

## AODA – Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR)

---

### Intent

CanACRE is committed to becoming fully accessible in Ontario by 2025. This accessibility plan outlines the policies and actions that CanACRE will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the [Integrated Accessibility Standards, Ontario Regulation 191/11](#).

### Statement of Commitment

CanACRE supports equal opportunity and is committed to providing a barrier-free environment that allows people to maintain their independence and dignity. CanACRE respects and upholds the requirements set forth under *the Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner.

### Multi-Year Accessibility Plan

CanACRE's accessibility plan is posted on its website ([www.canacre.com](http://www.canacre.com)) and will be provided in an accessible format upon request. CanACRE will review and update its accessibility plan at least once every five years.

## Part 1: General Requirements

Initiative	IASR Requirement	Action	Status	Compliance Date
1.1 Establishment of Accessibility policies	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"> <li>Publish AODA policies to CanACRE's website and internal HRIS system (ADP).</li> </ul>	Completed	January 1, 2014
1.2 Accessibility Plans	<p>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>	<ul style="list-style-type: none"> <li>Develop and publish multi-year accessibility plan to CanACRE's website &amp; internal HRIS system (ADP).</li> <li>In compliance with AODA requirements, Human Resources will regularly review and update the Accessibility Plan.</li> </ul>	Completed	January 1, 2014

Initiative	IASR Requirement	Action	Status	Compliance Date
	(c) review and update the accessibility plan at least once every five years.			
1.3 Training on IASR and the <i>Human Rights Code</i>	<p>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,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization 's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization</p>	<ul style="list-style-type: none"> <li>• Review current training to determine compliance with IASR requirements.</li> <li>• Administer AODA IASR &amp; Human Rights Code training through online module (HRDownloads) to new employees.</li> <li>• Maintain training logs through HRdownloads (online system).</li> <li>• Assess training needs at all levels (i.e. provide separate training for both managers and non-managers).</li> <li>• Training will be mandatory for all employees (full-time, part-time and "as needed").</li> <li>• Review the delivery of trainings and materials to incorporate accessible formats when required.</li> </ul>	Completed	January 1, 2015

## Part 2: Information and Communication Standards

Initiative	IASR Requirement	Action	Status	Compliance Date
2.1 Feedback Process	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.	<ul style="list-style-type: none"> <li>• Make employees aware of new IASR requirements by providing internal communications regarding new changes and processes for requests for accessible formats.</li> <li>• Develop an understanding of current accessible formats, information, communication and technology tools available at CanACRE to adequately respond to requests for accessible formats which take into consideration the requestor's disability needs.</li> </ul>	Completed	January 1, 2015
2.2 Accessible formats and communication supports	<p>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,</p> <p>(a) in a timely manner that takes into account the person's accessibility</p>	<ul style="list-style-type: none"> <li>• HR to review accessible formats, communication and technology supports currently available at CanACRE.</li> <li>• Develop and update process for requesting accessible formats—including providing alternative methods of feedback.</li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	needs due to disability; and  (b) at a cost that is no more than the regular cost charged to other persons.	<ul style="list-style-type: none"> <li>Develop a communication strategy for educating employees on the availability of and process for requesting accessible formats and communication supports.</li> </ul>		
	The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> <li>Understand the different accessible formats and communication supports available to assist with requests for accessible formats which take into account the individual's disability needs.</li> </ul>	Completed	January 1, 2016
	Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> <li>Incorporate language on the CanACRE website to advise that, in accordance with AODA, accessible formats may be made available on request.</li> </ul>	Completed	January 1, 2016
2.4 Accessible websites and web content	Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0,	<ul style="list-style-type: none"> <li>Conduct assessment on current web functionality to facilitate compliance and adequate accessibility features</li> <li>Communicate ISAR</li> </ul>	Completed	January 1, 2014

Initiative	IASR Requirement	Action	Status	Compliance Date
	initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	<p>requirements to web designers regarding existing and new web content</p> <ul style="list-style-type: none"> <li>Update the CanACRE website in accordance with WCAG 2.0 requirements.</li> </ul>		

### Part 3: Employment Standards

Initiative	IASR Requirement	Action	Status	Compliance Date
3.1 Recruitment, assessment and selection processes	<p>3.1.1 Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p> <p>3.1.2 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>3.1.3 If a selected applicant requests</p>	<ul style="list-style-type: none"> <li>Review all mechanisms for posting CanACRE positions (website, external posting agencies and campus postings).</li> <li>Incorporate language on postings and CanACRE career website to make applicants (internal/external) aware of AODA compliance requirements and to inform them that accommodation is available.</li> <li>Review recruitment process (tests, rooms, etc.) to eliminate barriers and provide accessible</li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	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.	features (upon request).		
3.2 Notice to successful applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<ul style="list-style-type: none"> <li>Incorporate CanACRE's accessibility policy into employment agreements.</li> </ul>	Completed	January 1, 2016
3.3 Informing employees of supports	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	<ul style="list-style-type: none"> <li>Develop communication strategy to educate and advise employees on CanACRE's accessibility policies and procedures.</li> </ul>	Completed	January 1, 2016
	Employers shall provide the information required under this section to new employees as soon as practicable after they begin their	<ul style="list-style-type: none"> <li>Accessibility policies and processes will be incorporated in the onboarding process for</li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	<p>employment</p> <p>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.</p>	<p>new Ontario employees.</p> <ul style="list-style-type: none"> <li>Develop processes and strategies to communicate policy changes through internal emails and internal HRIS system (ADP).</li> </ul>	Completed	January 1, 2016
3.4 Accessible formats and communication supports for employees	<p>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>	<ul style="list-style-type: none"> <li>Educate employees on the availability and process of requesting accessible formats and communication supports.</li> </ul>	Completed	January 1, 2016



Initiative	IASR Requirement	Action	Status	Compliance Date
3.5 Workplace emergency response information	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.	<ul style="list-style-type: none"> <li>Establish a process to provide employees who require accommodation to receive individualized workplace emergency response information.</li> </ul>	Completed	January 1, 2012
	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.	<ul style="list-style-type: none"> <li>CanACRE's process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the employee to share the information with those designated to provide assistance in the event of an emergency.</li> </ul>	Completed	January 1, 2012
	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	<ul style="list-style-type: none"> <li>Upon request, the Human Resources Department and their manager will work with the employee who requires accommodation, to provide an</li> </ul>	Completed	January 1, 2012

Initiative	IASR Requirement	Action	Status	Compliance Date
	<p>employee's disability.</p> <p>Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>Individual Workplace Emergency Response Plan.</p> <ul style="list-style-type: none"> <li>• CanACRE's process for creating Individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs.</li> </ul>	Completed	January 1, 2012
3.6 Documented individual accommodation plans	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.	<ul style="list-style-type: none"> <li>• Review of current accommodation processes and practices.</li> <li>• Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA</li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	<p>The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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 accommodation can be achieved and, if so, how accommodation can be achieved.</li> <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</li> </ol>	<ul style="list-style-type: none"> <li>• Create policy and procedures around the development of individual accommodation plans which outline:               <ul style="list-style-type: none"> <li>○ The circumstances medical is required (who and when requests are made).</li> <li>○ Accommodation Plans will incorporate confidentiality requirements and outline when, to whom and what information may be shared.</li> <li>○ Educate CanACRE employees on the Accessibility policies and processes and procedures for requesting individual plans.</li> <li>○ Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in</li> </ul> </li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	<p>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 information.</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>	<p>accordance with AODA.</p>		

Initiative	IASR Requirement	Action	Status	Compliance Date
3.7 Return to work process	<p>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>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 documented individual accommodation plans, as part of the process.</p>	<ul style="list-style-type: none"> <li>Develop and regularly update return to work process based on gaps and compliance requirements.</li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	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.			January 1, 2016
3.8 Performance management process	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.	<ul style="list-style-type: none"> <li>• Assess current performance review processes to make sure that accessibility features are incorporated.</li> <li>• Develop and update performance management processes which incorporate accessibility features.</li> <li>• Communicate awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation to people managers.</li> </ul>	Completed	January 1, 2016
3.9 Career development and advancement	An employer that provides career development and advancement to its employees shall take into account	<ul style="list-style-type: none"> <li>• Develop and regularly update training and professional development materials.</li> </ul>	Completed	January 1, 2016

Initiative	IASR Requirement	Action	Status	Compliance Date
	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.	<ul style="list-style-type: none"> <li>Promote processes for individual accommodation needs and plans in accordance with AODA.</li> <li>Track career progression of individuals with disabilities.</li> </ul>		
4.0 Redeployment	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.	<ul style="list-style-type: none"> <li>Develop and regularly review current transfer and redeployment practices and processes to make sure that accommodation plans are referenced</li> </ul>	Completed	January 1, 2016

If you have any questions, or have feedback related to this multi-year plan, related procedures or regarding how services are delivered to people with disabilities please contact Judy Miller, Human Resources Manager at [jmiller@canacre.com](mailto:jmiller@canacre.com) or 416-548-8602 ext. 2131.