

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

**INTEGRATED ACCESSIBILITY STANDARDS: MULTI-YEAR ACCESSIBILITY PLAN**

**Part I – GENERAL REQUIREMENTS/INTEGRATED STANDARDS**

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 developed and approved by General Manager.	Complete	January 1, 2014
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.	Director of Marketing & Events to post accessibility plan and policy on web site.  Management will review plan annually.	Complete	December 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.	Identified all kiosks and will consider accessibility during replacement cycle.  Kiosks include ATMs & pay-parking machines in an appropriate manner	Complete	December 1st, 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.	To determine method of training and number of training levels.  Require separate training module for senior management and one for all employees... classroom, e-learning, or blended.	Ongoing	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.	Conduct a review of all feedback processes across the organization internally and externally. Consult with all functional areas to make sure all feedback processes are captured.  Determine what accessible formats and communication supports will be provided upon request.  Ensure staff and management are aware of the need to provide accessible formats and communication supports upon request.	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 and communication supports we will provide to persons with disabilities upon request.  Ensure these formats and supports can be provided in a timely manner (ie: upon request or within 24 hours) and what, if any, costs may apply.	Ongoing	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.	<p>Communicate to team members and management this requirement. This will be communicated in AODA training modules.</p> <p>Develop protocol for situations where suitable agreement cannot be reached.</p>	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<p>Have a sign posted in hotel lobby, Hostess stand and Catering Reception area.</p> <p>Posted on website (IT).</p> <p>Include notice on some print materials (marketing).</p>	Ongoing	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.	Developed process.	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.	<p>Review underway of required changes that need to be made to websites by Jan. 1<sup>st</sup> 2014</p> <p>Director of Marketing &amp; Events when using a web designer or making any significant changes, to continuously review WCAG guidelines to be informed of changes and updates.</p>	<p>Complete</p> <p>Ongoing</p>	<p><b>January 1, 2014</b></p> <p>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.	<p>Include a statement in recruitment and marketing collateral used as well as the job posting itself.</p> <p>Example: We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs.</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</p>	<p>Determine how to notify applicants; telephone, email, letter? Will designate a contact person to handle queries regarding accessibility and employment.</p> <p>Identify barriers: location of</p>	Ongoing	January 1, 2016

		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.	interview room, format of tests, room set-up for in person interviews, interview timelines, support, paperwork.  Review and revise interview guidelines for suitability.		
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.	Consider adding a statement in the offer letter.  Consider scripting the verbal offer of employment to include this statement.	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.	Circulate the policy. Training. Posters.	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.	Will be part of the New Hire Orientation training.	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.	Circulate the policy. Training. Posters.	Ongoing	January 1, 2016

26	Accessible Formats & Communication Supports for Employees	<p>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,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) Information that is generally available to employees in the workplace.</p>	Conduct an audit of information specific to departments by January 1, 2016		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.	Will develop policy/process to identify what the employee will require: policy, communication supports that are available (text to speech , braille, large print, accessible PDFs, plain language versions, closed captioning) .	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.	<p>Communicate and request that team members self identify need for accommodation in New Hire Orientation.</p> <p>Include need for accommodation on the new hire check list.</p> <p>Prepare individual plan as required.</p>	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.	Implement 'Evacuation System' as required.	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.	Information will be provided to employee by HR in suitable format.	Complete	January 1, 2012
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.	Develop and review process as required.	Complete	January 1, 2012
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.	Develop a process.  Determine who needs to be involved.	Ongoing	January 1, 2016
28		28 (2) The process for the development of documented individual accommodation plans shall include the following elements:  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	Develop a process	Ongoing	January 1, 2016

		<p>medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</p> <ol style="list-style-type: none"> <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>			
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>Review to ensure current process to ensure it meets requirements.</p> <p>If not, develop process for employees RTW after a disability related leave of absence.</p>	Ongoing	January 1, 2016



		(b) shall document the process.			
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>	Review current process.	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>	Include this statement in policy.	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 the current process.</p> <p>Need to keep individual accommodation plans in mind.</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 the current process.</p> <p>Need to keep individual plans in mind.</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 the current process Keeping in mind the individual plans.	Ongoing	January 1, 2016
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