

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"> - Customer Service Policy - Integrated Accessibility Policy 	Complete & posted to web site	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>Review & identify barriers. Discussion with Mgmt team at Ontario locations</p> <p>Suzana Furtado reviewed web site posting process</p> <p>Review every ¼ until plan is complete</p> <p>Responsibility assigned for updates at each Ontario location. Feedback to be forwarded to Human Resources Director for inclusion</p>	Completed & posted to web site	January 1, 2014

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.	Not Applicable	N/A	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.	Customer service standard training complete 100% Integrated Accessibilities Standard on-line training through Pro-Learning for Label & Corporate complete 100%. On-line training at Avery complete 100%.	Complete	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.	<p>Internal: review all feedback processes</p> <ul style="list-style-type: none"> - sharepoint suggestion system (Label) - written documents - pdf documents - verbal discussion with feedback transcribed <p>External: e-mail, phone, in writing or verbal welcome</p>	Complete	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.	<p>Source rental facility / providers for audio / visual assistive devices for people with disabilities</p> <p>Upon request we will provide any communications in alternate formats (larger font, pdf, hard copy, reading out loud etc.)</p> <p>Review marketing documentation / sales documentation</p>	Complete	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.	Review accessibility plan format from pro-learning and modify to meet our needs	Complete	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Addressed during customer service compliance (invoice, web site & reception postings)	Complete	January 1, 2016

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.	Current plan is sufficient – public emergency safety procedures not required and internal program to manage guests sufficient	Complete	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.	Any web site update from 2012 on must meet international web standard guidelines	Website Manager is aware of the requirements	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded).

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. 	Not Applicable	N/A	January 1, 2013
16	Training to Educators	<p>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.</p>	Not Applicable	N/A	January 1, 2013

		(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.	Not Applicable	N/A	January 1, 2015 For accessible or conversion ready versions of textbooks
		(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.
18	Libraries of educational & training institutions	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. (2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).	Not Applicable	N/A	January 1, 2015 For print-based resources or materials January 1, 2020 For digital or multimedia resources or materials

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"> - Add language to web site in employment opportunities section - Statement to be included in all job postings (Complete) - Review interview process (Complete) - Wording added to offer letters (Complete) - Add review to orientation checklist (Complete) 	<p>Website Manager is aware of the requirements</p> <p>Documentation Complete</p>	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 applicants</p> <ul style="list-style-type: none"> - Over phone - Review recruitment agency practices and obtain documentation to confirm AODA compliance <p>Review who will handle requests for accommodation at each Ontario site (Complete)</p> <p>Review applicant testing processes</p>	Complete	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.	Offer letter has been revised	Complete	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.	Consider forms of communication to be used: <ul style="list-style-type: none"> - Q&A - Postings - Sharepoint 	Complete	
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> - Add to orientation checklist 	Complete	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.	Consider forms of communication to be used (as per 25 (1)): <ul style="list-style-type: none"> - Q&A - Postings - Sharepoint 	Complete	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.	Will develop a process on how to address this. <ul style="list-style-type: none"> - Review job descriptions to ensure bona fide requirements only (Complete) - PDA complete for all Label production positions (Complete) - Ergonomic review complete for all Label positions (Complete) 	Complete	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.	Define standard formats we will offer: <ul style="list-style-type: none"> - Large font - Pdf - Verbal - Written - Sharepoint - On-line Source provider for audio / visual technical disability aids	Complete	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.	Complete	Complete	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.	Complete	Complete	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.	Complete	Complete	January 1, 2012

27		<p>(4) Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> (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. 	Complete	Complete	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>Current RTW procedures to be reviewed to include accommodations for disabilities. Third party provider to adjudicate claims.</p> <p>Reference pro-learning samples for process and plan formats</p>	Complete	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"> 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 		Complete	January 1, 2016

		<p>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>			
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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>	<p>Review current procedure considering AODA requirements considering accommodation request more permanent in nature than current plan addresses</p> <p>Review with third party claims adjudicator to ensure they have systems in place that are in compliance.</p>	Complete	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>Already included in the RTW procedure</p> <p>Reference plan format in procedure</p>	Complete	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>			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:</p> <ul style="list-style-type: none"> - language in forms - formats forms available - alternate formats available upon request 	Complete	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.	Internal transfer policy – include wording regarding accommodation for people with disabilities	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.		Complete	January 1, 2016