

INTEGRATED ACCESSIBILITY STANDARDS ACTION PLAN - ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

1 - 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.	Created policy and published company wide	Completed	January 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.	Create Plan Identify Barriers – Management Team Post plan on website Human Resource review every 5 yrs in January	Complete Ongoing Complete Ongoing	January 2014 Ongoing Sept 2020 Ongoing
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.	Mandate AODA Training AODA training integrated into Onboarding process for all levels Training certificates stored in employee files	Ongoing	January 2015

2 - 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.	<p>Ensure feedback mechanisms are in place, email, phone, in-person, web access and tool are available in branch</p> <p>Accessible formats and communication support will be provided upon request.</p> <p>During onboarding staff and management are made of aware of the need to accommodate upon request</p>	Ongoing	January 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.	<p>Accessible formats and communication supports are in place and provided upon request within a timely manner</p> <p>Communication to staff and management that no additional charge is required</p>	Ongoing	January 2016
12		<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> <p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Communicate to staff and management in P & P</p> <p>Post in-branch on front door Post on website</p>	<p>Ongoing</p> <p>Ongoing</p>	January 2016

Section	Initiative	Description	Action	Status	Compliance Date
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.	Not applicable at this time	Not applicable	January 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.	Continuously review WCAG guidelines to be informed of changes and updates.	Complete Ongoing	January 2014 WCAG 2.0 Level A. January 2021 WCAG 2.0 Level AA, other than success criteria 1.2.4. Captions (Live) Success criteria 1.2.5 Audio (pre-recorded).

3 - 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.	Statement included in all job ads Statement included in offer of employment	Ongoing	January 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 applicants' accessibility needs due to disability.	Notify applicants with statement in all job ads Identify barriers; locations of interview rooms, format of test, room set up for in-person interview, interview timelines, supports, paperwork Managers to notify and work with HR to provide accommodation as required for candidates	Ongoing	January 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.	Statement included in the offer of employment	Ongoing	January 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.	Accessibility policies posted and adhered to by all staff	Ongoing	January 2016

Section	Initiative	Description	Action	Status	Compliance Date
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Included in onboarding process	Ongoing	January 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.	Policies changed, distributed and accessible to all required parties within 24 hours of change	Ongoing	January 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 in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.	HR to review and process all requests, place documentation in employee file, provide direction to all co-workers and supervisors for implementation and to facilitate ongoing accommodation	Ongoing	January 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 (policy, communication supports that are available (text to speech, braille, large print, accessible PDF's, plain language versions, closed captioning)	Ongoing	January 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.	HR to review and process all requests, place documentation in employee file, provide direction to all co-workers and supervisors for implementation and to facilitate ongoing accommodation	Completed and ongoing as requested or required	January 2012

Section	Initiative	Description	Action	Status	Compliance Date
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	Completed and Ongoing as requested or required.	January 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	Completed and Ongoing as requested or required.	January 2012
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.	Part of process	Completed and Ongoing as requested or required.	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.	Documented process policies in place Forms and policies accessible to all employees	Ongoing	January 2016

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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. 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 takes into account the employee's accessibility needs due to disability. 	<p>Record plan & follow process</p> <p>Individual accommodation plan</p> <p>Document and implement all necessary accommodation measures and solicit feedback from employee at regular intervals to determine any addition needs</p>	Ongoing	January 2016

Section	Initiative	Description	Action	Status	Compliance Date
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>	Developed process for employees returning to work after a disability-related leave of absence.	Ongoing	January 2016
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>	Ongoing documentation and accommodation specific to the employee needs	Ongoing	January 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.	Management is required to consult with HR prior to any performance management discussion to determine any needs and make any necessary accommodation for the individual	Ongoing	January 2016

Section	Initiative	Description	Action	Status	Compliance Date
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.	To be determined individually by person Accommodation plan implemented based on individual requirements	Ongoing	January 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.	To be determined individually by person Accommodation plan implemented based on individual requirements	Ongoing	January 2016