ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan for CCC employees based in Ontario

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance date/ Review 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.	Develop policy on Integrated Accessibility Standards.	Completed	January 1, 2014 April 2021
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. 	Updated January 31, 2014 Plan is posted on the website under "About Us". Plan to be reviewed every 2 to 5 years.	Plan to be regularly updated as progress is made.	January 1, 2014 April 2021
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 list of people that will require training by end of 2014. Ensure all new hires effective January 1, 2015 are trained.	All employees have been trained. All new employees are being trained in a timely manner.	January 1, 2015 April 2021

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date/ Review 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.	Review all feedback processes (internal and external) within the company. Ensure there are accessible features available where and when appropriate. Consider feedback that is confidential in this exercise. Determine what accessible formats and communication supports we will provide upon request.	Ongoing and to be determined on a case by case basis.	January 1, 2015 April 2021
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 alternate formats and communication supports will be made available to people upon request. Ensure they are made available in a timely manner, and at no additional cost to the person (eg. Same day, 24 hours).	Ongoing and to be determined on a case by case basis.	January 1, 2016 April 2021
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.	Develop a procedure for handling such requests.	Completed (The Accommodation Process)	January 1, 2016 April 2021
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Policy and Plan are posted on the website. Public notices (e.g. at entranceways or in meeting rooms) include such notification.	Completed	January 1, 2016 June 2021

Section	Initiative	Description	Action	Status	Compliance Date/Review Date
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.	Check with specific sites to understand any public safety procedures. Ensure they will be made in an accessible format – upon request.	Completed To be handled on a case by case basis.	January 1, 2012 April 2021
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.	 Have spoken to ITS about CCC's websites and need to be accessible. Meet deadline in 2021 for fully accessible website. Have purchased an IT Guide to website accessibility to provide guidance to ITS. 	Completed To be done Completed	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. April 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre- recorded).

PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date/ Review 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.	As of January 1, 2016, statement added to job offers, job postings and related documentation: "At CCC, we are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs."	Completed	January 1, 2016 April 2021
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. 	When position is advertised, applicants to be informed that accommodations are available. Assessment tools have been checked to ensure that alternate formats are available.	Completed Ongoing	January 1, 2016 April 2021
.4	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.	Appropriate message being put in new hire letters, effective January 1, 2016.	Completed	January 1, 2016 April 2021
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.	Customer Service Accessibility policy and Integrated Accessibility Standards policy have been distributed to all Ontario employees, are also found on the Public Folders and are posted on the website.	Completed	January 1, 2016 April 2021
			Determine the accommodation that is most suitable, upon request.	Case by case	
			Ensure that training is available in alternative formats, upon request.	As needed	

Section	Initiative	Description	Action	Status	Compliance Date/ Review Date
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Policy is provided to new employees as part of Orientation. Once a new hire requests communication in an alternative format, arrangements will be made for this as soon as possible.	As needed	January 1, 2016 April 2021
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.	If and when relevant policies are revised, they will be re-distributed to all employees.	As occurs	January 1, 2016 April 2021
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. 	Once an employee requests accommodation in the context of their work or company information, arrangements will be made for this as soon as possible.	As occurs	January 1, 2016 April 2021
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	This will be done when the employee makes the request.	As needed	January 1, 2016 April 2021

Section	Initiative	Description	Action	Status	Compliance Date/ Review Date
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.	Request for disclosure sent to all employees in order to manage emergency situations appropriately. Follow-up communications with employees have taken place. Where appropriate, individualized emergency plans have been developed.	Completed Completed	January 1, 2012 April 2021
			New hires are informed as part of Orientation process.	Ongoing	
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.	See 27 (1)		January 1, 2012 April 2021
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.	See 27 (1)		January 1, 2012 April 2021
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. 	See 27 (1)		January 1, 2012 April 2021

Section	Initiative	Description	Action	Status	Compliance Date/ Review Date
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.	See CCC Accommodation Process	Completed	January 1, 2016 April 2021
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. 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 employee's privacy. 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. 	See 28 (1)		January 1, 2016 April 2021

Section	Initiative	Description	Action	Status	Compliance Date/ Review Date
29	Return to Work Process	 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. 	Refer to CCC Return to Work procedures.	Completed	January 1, 2016 April 2021
29		 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. 	See 29 (1)	Completed	January 1, 2016 April 2021
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.	Agreed	No action	January 1, 2016 April 2021
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.	Once an employee requests accommodation, arrangements for performance reviews to be done in an alternative manner will be made as soon as possible.	As needed	January 1, 2016 April 2021

Section	Initiative	Description	Action	Status	Compliance Date/ Review Date
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.	Once an employee requests accommodation, it will be provided as soon as possible when the employee is provided with a development or advancement opportunity.	As needed	January 1, 2016 April 2021
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.	Once an employee requests accommodation, it will be provided as soon as possible when the employee is redeployed.	As needed	January 1, 2016 April 2021

PART IV – The Built Environment

Section	Initiative	Description	Action	Status	Compliance Date/ Review Date
33	General	 33.(1) An employer will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. These include ✓ outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps ✓ Accessible off-street parking 	Required changes will be made as modifications are made. Email sent to all Executives July 19, 2016 informing them of our obligations regarding public spaces, effective January 1, 2017.	To be done as changes are made to public spaces.	January 1, 2017 April 2021

Created April 2013/Updated October 6, 2014/Updated July 19, 2016/ Reviewed June 2021