## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

## INTEGRATED ACCESSIBILITY STANDARDS MULTI-YEAR PLAN: FOOD FOR TOTS



Updated June 2016

**PART I: General Requirements** 

| Section | Initiative                              | ISAR Requirement   | 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 referred to in this Regulation.   | Policy complete and posted on external website and intranet site for existing employees. Policy also provided in orientation packages for new hires. Alternate formats are available upon request.   | Completed   | January 1, 2014 |
| 4       | Accessibility Plans                     | <ul> <li>4.(1) Large organizations shall,</li> <li>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;</li> <li>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>c) review and update the accessibility plan at least once every five years</li> </ul>          | <ul> <li>AODA project team established to understand requirements of the IASR</li> <li>Ongoing meetings for AODA project team until all compliance deadlines have been met</li> <li>Plan will be updated accordingly as initiatives are completed; will be reviewed every 5 years</li> <li>Plan posted on website</li> </ul> | Completed   | January 1, 2014 |
| 7       | Training                                | <ul> <li>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 <i>Human Rights Code</i> as it pertains to persons with disabilities to,</li> <li>a) all employees, and volunteers;</li> <li>all persons who participate in developing the organization's policies; and</li> <li>all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul> | <ul> <li>Assessed training needs (e.g. separate training for managers/supervisors and employees)</li> <li>Determined training delivery method (e.g. online)</li> <li>Training of all staff is mandatory</li> <li>Completion of training is actively tracked</li> </ul>   | Completed for existing employees  Ongoing for new hires | January 1, 2015 |

## **PART II: Information and Communications Standards**

| Section | Initiative   | ISAR Requirement   | 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 the provision of accessible formats and communications supports, upon request.   | <ul> <li>Determined all current feedback surveys and<br/>mechanisms</li> <li>Feedback is available in accessible format<br/>upon request</li> </ul>   | Completed & ongoing | January 1, 2015 |
| 12      | Accessible Formats & Communication                               | <ul> <li>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,</li> <li>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</li> <li>b) at a cost that is no more than the regular cost charged to other persons.</li> </ul> | Communicated process for requesting accessible formats, including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual  This is also documented in the accessibility policy posted on our website | Completed           | January 1, 2016 |
|         | Supports   | 12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.  | Process in place for responding to, approving<br>or declining a request, to ensure suitability  | Completed           | January 1, 2016 |
|         |  | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.   | Incorporated language in marketing materials<br>and website to advise that, in accordance with<br>AODA, accessible formats may be made<br>available upon request  | Completed           | January 1, 2016 |
| 13      | Emergency<br>Procedure, Plans or<br>Public Safety<br>Information | 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.   | <ul> <li>Created an Emergency Response Plan which is provided to all employees and is accessible via the company intranet</li> <li>Emergency Response Plan is available in an accessible format upon request</li> </ul>                                   | Completed           | January 1, 2012 |

| Section | Initiative                           | ISAR Requirement  | Action  | Status      | Compliance Date  |
|---------|--------------------------------------|---|---|-------------|--|
| 14      | Accessible Websites<br>& Web Content | 14.(2) 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. | <ul> <li>Conducted an assessment of current web functionality to ensure compliance and availability of adequate accessibility features</li> <li>Ensure IT and Marketing teams are aware of ISAR requirements for existing web content effective January 2012; to work with Website Developers to introduce guidelines and roll-out/implement in phases</li> </ul> | In Progress | 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 Level AA, other than,  success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Pre-recorded) |

## **PART III: Employment Standards**

| Section | Initiative                                   | ISAR Requirement   | Action  | Status    | Compliance Date |
|---------|--|--|---|-----------|-----------------|
| 22      | Recruitment, General                         | Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.  | Incorporated language on postings and<br>website to make applicants aware that<br>accommodation is available upon request   | Completed | 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. | Incorporated language in all communications<br>to candidates (email, phone) that<br>accommodation is available upon request | Completed | January 1, 2016 |

| Section | Initiative   | ISAR Requirement   | Action   | Status              | Compliance Date |
|---------|--|--|--|---------------------|-----------------|
|         |  | 23.(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.  | If accommodation is required, the organization<br>will work with the applicant to ensure the<br>provision of a suitable accommodation                      | Completed & ongoing | January 1, 2016 |
| 24      | Notice to Successful<br>Applicants                                 | Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.   | Incorporated in offer letter a section regarding company's accessibility policies  | Completed           | January 1, 2016 |
| 25      |  | 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.   | Educated and advised employees on the company's accessibility policies, plan and processes   | Completed           | January 1, 2016 |
|         | Informing Employees of Supports                                    | 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.  | Accessibility policies and processes<br>incorporated in new employee onboarding<br>process and available on our intranet<br>whenever employees need access | Completed           | January 1, 2016 |
|         |  | 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.   | Employees are notified of any policy changes<br>by email and posting on company intranet   | Completed           | January 1, 2016 |
| 26      | Accessible Formats<br>& Communication<br>Supports for<br>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. | Process in place for employees requesting accessible formats and communication supports  | Completed           | January 1, 2016 |

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|         |                                      | 26.(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.  | Process in place for consulting with<br>employees to determine accommodation<br>needs  | Completed | January 1, 2016 |
| 27      |                                      | 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.                         | Internal process in place to provide individualized workplace emergency response information to employees with a disability upon request   | Completed | January 1, 2012 |
|         | Workplace                            | 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.                      | Process to provide individualized workplace<br>emergency response information to<br>employees with a disability includes<br>mechanism to obtain consent from employee<br>in order to share with those designated to<br>provide assistance in the event of an<br>emergency. | Completed | January 1, 2012 |
|         | Emergency<br>Response<br>Information | 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.   | Upon request, the organization will work with<br>the individual who requires accommodation, to<br>provide an individualized workplace<br>emergency response plan as soon as possible   | Completed | 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. | Policies provided to all new hires and existing<br>employees. Changes to the plans are<br>communicated as soon as practicable  | Completed | January 1, 2012 |

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|         |   | 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.   | Toolkit, templates, and process in place for<br>individual accommodation plans in<br>accordance with AODA | Completed | January 1, 2016 |
| 28      | Documented Individual Accommodation Plans | <ul> <li>28.(2) The process for the development of documented individual accommodation plans shall include the following elements:</li> <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 assist the employer in determining 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 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 information.</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</li> </ul> | Toolkit, templates, and process in place for individual accommodation plans in accordance with AODA       | Completed | January 1, 2016 |

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|         |                                     | into account the employee's accessibility needs due to disability.  |   |           |                 |
| 29      |                                     | <ul> <li>29.(1) Every employer, other than an employer that is a small organization,</li> <li>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</li> <li>b) shall document the process.</li> </ul> | Return to work process in place in accordance with AODA         | Completed | January 1, 2016 |
|         | Return to Work<br>Process           | <ul> <li>29.(2) The return to work process shall,</li> <li>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</li> <li>b) use documented individual accommodation plans, as described in section 28, as part of the process.</li> </ul> | Return to work process in place in accordance with AODA         | Completed | January 1, 2016 |
|         |                                     | 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.   | Return to work process in place in accordance<br>with AODA      | Completed | January 1, 2016 |
| 30      | Performance<br>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.   | Performance management process in place in accordance with AODA | Completed | January 1, 2016 |
| 31      | Career Development<br>& 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.  | Career development process in place in accordance with AODA     | Completed | January 1, 2016 |

| Section | Initiative   | ISAR Requirement   | Action  | Status    | Compliance Date |
|---------|--------------|--|---|-----------|-----------------|
| 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. | Redeployment process in place in accordance with AODA | Completed | January 1, 2016 |