

Integrated  
Accessibility  
Standards  
Regulations –  
Multi Year Plan

# AODA, 2005

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Prepared By: Human Resources, and available on DLL's website (<http://www.dllgroup.com/ca/accessibility>). This document is available in an accessible format upon request.



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## **Introduction**

DLL is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

The following plan has been established by De Lage Landen Financial Services Canada Inc. (“**DLL**”) to govern the provision of services in accordance with Regulation 191/11, “Integrated Accessibility Standards” (“**Regulation**”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**Act**”). These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

DLL has developed and will maintain and document an Accessibility Plan outlining DLL’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on DLL’s website. Upon request, DLL will provide a copy of the Accessibility Plan in an accessible format.

## **Integrated Accessibility Standards Regulation(IASR) Requirements**

- General Requirements
  - Policies
  - Multi-year Accessibility Plan
  - Self-Serviced Kiosks
  - Education and Training
  
- Information and Communication Standards
  - Feedback, Accessibility Formats and Communication Supports
  - Emergency Procedures, Plans or Public Safety Information
  - Accessible Websites and Web Content
  
- Employment Standards

- Recruitment – general, assessment and selection process, notice to successful applicants
- Informing Members of Accessible Formats and Communication Supports
- Documented Individual Accommodation Plans, and Return to Work Process
- Performance Management, Career Development and Redeployment

In accordance with the requirements set out in the IASR, DLL will:

1. Establish, review and update this plan to meet the above criteria;
2. Post this plan on our website;
3. Report as required on its website on the progress of the implementation of this plan;
4. Provide this plan in an accessible format, upon request; and
5. Review and update this plan at least once every five years.

### **DLL Accessibility Statement**

***“We are an accessible organization. This document/information is available in accessible formats upon request.”***

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

### Definitions:

The following defined words shall have the meanings attributed to them:

“**barrier**” as defined in the *Accessibility for Ontarians with Disabilities Act, 2005*, means anything that prevents a Person with a Disability from fully participating in all aspects of society because of his or her Disability, including a physical barrier, an architectural barrier, an information or communication barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

“**disability**” defined by the *Accessibility for Ontarians with Disabilities Act, 2005* and the *Ontario Human Rights Code*, is:

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect, or illness and, without limiting the generality of the foregoing, include diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- (b) a condition of mental impairment or a developmental disability;
- (c) a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (d) a mental disorder; or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the **Workplace Safety and Insurance Act, 1997**.

“**members**” means every person who may deal with the public or other third parties on behalf of DLL, whether the person does so as an employee, contractor, volunteer or otherwise.

“**accessible formats**” may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities; (“format accessible”)

“**communication supports**” may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language and other supports that facilitate effective communications.



“**large organization**” means an obligated organization with 50 or more employees in Ontario, other than the Government of Ontario, the Legislative Assembly or a designated public sector organization.

“**obligated organization**” means the Government of Ontario, the Legislative Assembly, a designated public sector organization, a large organization and a small organization to which the standards in the Regulation apply.

## INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

### Part I – 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.	Draft policy for approval  Approval Complete  Post Externally(website-contact Corp IT) & Internally(HR Sharepoint), as well as hardcopy at front reception	July 2013  Nov 2013  Dec 2013	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.	a) Draft plan for approval  Approval Complete  Conduct external & internal office audit to identify barriers. Determine audit support options (external consultant or health & safety committee with facilities mgr)  b) Post Externally(website-contact Corp IT) & Internally(HR Sharepoint), as well as hardcopy at front reception  c) Add to HR & Legal calendar a reminder to review this plan	Oct 2013  Nov 2013  Nov 2013  Dec 2013  Dec 2013	January 1, 2014
6	Self-Serve	6.(2) Large organizations and small	Does not apply to DLL		January 1, 2014

	Kiosks	organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.			
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, <ul style="list-style-type: none"> <li>(a) all employees, and volunteers;</li> <li>(b) all persons who participate in developing the organization's policies; and</li> <li>(c) all other persons who provide goods, services or facilities on behalf of the organization.</li> </ul>	<p>Determine method and levels of training required to members.</p> <p>Create a schedule of whom and when the training will occur. Roll out company wide</p> <p>Contact external vendor (Prolearning) &amp; review their training program for members and mgmt use</p> <p>Maintain a record of all completed training.</p>	<p>Dec 2013</p> <p>April 2014 – Oct 2014</p> <p>Dec 2013</p> <p>Dec 2014</p>	January 1, 2015



**PART II – Information and Communications 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>Review existing processes for receiving and responding to feedback are accessible. Consult with operational areas on current processes.</p> <p>Determine &amp; document what the accessible formats may be requested, and add accessibility statement to the necessary documentation or information</p>	<p>April 2014</p> <p>July 2014</p>	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 & document what the accessible formats may be requested, and add accessibility statement to the necessary documentation or information	July 2014	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.	Document and train members to consult with the person making the request to determine suitability of the accessible format or	Dec 2014	January 1, 2016

			communicate support		
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Identify all communication methods (connect with marketing and operations teams) to the public and add accessibility statement to the necessary documentation or information	Dec 2014	January 1, 2016
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.	Does not apply		January 1, 2012
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.	Consult with corporate IT dept of the upcoming compliance deadlines  Research guidelines and support vendors on website accessibility  Perform audit on our current website to assess compliance level, using achecker.ca	Jan 2013, ongoing  Ongoing  Aug 2013	<b>January 1, 2014</b> New internet websites and web content on those sites must conform with WCAG 2.0 Level A.

			<p>**Send local IT professional to an accessibility workshop –check with prolearning vendor availability</p> <p>Partner with local or corporate IT and Marketing to ensure all notices and documents are readily available in alternate accessible formats</p>	<p>Sept 2014</p> <p>July 2014, ongoing</p>	<p><b>January 1, 2021</b></p> <p>All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>
15-18	<p>Educational &amp; Training Resources &amp; Materials;            Training to Educators;            Producers of Educational or Training Material;            Libraries of educational &amp;</p>		<p>Sections 15-18 do not apply to DLL</p>		<p>January 1, 2013</p> <p>January 1, 2013</p> <p>January 1, 2015</p> <p>January 1, 2015</p>

	training institutions				
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**PART III – Employment Standard**

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.	<p>**Review, and if necessary modify recruitment policies, procedures and processes</p> <p>Post accessibility statement as means to communicate the availability of accommodation. Statement to be used on all recruitment information &amp; documentation</p>	<p>Oct 2013, Ongoing</p> <p>Oct 2013, ongoing</p>	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>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.</p> <p>(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.</p>	<p>1) Review, and if necessary modify recruitment policies, procedures and processes</p> <p>Document and communicate a recruitment accessibility script for the interviewer to aid in the scheduling of an interview and or assessment for applicants</p> <p>2) Determine typical accommodations that could be made. Document and train recruitment members and managers on how to consult with an applicant and how to arrange suitable individual accommodations that is or are reasonable to the organization</p>	<p>Oct 2013, ongoing</p> <p>Dec 2014</p> <p>Dec 2014</p>	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.	<p>**Review, and if necessary modify recruitment policies, procedures and processes</p> <p>Update the offer of employment letter to notify candidates of accommodation processed are in place upon hire and throughout their employment. Also include a verbal script for when verbal offers are made in advance of paper letters  **could attach the IASR DLL policy to offer of employment letter</p>	<p>Oct 2013</p> <p>Dec 2014</p>	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.	<p>Communicate with current and new members of all the AODA policies, procedures and processes. Done via email, or during orientation period, and on the HR sharepoint, etc... Members will be also communicated via the same methods as noted above when updates or changes to existing policies are made. Accommodations to this format of communication will be made to members upon request</p> <p>Document and train managers on how to consult with a member who requires an individual</p>	<p>Dec 2013, ongoing</p> <p>Dec 2014 Ongoing</p>	

			accommodation that is or are reasonable to the organization **Accessibility statement shall be added to all documents issued to members		
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	See 25 (1) above		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) above		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 and document what the accessible formats may be requested  Document and train managers on how to consult with a member who requires an individual accommodation that is or are reasonable to the organization  Identify all communication methods to members and add accessibility statement to the necessary documentation or information	April 2014, ongoing	January 1, 2016

26		(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	See 26 (1) above		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.	<p>**Review, and if necessary modify workplace emergency response policies, procedures and processes. Work in conjunction with the Health &amp; Safety Committee.</p> <p>Communicate with current and new members of workplace emergency response information. Done via email, or during orientation period, and on the HR Sharepoint, etc... Members will be also communicated via the same methods as noted above when updates or changes to existing policies are made.</p> <p>**Accessibility statement shall be added to all documents issued to members</p> <p>Accommodations to this format of communication will be made to members upon request</p>	<p>To be updated since in new building</p> <p>Ongoing</p>	January 1, 2012
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the	Document and train managers on how to consult with a member in a confidential manner who requires an individualized emergency plan	Ongoing	January 1, 2012



		employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Develop, document and communicate a form that captures the individualized workplace emergency response information, with sign off authority to share information to members providing the support during those times		
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 Section 27 (1) above		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.	See Section 27 (1) above	Ongoing	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	**Review, and if necessary modify information related to documented individual accommodation plans, policies, procedures and processes	June/July 2014 Ongoing	January 1, 2016

		disabilities.	Communicate with current and new members of the process for documented individual accommodation plans. Done via email, or during orientation period, and on the HR Sharepoint, etc... Members will be also communicated via the same methods as noted above when updates or changes to existing policies are made. Accommodations to this format of communication will be made to members upon request		
28		<p>(2) 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 and how accommodation can be achieved.</li> <li>4. The manner in which the employee can request the participation of a representative from their bargaining</li> </ol>		Ongoing	January 1, 2016

		<p>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.</p> <ol style="list-style-type: none"> <li>5. The steps taken to protect the privacy of the employee's personal.</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 into account the employee's accessibility needs due to disability.</li> </ol>			
29	Return to Work Process	<p>29.(1) 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>**Review, and if necessary modify return to work policies, procedures and processes</p> <p>Communicate with current and new members of the return to work process. Done via email, or during orientation period, and on the HR Sharepoint, etc... Members will be also communicated via the same</p>	Ongoing	January 1, 2016

		(b) shall document the process.	methods as noted above when updates or changes to existing policies are made. Accommodations to this format of communication will be made to a member upon request		
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.		Ongoing	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.		Ongoing	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.	**Accessibility statement shall be added to all documents issued to members Accommodations to this format of communication will be made to members upon request	Ongoing	January 1, 2016
31	Career Development &	31.(1) An employer that provides career development and advancement to its	Take into acct the communication to accommodate their needs. E.g.	Ongoing	January 1, 2016

	Advancement	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.	Posting, description, new team lead needs individual plan		
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.	<p>*Review, and if necessary modify return to work policies, procedures and processes</p> <p>Document and train managers on how to consult with a member who are being deployed from the organization in a confidential manner</p>	Ongoing	January 1, 2016

**For more information, please contact Human Resources**

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