available emergency information, like evacuation plans or brochures, in an accessible format.

#### Provide accessible emergency information to staff (http://www.ontario.ca/document/how-provide-emergencyinformation-accessible-employees)

When necessary, provide accessible and customized emergency information. You should provide this information as soon as an employee asks for it or when you become aware an employee may need accommodation in an emergency.

#### By January 1, 2015, you need to:

### Create accessibility policies (http://www.ontario.ca/document/how-create-accessibility-policies)

- this will help you achieve your accessibility goals
- · tell your employees and customers about your policies

Consider accessibility when purchasing or designing self-service kiosks (http://www.ontario.ca/page/how-make-self-service-kiosks-accessible)

This includes interactive electronic terminals that people use to pay parking fees, validate tickets, buy groceries and renew licences.

#### By January 1, 2016, you need to:

Train your staff on Ontario's accessibility laws (http://www.ontario.ca/page/how-train-your-staff-accessibility)

Train all your employees and volunteers on the accessibility requirements that apply to their job duties and your organization.

Make it easy for people with disabilities to provide feedback when asked (http://www.ontario.ca/page/howmake-information-accessible)

This includes surveys or comment cards.

#### By January 1, 2017, you need to:

#### Make your public information accessible when asked (http://www.ontario.ca/page/how-make-informationaccessible)

Work with the person to figure out how to meet their needs as soon as possible.

### Make your employment practices accessible (https://www.ontario.ca/page/accessible-workplaces)

This includes how you hire, retain and provide career development opportunities to all your employees.

#### By January 1, 2018, you need to:

#### Make new or redeveloped public spaces accessible (http://www.ontario.ca/page/how-make-public-spacesaccessible)

This applies to:

- recreational trails and beach access routes
- parking lots
- service counters
- fixed queuing guides
- waiting areas with fixed seating

### 20-49 employees

#### By January 1, 2012, you need to:

Provide accessible customer service (http://www.ontario.ca/page/how-make-customer-service-accessible)

- train your staff and volunteers to serve customers of all abilities
- keep a written record of the training
- welcome service animals and support persons
- create accessible ways for people to provide feedback
- put an accessibility policy in place, so your employees, volunteers and customers can know what to expect

#### Provide accessible emergency and public safety information (http://www.ontario.ca/page/how-makeinformation-accessible#section-1)

When asked, provide publicly available emergency information, like evacuation plans or brochures, in an accessible format.

#### Provide accessible emergency information to staff (http://www.ontario.ca/document/how-provide-emergencyinformation-accessible-employees)

When necessary, provide accessible and customized emergency information. You should provide this information as soon as an employee asks for it or when you become aware an employee may need accommodation in an emergency.

#### By December 31, 2014, you need to:

#### File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

#### By January 1, 2015, you need to:

### Create accessibility policies (http://www.ontario.ca/document/how-create-accessibility-policies)

- create policies to help you achieve your accessibility goals
- tell your employees and customers about your policies

#### Consider accessibility when purchasing or designing self-service kiosks (http://www.ontario.ca/page/howmake-self-service-kiosks-accessible)

This includes interactive electronic terminals that people use to pay parking fees, validate tickets, buy groceries and renew licences.

#### By January 1, 2016, you need to:

#### Train your staff on Ontario's accessibility laws (http://www.ontario.ca/page/how-train-your-staff-accessibility)

Train all your employees and volunteers on the accessibility requirements that apply to their job duties and organization.

### <u>Make it easy for people with disabilities to provide feedback when asked (http://www.ontario.ca/page/how-make-information-accessible)</u>

This includes surveys or comment cards.

#### By January 1, 2017, you need to:

Make your public information accessible when asked (http://www.ontario.ca/page/how-make-informationaccessible)

Work with the person to figure out how to meet their needs as soon as possible.

#### Make your employment practices accessible (http://www.ontario.ca/page/accessible-workplaces)

This includes how you hire, retain and provide career development opportunities to all your employees.

#### By December 31, 2017, you need to:

File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

#### By January 1, 2018, you need to:

#### Make new or redeveloped public spaces accessible (http://www.ontario.ca/page/how-make-public-spacesaccessible)

This applies to:

- recreational trails and beach access routes
- parking lots
- service counters
- fixed waiting lines
- waiting areas with fixed seating

#### By December 31, 2020, you need to:

#### File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

#### By December 31, 2023, you need to:

#### File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

#### 50+ employees

#### By January 1, 2012, you need to:

#### Provide accessible customer service (http://www.ontario.ca/page/how-make-customer-service-accessible)

- train your staff and volunteers to serve customers of all abilities
- keep a written record of the training
- welcome service animals and support persons
- · create accessible ways for people to provide feedback
- put an accessibility policy in place so your employees, volunteers and customers can know what to expect

#### Provide accessible emergency and public safety information (http://www.ontario.ca/page/how-makeinformation-accessible#section-1)

When asked, provide publicly available emergency information, like evacuation plans or brochures, in an accessible format.

#### Provide accessible emergency information to staff (http://www.ontario.ca/document/how-provide-emergencyinformation-accessible-employees)

When necessary, provide accessible and customized emergency information. You should provide this information as soon as an employee asks for it or when you become aware an employee may need accommodation in an emergency.

#### By January 1, 2014, you need to:

#### Create accessibility policies and a multi-year plan (http://www.ontario.ca/document/how-create-accessibilityplan-and-policy)

- create policies and a multi-year accessibility plan to help you achieve your accessibility goals
- · tell your employees and customers about your policies
- post the multi-year plan on your website in an accessible format

### Consider accessibility when purchasing or designing self-service kiosks (http://www.ontario.ca/page/how-make-self-service-kiosks-accessible)

This includes interactive electronic terminals that people use to pay parking fees, validate tickets, buy groceries and renew licences.

#### Make websites accessible (http://www.ontario.ca/page/how-make-websites-accessible)

This includes only new websites and old websites you significantly update and new web content you create.

#### By December 31, 2014, you need to:

#### File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

#### By January 1, 2015, you need to:

#### Train your staff on Ontario's accessibility laws (http://www.ontario.ca/page/how-train-your-staff-accessibility)

Train all your employees and volunteers on the accessibility requirements that apply to their job duties and your organization.

Make it easy for people with disabilities to provide feedback (http://www.ontario.ca/page/how-makeinformation-accessible)

This includes surveys or comment cards.

#### By January 1, 2016, you need to:

<u>Make your public information accessible when asked (http://www.ontario.ca/page/how-make-information-accessible)</u>

Work with the person to figure out how to meet their needs as soon as possible.

#### Make your employment practices accessible (http://www.ontario.ca/page/accessible-workplaces)

- make how you hire, retain and provide career development opportunities accessible
- document your processes for developing individual accommodation plan and return-to-work plans

#### By January 1, 2017, you need to:

#### Make new or redeveloped public spaces accessible (http://www.ontario.ca/page/how-make-public-spacesaccessible)

- recreational trails and beach access routes
- outdoor public use eating areas
- outdoor play spaces
- public outdoor paths of travel
- parking lots
- service counters
- fixed waiting lines
- waiting areas with fixed seating

#### By December 31, 2017, you need to:

File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

#### By December 31, 2020, you need to:

#### File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

By January 1, 2021, you need to:

Make all websites and web content accessible (http://www.ontario.ca/page/how-make-websites-accessible)

#### By December 31, 2023, you need to:

File an Accessibility Compliance Report (http://www.ontario.ca/page/how-complete-your-accessibilitycompliance-report)

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