

# 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.	Review draft with Senior Management for approval	Ongoing, pending approval of sr mgmt..	January 1, 2014
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>a) Attended workshop, started drafting plan</p> <p>Identify and Review barriers by dealership</p> <p>Consider establishing committee by dealership</p> <p>b) to be posted upon approval</p> <p>c) HR will review on regular basis</p> <p>Once completed HR review will review every 5 years as required by legislation</p>	Ongoing, pending approval of sr. mgmt..	January 1, 2014

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.	Policy consistent with training requirements  Determine method of training for management and employees with HR  At minimum, will have two levels of training – management & employees; will explore to see if additional level of training needed	Ongoing	January 1, 2015
---	----------	--	--	---------	-----------------

**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.	Review of feedback processes in company, both internally and externally  Determine what accessible formats we can make available by request  Ensure managers/staff are aware of accommodation by request (through training)	Ongoing	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.	Determine what accessible formats we will make available by request (PDF, Word, reading) both internally and externally  determine what the timely manner is for each alternate format, for those not available immediately, will communicate back within how long (24 hours)? Yes we can, or no we	Ongoing	January 1, 2016

			<p>can't, but can provide...</p> <p>determine current costs</p>		
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>Communicate to staff through training</p> <p>Protocol when accommodation cannot be met (alternate accommodation)</p> <p>Where questions arise, advice from HR is recommended</p>	Ongoing	January 1, 2016
12		<p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Post signs at reception, on website, intranet, printed materials</p> <p>Based on how do we communicate with the public</p> <p>How do we communicate with our employees</p> <p>*look for examples, take pics</p>	Ongoing	January 1, 2016
13	Emergency Procedures, Plans or Public Safety Info	<p>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.</p>	<p>Included in Emergency Response Plan</p>	Completed	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.	Review with Marketing Department who oversees company website  Sent initial information to Marketing Department	Ongoing	<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>
----	-----------------------------------	---	---	---------	---

**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.	<p>Review recruitment process</p> <p>Where are we advertising?</p> <p>Wording in Job ads and Job Descriptions</p> <p>“We are committed to providing accommodations for persons with disabilities. If you require accommodation we will work with you to meet your needs”. – this should be woven in to all policies, training</p>	Ongoing	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>	<p>Determine how we notify all applicants</p> <p>Appropriate language to use – only through HR??</p> <p>Identify interview room</p> <p>Develop interview guidelines</p> <p>Review Orientation/training processes</p>	Ongoing	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	<p>Common language for all applicants</p> <p>Notification through HR</p>	Ongoing	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.	Develop and train managers on interviewing checklist  Circulating policy to all employees – through email, intranet, HR Bulletin Boards, added to New Hire Package  Training of employees	Ongoing	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.	Build in to Orientation program	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 above	Ongoing	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 employees in the workplace.	Review format of Job Descriptions, SOP, MSDS sheets, New Hire Forms, other information staff is required to have to do their job – what is available and how is it available  Be open to accommodations  Create process, including HR department	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.	See 26.1 above	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.	In Emergency Response Plan	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.	In Emergency Response Plan	Completed	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.	In Emergency Response Plan	Completed	January 1, 2012

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>	In Emergency Response Plan	Completed	January 1, 2012
28	Documented Individual Accommodation Plans	<p>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.</p>	<p>Will review template process and Develop process with HR</p> <p>Create individual Accommodation Plan template with HR</p> <p>*include in New Hire Forms</p>	Ongoing	January 1, 2016
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> </ol>	<p>Will review template process and adopt – meets all 8 requirements</p> <p>*include in New Hire Forms</p>	Ongoing	January 1, 2016



		<p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>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>			
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>	Review RTW Process to ensure it meets requirements	Ongoing	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>	<p>Review current process</p> <p>Review template for Job Task Analysis with HR</p>	Ongoing	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>	<p>Review current process</p>	Ongoing	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>	<p>Review current process, using accommodation if applicable</p> <p>Review written, verbal, how long to review</p> <p>Contact association for deaf, blind to see how they can assist with accommodation</p>	Ongoing	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 accommodation plans, when providing career development and advancement to its employees with disabilities.</p>	<p>Review current process</p> <p>How persons with disabilities can access and apply for advancement</p> <p>Contact association for deaf, blind to see how they can assist with accommodation</p>	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.	Review current process  Contact association for deaf, blind to see how they can assist with accommodation	Ongoing	January 1, 2016
----	--------------	--	---	---------	-----------------

## Document Management

Effective Date:	January 1, 2014
Revision Date:	
Revision Date:	