

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 prepared and communicated.	Posted	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.	Plan prepared and will be implemented in accordance with timeframes Multi-Year Plan posted on Company website and company intranet HR will review once per year or when changes are required	Ongoing	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	All employees with receive training through training brochure and managers and supervisors will receive training brochure and IAS Policy.	On track	January 1, 2015

		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.			
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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.	All feedback processes across the organization (internally and externally) are being reviewed. Will determine what accessible formats and communication supports we will provide or are required upon request All staff and management will be aware of the need to accommodate 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 (i.e. large font, verbal, electronic, PDF) Ensure these formats and supports can be provided in a timely manner (ex. Same time, 24 hours) Communicate to staff and management that no <u>additional</u> charge is required	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.	Communicate to staff and management this requirement Develop protocol for situations where a suitable agreement cannot be made	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Policy posted on website	Pending	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.	Public safety information is available for persons with disabilities, upon request. This applies to vendors, contractors or other persons who will not be supervised by an Array employee.	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.	Website changes will comply with AODA requirements and international standards.	Complete Will be launched by January 1, 2015	After January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. January 1, 2021 All internet websites and web content must conform with WCAG 2.0

					<p>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).
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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>We will Include a statement in job advertisements such as:</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.”</p>	Pending	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</p>	<p>Applicants will be notified via telephone or email.</p> <p>Identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork</p> <p>Will develop interview guidelines</p>	On Track	January 1, 2016

		accommodation in a manner that takes into account the applicant's accessibility needs due to disability.	(Interview Script Guidelines) (Accessible Interviewing Checklist)		
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.	Hire Letter will reflect this requirement. (Notification to Successful Applicants)	On Track	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.	Employees will be informed through training programs, which includes Policy rollout.	On Track	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.	New employees will be informed as soon as practicable after commencing of employment.	On Track	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.	Updated policies will be rolled out to employees as soon as changes have been approved.	On Track	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			January 1, 2016

		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 explore types of information specific to departments for employees to do their work as necessary Will explore the types of regular communications that require accommodation	On Track	
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Employees will be consulted in determining the suitability of accessible formats or communication supports.	On Track	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.	Process has been established whereby employees inform their manager or HR of a disability that may impact their ability to respond in emergency situations.	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.	Part of process with employee's consent	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	Part of current process	Complete	January 1, 2012

		to the employee's disability.			
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.	Part of current process	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.	Process to be developed		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 medical or other expert, at the employer's expense, to determine if	The following processes will be implemented as applicable. (Accommodation Process) (Individual Accommodation Plan) (Functional Capacity Assessment Form)		January 1, 2016

		<p>and how accommodation can be achieved.</p> <ol style="list-style-type: none"> 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. 5. The steps taken to protect the privacy of the employee's personal. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. 			
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</p>	Develop process for employees returning to work after a disability-related leave of absence.		January 1, 2016

		<p>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>			
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>(Return to Work Process) (Job Task Analysis Form) Return to work and job task analysis will reflect requirements.</p>		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>This will be part of our checklist</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>Will review our current process to ensure that alternatives are available. Need to keep individual accommodation plan in mind</p>		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</p>	<p>Will review our current processes to ensure that alternatives are available.</p>		January 1, 2016

		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.	Need to keep individual accommodation plan in mind		
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.	Will review our current process to ensure that alternatives are available. Need to keep individual accommodation plan in mind		January 1, 2016

Part IV - Design of Public Spaces

Recreational trails/beach access routes				January 1, 2017
Outdoor eating areas (i.e. rest stops or picnic areas)				January 1, 2017
Outdoor play spaces (i.e. Playgrounds in provincial parks and local communities)				January 1, 2017
Outdoor paths of travel (i.e. sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals)		Need to review and determine applicability		January 1, 2017
Accessible parking (on and off street)		Review Section		January 1, 2017

Service-related elements (like service counters, fixed queuing lines and waiting areas)		January 1, 2017
Maintenance and restoration of public spaces	Review Section	January 1, 2017