



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.	Policy approved	Completed	January 1, 2014 Updated December 2023
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.	Attended AODA workshop. Involve management regarding barriers. Conduct focus groups. Contact Karen Four and IT regarding posting on website.	Completed	January 1, 2014 Reviewed December 2023

6	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.	N/A at this time	N/A	January 1, 2014 Reviewed and confirmed December 2023.
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.	Determine method of training to include all parts of integrated standards and HR Code, budget, who will conduct training. 1) Management training sessions- needs for accommodation, how to handle requests, performance management, etc. 2) Employee training 3) Determine method of training for co-ops, students, etc.	New hire training via HR Downloads and ADP. Propose to relaunch to all employees in Q1-2024.	January 1, 2015 Reviewed and confirmed December 2023

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.	<p>Conduct an assessment to identify all channels of internal or external feedback at organization</p> <p>Speak to all functional areas to identify i.e. marketing, sales, customer service</p> <p>Determine alternative methods for feedback channels if requested.</p> <p>Communicate to people who administer feedback process.</p>	Ongoing	<p>January 1, 2015</p> <p>Reviewed and confirmed December 2023.</p>
12	Accessible Formats & Communication Supports	<p>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> <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>Determine what our go-to alternative formats are going to be i.e. visible and auditory.</p> <p>Organization will make final decision on accessible format and convey this to the individual, as required.</p> <p>Accommodation Policy to be issued in January 2024.</p> <p>Communicate to employees and management this requirement and what expectations are in terms of how to handle this request.</p> <p>Develop escalation process if an agreement can’t be reached.</p>	<p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2016</p> <p>Reviewed and confirmed December 2023</p> <p>January 1, 2016</p> <p>Reviewed and confirmed December 2023</p>

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Post on organization website and signage at front reception desks.	Ongoing	January 1, 2016 Reviewed and confirmed December 2023
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.	N/A	N/A	January 1, 2012 Confirmed December 2023
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.	Launch of new and updated website scheduled for end of January 2024 to achieve full compliance with WCAG Level AA. WCAG 2.0	Completed.	January 31, 2024

15	Educational & Training Resources & Materials	<p>15(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <ol style="list-style-type: none"> 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, <ol style="list-style-type: none"> i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format. 2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities. 	N/A	N/A	<p>January 1, 2013</p> <p>Confirmed December 2023</p>
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16	Training to Educators	16(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.	N/A	N/A	January 1, 2013 Confirmed December 2023
		(2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.			January 1, 2013
17	Producers of Educational or Training Material	17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.	N/A	N/A	January 1, 2015 For accessible or conversion ready versions of textbooks Confirmed December 2023
		(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.			January 1, 2020 For accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources. Confirmed December 2023.

18	Libraries of educational & training institutions	<p>18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request.</p> <p>(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).</p>	N/A	N/A	<p>January 1, 2015 For print-based resources or materials</p> <p>January 1, 2020 For digital or multimedia resources or materials</p> <p>Confirmed December 2023</p>
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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.	Consistently review to ensure practices are being followed.	Completed	January 1, 2016 Reviewed and confirmed December 2023
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 applicant's accessibility needs due to disability.	Consistently review to ensure practices are being followed.	Completed	January 1, 2016 Reviewed and confirmed December 2023
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.	All offers of employment confirm DCM is an equal employment opportunity employer and includes an accommodation statement	Completed	January 1, 2016 Reviewed and confirmed December 2023

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.	<p>Determine how organization will communicate new policies i.e. online and paper postings.</p> <p>Restated on ADP home page and will be relaunched in Q1-2024 to all employees.</p>	Completed	Reviewed and confirmed December 2023.
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25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	As part of onboarding.	Completed	January 1, 2016 Reviewed and confirmed December 2023
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 Any changes will be launched via ADP.	Completion Q1-24	January 1, 2016 Reviewed and confirmed December 2023
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.	Upon request from employee, employer will develop appropriate accommodation. Utilize job descriptions to define job essentials.	Completed	January 1, 2016 Reviewed and confirmed December 2023
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	The Accommodation Policy to be issued in January 2024 will handle this scenario.	Complete	January 1, 2016 Reviewed and confirmed December 2023

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.	Communicate company-wide if anyone requires assistance in event of emergency, what process is, who to contact and that it will be handled confidentially.	Completed	January 1, 2012 Reviewed and confirmed December 2023.
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.	Meet with employee and determine action.	Completed	January 1, 2012 Reviewed and confirmed December 2023
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.	Upon being notified by employee, employer will meet with employee and determine action.	Completed	January 1, 2012 Reviewed and confirmed December 2023
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.	Upon being notified by employee, employer will meet with employee and determine action and will adjust if required.	Completed	January 1, 2012 Reviewed and confirmed December 2023

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.	Refer to Accommodation Policy	Completed	January 1, 2016 Reviewed and confirmed December 2023
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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. 	Refer to Accommodation Policy	Completed	<p>January 1, 2016</p> <p>Reviewed and confirmed December 2023</p>
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		<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>	Refer to Return to Work Policy and Functional Abilities Form.	Completed	<p>January 1, 2016</p> <p>Reviewed and confirmed December 2023.</p>

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>		Completed	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>		Completed	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>At this time, there are no employees that require this but will be monitored.</p>	Completed	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>Policy created.</p>	Complete	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.	Policy created.	Complete	January 1, 2016
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