

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, (AODA) 2005
Multi-Year Accessibility Plan to meet the Integrated Accessibility Standards Regulation (IASR)



Part I – GENERAL REQUIREMENTS

Legislative Standard	Description	Action	Status	Compliance Date
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.	Policy was reviewed, updated and re-posted to the website in March, 2024	Complete	January 1, 2014
	Large organizations shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	Reviewed and updated as part of the policy update in March 2024. Policies are posted online.	Complete	January 1, 2014
Accessibility Plans	<p>Large organizations shall,</p> <ul style="list-style-type: none"> 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. 	<p>Plan created and posted to website.</p> <p>Multi-year plan was reviewed and updated in May and July 2024 and posted to the website.</p>	Complete	January 1, 2014

Legislative Standard	Description	Action	Status	Compliance Date
Self-Serve Kiosks	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. Wesdome does not use self-service kiosks. April-June 2024 training: Included within training for awareness only should Wesdome use kiosks in the future.	Complete	January 1, 2014
Training	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, <ul style="list-style-type: none"> 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. 	Training provided to Ontario employees throughout March – June 2024 for existing workforce. <ul style="list-style-type: none"> • In-person for hourly workers • Online for employees with Wesdome issued emails • Tracking of training dates and names compiled for all Ontario employees as of June 2024 New employees will be trained as part of their orientation External contractors must meet the requirements which is embedded within the PO process.	In progress Complete Complete	January 1, 2015
Training	Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.	HR owns the policy and if updated/changed, employees will be notified and trained.	Complete	January 1, 2015 (ongoing thereafter)

Training	Every obligated organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the name of individuals to whom it is provided.	<p>Training records are kept via attendance sheets for in-person learning for hourly workers.</p> <p>Training records kept via online learning reports and certificates added to employee records for online learning.</p>	<p>Complete</p> <p>Complete</p>	January 1, 2015 (ongoing thereafter)
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PART II – Information and Communications Standards

Initiative	Description	Action	Status	Compliance Date
Feedback	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.	Feedback process developed and posted online with multiple formats: mail, telephone, email, fax, and address for in-person. Requests will be directed to Human Resources and handled on a case-by-case basis.	Complete Ongoing	January 1, 2015
Accessible Formats & Communication Supports	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.	Process developed. Requests will be directed to Human Resources and handled on a case-by-case basis.	Complete Ongoing	January 1, 2016
	The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Process developed Requests will be directed to Human Resources and handled on a case-by-case basis.	Complete Ongoing	January 1, 2016
	Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Posted online. Updated in April 2024 with policy updates.	Complete	January 1, 2016

Initiative	Description	Action	Status	Compliance Date
Emergency Procedures, Plans or Public Safety Info	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.	Should emergency plans be available to the public and if requested, they will be provided in an accessible format. Current Ontario site is located away from communities.	Complete	January 1, 2012
Accessible Websites & Web Content	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.	Requirements included with web design company and part of ongoing requirements for any updates/new development.	Complete Ongoing when new standards developed or with web updates	<p>January 1,2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level</p> <p>January 1,2021 All internet websites and web content must conform with WCAG 2.0 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).

PART III – Employment Standard

Initiative	Description	Action	Status	Compliance Date
Recruitment – General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Recruitment processes modified to consider accessibility for applicants with disabilities. Candidates are informed of availability of accommodations on job postings. Updated March 2024.	Complete	January 1, 2016
Recruitment, Assessment or Selection Process	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. 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.	Candidates are informed of this option as part of the recruitment process during the screening call in preparation for an assessment or selection interview. Updated March 2024.	Complete	January 1, 2016
Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Successful applicants are informed within offer letters and during onboarding through policy review. Updated March 2024.	Complete	January 1, 2016
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 needs due to disability.	Employees review accessibility policies during onboarding. Updated March 2024.	Ongoing as part of current AODA project	January 1, 2016

Initiative	Description	Action	Status	Compliance Date
	Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<p>Mandatory Accessibility for Ontarians with Disabilities (AODA) training is completed by all new employees as part of onboarding process.</p> <p>Name of employee and date of training are recorded.</p> <p>Online assignment for employees with WDO issued emails.</p> <p>In-person for hourly employees at ERM.</p>	<p>Complete</p> <p>Ongoing</p>	January 1, 2016
	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>HR is accountable to determine training for employees re: changes to the accessibility policies</p> <p>HR will determine the need and organize training based on changes.</p>	<p>Complete</p> <p>Ongoing</p>	January 1, 2016
Accessible Formats & 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>	Process: requests from the employee's manager will be directed to Human Resources and handled on a case-by-case basis.	Complete	January 1, 2016

	The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Process: requests from the employee's manager to be directed to Human Resources and handled on a case-by-case basis.	Complete	January 1, 2016
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Initiative	Description	Action	Status	Compliance Date
Workplace Emergency Response Information	<p>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.</p> <p>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.</p> <p>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.</p>	Accommodation request from an employee with a disability assesses individual workplace emergency response plan with the employee's input and consent as part of the process. Human Resources supports this process.	Complete	January 1, 2012
	<p>Every employer shall review the individualized workplace emergency response information,</p> <ul style="list-style-type: none"> 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. 	Individual workplace emergency response plans are kept within the employee's file.	Complete	January 1, 2012

Initiative	Description	Action	Status	Compliance Date
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.	Accommodation process is under review and will be saved within the Human Resource files. (July 2024)	In progress	January 1, 2016
	<p>The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 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 4. employer's expense, to determine if and how accommodation can be achieved. 5. 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. 6. The steps taken to protect the privacy of the employee's personal information. 7. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 8. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 9. The means of providing the individual accommodation plan in a format that takes into 	Accommodation process is under review and will be saved within the Human Resource files. (July 2024)	In progress	January 1, 2016

	account the employee's accessibility needs due to disability.			
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	<p>Individual accommodation plans shall,</p> <ul style="list-style-type: none"> a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; b) if required, include individualized workplace emergency response information, as described in section 27; and c) identify any other accommodation that is to be provided. 	<p>Accommodation process is under review and will be saved within the Human Resource files. (July 2024)</p>	<p>In progress</p>	<p>January 1, 2016</p>
<p>Return to Work Process</p>	<p>Every employer, other than an employer that is a small organization,</p> <ul style="list-style-type: none"> 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>Accommodation process is under review and will be saved within the Human Resource files. (July 2024)</p>	<p>In progress</p>	<p>January 1, 2016</p>
	<p>The return to work process shall,</p> <ul style="list-style-type: none"> 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>Accommodation process is under review and will be saved within the Human Resource files. (July 2024)</p>	<p>In progress</p>	<p>January 1, 2016</p>

	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.	Process will be updated as needed to keep current and aligned with provincial laws.	Ongoing	January 1, 2016
Performance Management	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.	Managed on a case-by-case basis.	Ongoing	January 1, 2016
Career Development & Advancement	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.	Managed on a case-by-case basis.	Complete	January 1, 2016
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.	Managed on a case-by-case basis.	Complete	January 1, 2016

POLICY TYPE
Human Resources

LAST REVIEWED AND APPROVED
May 2024

Version	Date	Author	Description	Comments
1.0	YYYY-MM-DD	Wesdome	Initial draft	
1.1	2024-05-02	A. Fitzpatrick	Major revision	Amended to clarify new actions and training plan
1.2	2024-07-05	A. Fitzpatrick	Amended to update actions	Accommodation process under review