

## 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.	<ul style="list-style-type: none"><li>- Posted to website</li></ul>	Completed	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, <ul style="list-style-type: none"><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 their website, if any, 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>	<ul style="list-style-type: none"><li>- Plan has been created and will be updated as needed and requirements are met</li><li>- Posted to website as per legislation</li></ul>	Completed	January 1, 2014

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Section	Initiative	Description	Action	Status	Compliance Date
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.	<ul style="list-style-type: none"> <li>- Will be looking into various training options.</li> <li>- Managers and Employees will be trained separately</li> <li>- Plant HR Coordinators to train the location employees</li> <li>- Corp. HR to train the office locations</li> </ul>	On going	January 1, 2015

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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.	- Requests will be handled on a case by case basis and any disputes handled through Human Resources	On going	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.	- Requests will be handled on a case by case basis and any disputes handled through Human Resources	On going	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.	- Requests will be handled on a case by case basis and any disputes handled through Human Resources	On going	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	- The policy and our plan will be posted on the company website by January 1, 2014	On going	January 1, 2016

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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.	<ul style="list-style-type: none"> <li>- Requirements provided to appropriate IT staff</li> <li>- No new website content for January 2014</li> </ul>	On going	<p><b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <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>

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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.	<ul style="list-style-type: none"> <li>- Update recruitment process to include communication on availability of accommodation if needed</li> </ul>	On going	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>	<ul style="list-style-type: none"> <li>- Requests will be handled by HR and hiring managers as needed</li> <li>- Notification that accommodation is available will be given at the time of the assessment</li> </ul>	On going	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.	<ul style="list-style-type: none"> <li>- Notification will be made in the New Hire Packages</li> </ul>	On going	January 1, 2016

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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.	- Information will be available on the Company Intranet and through policy training	On going	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.	- Information will be provided in the New Hire Orientation	On going	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.	- All changes will be updated on the company Intranet and via email	On going	January 1, 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	- Manager will work with HR to determine appropriate accommodation as needed.	On going	January 1, 2016

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		employees in the workplace.			
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	- Manager will work with HR to determine appropriate accommodation as needed.	On going	January 1, 2016

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Section	Initiative	Description	Action	Status	Compliance Date
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.	- Included in IAS policy which is provided to each employee	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.	- Manager and HSE Manager to handle on case by case basis	On going	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.	- Manager and HSE Manager to handle on case by case basis	On going	January 1, 2012

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27		<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>- Manager and HSE Manager to handle on case by case basis</li> </ul>	On going	January 1, 2012
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Section	Initiative	Description	Action	Status	Compliance Date
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.	- Templates are available and requests will be handled on case by case basis	On going	January 1, 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"> <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 plan.</li> <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>	<ul style="list-style-type: none"> <li>- Exact format to be determined on a case by case basis taking into consideration the employee's disability and need for accommodation</li> </ul>	On going	January 1, 2016
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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>	<ul style="list-style-type: none"> <li>- Current Return to Work policy covers this requirement.</li> </ul>	On going	January 1, 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>	<ul style="list-style-type: none"> <li>- Current Return to Work policy covers this requirement.</li> <li>- B) Implement use of individual documented return to work plans for non-occupational illness or injury</li> </ul>	On going	January 1, 2016
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>	<ul style="list-style-type: none"> <li>- See above</li> </ul>	On going	January 1, 2016

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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.	- Manager and Human Resources to handle on a case by case basis	On going	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.	- Manager and Human Resources to handle on a case by case basis	On going	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.	- Manager and Human Resources to handle on a case by case basis	On going	January 1, 2016

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