

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

**INTEGRATED ACCESSIBILITY STANDARDS – Multi-Year Accessibility Plan**

<b>Date Issued:</b> June 22, 2021 <b>Date Reviewed and Updated By Human Resources:</b> June 22, 2021 <b>Related:</b> Ontario Integrated Accessibility Standards Policy and Accessible Client Service Plan– Ontario					
<b>Part I – GENERAL REQUIREMENTS</b>					
<b>Section</b>	<b>Initiative</b>	<b>Description</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>
3(1)	Establishment of Accessibility Policies	<p>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.</p> <p>All policies must include a statement of organizational commitment to accessibility.</p>	Ontario Integrated Accessibility Standards complete and posted on the intranet and the Company's external website.	Completed	January 2014
4(1)(a)	Accessibility Plans	<p>4(1) Large organizations shall:</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organizations’ strategy to prevent and remove barriers and meet its requirements under this Regulation.</p>	This multi year plan has been implemented and is maintained.	Completed	January 2014
4(1)(b)	Accessibility Plans	<p>4(1) Large organizations shall:</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request.</p>	Completed.	Completed	January 2014
4(1)(c)	Accessibility Plans	<p>4(1) Large organizations shall:</p> <p>c) review and update the accessibility plan at least once every five years.</p>	Human Resources will review this multi year accessibility plan at least once every five years.	Completed	January 2014
6(2)	Self-Serve Kiosks	6(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Not Applicable.	Not Applicable	January 2014

7(1)	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 organizations' policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	We are currently in the process of updating our AODA training program and platform. We have experienced a disruption due to the COVID-19 pandemic; and as a result, we expect to achieve compliance in 2022. During this time, we will continue to maintain our current training practices.	Ongoing	January 2015
<b>PART II – Information and Communications Standards</b>					
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.  11(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process	Our Accessible Client Service Plan and our Ontario Integrated Accessibility Standards have been posted on the and the Company's external website.	Completed & Ongoing	January 2015
12(1)	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 persons' accessibility needs due to disability; and  b) at a cost that is no more than the regular cost charged to other persons.	Our Accessible Client Service Plan and our Ontario Integrated Accessibility Standards have been posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
12(2)	Accessible Formats & Communication Supports	12(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Our Ontario Integrated Accessibility Standards, which outlines this process and have been posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016

12(3)	Accessible Formats & Communication Supports	12(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
13(1)	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.	Not applicable.	January 2012
14(2)	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.	Although, not fully compliant with the WCAG requirements, we commit that in our next annual budget plan (March 2022) resources will be allocated to review steps to meet compliance in Ontario.	Ongoing	January 2014:  New internet websites and web content on those sites must conform with WCAG 2.0 Level A.  January 2021:  All internet websites and web content must conform with WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded).

**PART III – Employment Standards**

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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.  Job postings for vacant positions in Ontario offices will have a statement about the availability of accommodations and how to request accommodations.	Completed & Ongoing	January 2016
23(1) and 23(2)	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.  23(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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & 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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
25(1)	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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on intranet and the Company's external website.  We are currently in the process of updating our AODA training program and platform. We have experienced a disruption due to the COVID-19 pandemic; and as a result, we expect to achieve compliance in 2022. During this time, we will	Completed & Ongoing	January 2016

			continue to maintain our current training practices.		
25(2)	Informing Employees of Supports	25(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	We are currently in the process of updating our AODA training program and platform. We have experienced a disruption due to the COVID-19 pandemic; and as a result, we expect to achieve compliance in 2022. During this time, we will continue to maintain our current training practices.	Completed & Ongoing	January 2016
25(3)	Informing Employees of Supports	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 employees' accessibility needs due to disability.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
26(1)	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 employees' job; and  (b) information that is generally available to employees in the workplace.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
26(2)	Accessible Formats & Communication Supports for Employees	26(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
27(1)	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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2012

			Emergency response information is discussed during the first week of work, during a return to work from a disability leave and upon an employee notifying HR of a disability requiring assistance.		
27(2)	Workplace Emergency Response Information	27(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employees' consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.  A list of persons requiring assistance is provided to Fire Marshal of the company.	Completed & Ongoing	January 2012
27(3)	Workplace Emergency Response Information	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 employees' disability.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.  An updated list of persons requiring assistance is provided to the Fire Marshal of the company once a month.	Completed & Ongoing	January 2012
27(4)	Workplace Emergency Response Information	(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 employees' overall accommodations needs, or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2012
28(1)	Documented Individual Accommodation Plans	28(1) Employers, other than employers that are small organizations, shall develop and have in place a <b>written process</b> for the development of documented individual accommodation plans for employees with disabilities.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed	January 2016

28(2)	Documented Individual Accommodation Plans	<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 employers' expense, to determine if and how accommodation can be achieved.</li> <li>4. The steps taken to protect the privacy of the employees' personal.</li> <li>5. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>6. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>7. The means of providing the individual accommodation plan in a format that takes into account the employees' accessibility needs due to disability.</li> </ol>	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed	January 2016
29(1)	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 <b>return to work process</b> 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>	<p>This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.</p> <p>The process includes working in conjunction with the short term and long-term disability benefits provider during an employee's return to work.</p>	Completed & Ongoing	January 2016
29(2)	Return to Work Process	<p>29(2) The return to work process shall:</p> <ol style="list-style-type: none"> <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> </ol>	<p>This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.</p> <p>The process includes working in conjunction with the short term and long-term disability benefits provider during an employee's return to work.</p>	Completed & Ongoing	January 2016

29	Return to Work Process	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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.  The process includes working in conjunction with the short term and long-term disability benefits provider during an employee's return to work.	Completed & Ongoing	January 2016
30(1)	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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
31(1)	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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
32(1)	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.	This is included in our Ontario Integrated Accessibility Standards, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2016
<b>Part IV – Design of Public Spaces Standards</b>					
80.41 (1)	Service Counters	80.41 (1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met:  1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters.  2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters. O. Reg. 413/12, s. 6.	Has not yet been applicable	Ongoing	January 2017



		(2) The service counter that accommodates mobility aids must meet the following requirements: 1. The countertop height must be such that it is usable by a person seated in a mobility aid. 2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required. 3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid.			
80.42	Fixed Queuing Guides	80.42 When constructing new fixed queuing guides, the following requirements must be met: 1. The fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices. 2. The fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction. 3. The fixed queuing guides must be cane detectable.	Has not yet been applicable	Ongoing	January 2017
80.43	Waiting Areas	80.43 (1) When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space. O. Reg. 413/12, s. 6.  (2) For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait. O. Reg. 413/12, s. 6.	Has not yet been applicable	Ongoing	January 2017
<b>PART IV.2 – Customer Service Standards</b>					
80.46(1)	Establishment of policies	80.46 (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities	Our Accessible Client Service Plan is complete and posted on the intranet and the Company's external website.	Completed	January 2012
80.48 (1)	Notice of temporary disruptions	80.48 (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 165/16, s. 16.	Our Accessible Client Service Plan addresses this and we have a template notice drafted	Ongoing	January 2012
80.49 (1)	Training for staff, etc.	80.49 (1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:	We are currently in the process of updating our AODA training program and platform. We have experienced a disruption due to the COVID-19 pandemic; and as a result, we expect to achieve	Completed and ongoing	January 2012

			compliance in 2022. During this time, we will continue to maintain our current training practices.		
80.50 (1)	Feedback process	80.50 (1) Every provider shall establish a process for receiving and responding to, (a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and (b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3). O. Reg. 165/16, s. 16.	Our Accessible Client Service Plan has been posted on the intranet and the Company's external website.	Completed & Ongoing	January 2012
80.51 (1)	Format of documents	80.51 (1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support, (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. O. Reg. 165/16, s. 16. (2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 165/16, s. 16.	This is included in our Accessible Client Service Plan, which is posted on the intranet and the Company's external website.	Completed & Ongoing	January 2012