

ACCESSIBILITY FOR ONTARIANS WITH DISABILITY ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – MULTI-YEAR PLAN

Part 1 -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.	WMG Accessible Customer Service Policy WMG IASR Policy	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.	HR Attended workshop Potential Barriers identified Plan Complete.	Complete	January 1, 2014
			HR receives and addresses requests concerning accessibility needs	Complete	January 1, 2014
			Scheduled 5Y review and Last Revision documented		
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		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.	<p>Training program developed</p> <p>Determine how many programs are needed for different groups of employees</p> <p>Determine who will deliver and how</p> <p>Determine when training will be delivered</p>	Complete	January 1, 2014
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Part II –INFORMATION AND COMMUNICATION 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 review of all feedback processes</p> <p>Consult with all departments</p> <p>Determine what accessible formats and communication options (verbal/written) will be available</p> <p>Ensure staff and management are aware that this needs to be available upon request (part of training program)</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.	Determine what accessible formats and communication options (verbal/written) will be available. Determine how long it will take to provide these formats (within 24 hours would be timely). Ensure staff know there will be no costs associated. (or charge reasonable costs to outsiders) WMG Integrated Accessibility Standard Regulation and WMG Customer Service Policy	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.	Ensure staff know how to offer/determine options (larger font, different colours, read it out loud, etc.,) WMG Training Program developed and available	Complete	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Post on website	Complete	January 1, 2016
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.	New web site is being developed and when launched in 2015, will comply with WCAG 2.0 Level A requirements Continuous improvements in technology and web services will aid in meeting legislated requirements by 2021	Complete	January 24, 2022

Part III –EMPLOYMENT STANDARDS

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.	Include statement in job ads that we will meet this requirement (internal and external). e.g. We are committed to providing accommodations for persons with disabilities. If you require accommodation we will work with you to meet your needs. Recruit in a variety of formats (electronic, resume's mailed in, etc.,) Internal and external posting template and job offer template updated to include an accessibility statement	Complete	January 1, 2016
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.	How will we notify applicants? Phone, writing, (remind them we have accommodation support). Include interview guidelines into training program for hiring managers. Are interview rooms accommodating? Do timelines take into account flexibility needs? If phone screening, set up time to do so – not right when you call – so they can prepare. WMG has scripts for communication for recruitment activities	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.	Add statement of such to offer letter.	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.	Circulate the policy. Create training program. Conduct training. WGMG Training Program developed and available	Complete	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.	Include in orientation.	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.	See 25 (1) WGMG IASR Policy	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.	Determine what information is required for them to do jobs (SOPs, job descriptions, work instructions, policies, SDSs, etc.) – what formats are they available in? What other information is provided – what formats are they available in. WGMG IASR Policy	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.	Train staff to have this conversation – courteous, helpful, professional, non-judgmental. Make sure they know what is available. WGM Training Program developed and available WGM IASR Policy	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.	Send reminder email or other communication to staff that if they need accommodation during workplace emergencies, they need to let a designated party know. WGM Disability Accessibility Request Form	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.	Obtain consent and respond in accordance with the obligations of consent WGM Disability Accessibility Request Form	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.	Be timely (within 24 hours) HR to follow developed Return to Work Program	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.	Ensure plan is communicated to new manager. Review as changes occur. WGM IASR Policy and Disability Accommodation Request Form	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.	Integrate into ESTRW process to these guidelines are met. WGM Disability Accommodation Request Form	Complete	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 and how accommodation can be achieved.	Integrate "The Accommodation Process" Individual employee accessibility work plan developed to include accommodation for employee and employer with respect to current legislation and recognized disabilities	Complete	January 1, 2016

		<p>28 (2) 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.</p>	See 28 (2) 1-3	Complete	January 1, 2016
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization, (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 (b) shall document the process.</p>	Integrated Return to Work Process	Complete	January 1, 2016
29		<p>29. (2) The return to work process shall, (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 (b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	<p>See 29 (1)</p> <p>WSIB return to work plan modified to accommodate accessibility requirements</p>	Complete	January 1, 2016

29		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.	WSIB return to work plan modified to accommodate accessibility requirements	Complete	January 1, 2016
30	Performance Management	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.	Our annual performance management process is assessable, both in written and oral formats as requested. For those employees with individual accommodation plan, assessable formats are available when communicating performance expectations (coaching, warnings, etc.)	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.	See 30 (1) Fulfilled through individual employee accessibility plan in accordance with WMG IASR Policy	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.	See 30 (1) Fulfilled through individual employee accessibility plan in accordance with WMG IASR Policy	Complete	January 1, 2016

Part IV –BUILT ENVIRONMENT

Section	Initiative	Description	Action	Status	Compliance Date
80				In progress	January 1, 2017

	<p>Meet the Accessibility Standards for the Design of Public Spaces when building or making modifications to public spaces</p>	<p>Public spaces applicable to our organization include: a) outdoor paths of travel such as sidewalks, ramps, stairs, curb ramps, off-street parking b) service related elements such as reception, waiting areas</p>	<p>Create policy that states newly constructed or redeveloped public spaces will meet the AODA Built Environment requirements. Ensure staff responsible for this understands and follows requirements.</p>		
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Scheduled Review (5Y-2027): Last Revision 01-2022