

Accessibility for Ontarians with Disabilities Act, 2005 Integrated Accessibility Standards – Multi Year Plan

Part I – General Requirements

AODA Regulation			CATC Action Plan	
Section	Initiative	Regulation	Action	Status
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 drafted and approved December 2012 Policy reviewed December 2017.	Completed
4	Accessibility Plans	4. (1) The Government of Ontario, Legislative Assembly, designated public sector organizations and large organizations shall, <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. 	Create an AODA working group. AODA working group to meet regularly to review the progress of the plan. AODA working group to review plan January each year.	Completed Ongoing Ongoing

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,	Ensure all employees complete AODA training through HRDownloads	Complete
		<ul style="list-style-type: none"> (a) all persons who are an employee of, or a volunteer with, the organization; (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. 	Ensure employees complete refresher training annually.	Ongoing

Part II – Information and Communication Standards

AODA Regulation			CATC Action Plan	
Section	Initiative	Regulation	Action	Status
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.	Conduct review of all internal and external feedback processes for all CATC affiliated brands.	Complete
			Create a feedback procedure for each organization.	Complete
			Ensure employees and management are aware of the AODA feedback procedure.	Ongoing
12	Accessible Formats and	12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the	Determine what accessible formats and	Ongoing

	Communication Supports	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.	communication supports we will provide upon request. Develop process to ensure these formats and supports can be provided in a timely manner.	Ongoing
12	Accessible Formats and Communication 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.	Ensure employees and management are aware of the consultation requirement.	Upcoming
12	Accessible Formats and Communication Supports	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Include language related to accessible formats in the Accessible Customer Service Policy. Identify and implement alternate notification methods.	Complete Ongoing
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.	Assess existing emergency procedures.	In progress
14	Accessible Website & Web Content	(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web	Assess existing websites for accessibility	In progress

		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.	Continuously review WCAG guidelines to be informed of changes and updates.	
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Part III – Employment Standards

AODA Regulation			CATC Action Plan	
Section	Initiative	Regulation	Action	Status
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.	Determine best methods of internal and external communication of availability of accommodation upon request. Include accessibility language in job postings.	Ongoing Ongoing
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.	Include accessibility language in job postings. Create a process to ensure timely provision of suitable accommodation.	Completed Ongoing
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.	Review offer letters for all affiliate brands to ensure that they incorporate our commitment to accessibility and	In Progress

			accommodation for employees with disabilities.	
25	Informing Employees of Supports	<p>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> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>(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.</p>	<p>Identify best method for informing employees of commitment to providing accommodations, and implement communication.</p> <p>Include accessibility commitment in new hire onboarding package.</p> <p>Develop and implement a process to notify employees of policy changes.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
26	Accessible Formats & Communication Supports for Employees	<p>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,</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> <p>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Determine what is already available in accessible formats and what needs to be adapted upon request.</p> <p>Establish a consultation process to determine what the employee will require.</p>	<p>Ongoing</p> <p>Upcoming</p>

<p>27</p>	<p>Workplace Emergency Response Information</p>	<p>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> <p>(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.</p> <p>(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.</p> <p>(4) 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>As part of existing Emergency Response plans, employees will receive an additional form that indicates any assistance required.</p>	<p>In progress.</p>
<p>28</p>	<p>Documented individual Accommodation Plans</p>	<p>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.</p>	<p>Develop a process for recruitment.</p>	<p>Reviewing current practices and processes.</p>

28	Documented individual Accommodation Plans	<p>(2) 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 employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, 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 the privacy of the employee's personal information. 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. 	Review current practices and develop a formalized process.	Reviewing current practices and processes.
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28	Documented individual Accommodation Plans	(3) Individual accommodation plans shall, (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.	Review current practices and develop a formalized process.	Reviewing current practices and processes.
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. (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 documented individual accommodation plans, as described in section 28, as part of the process.	Review current process for employees return to work after a disability related leave of absence.	In progress
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.	Review current processes for providing performance feedback. Update policies/processes where needed to ensure accessibility needs can be met and individual accommodation plans are considered.	Reviewing current policies/processes.
31	Career Development and	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	Review current processes for providing career development and	Reviewing current policies/processes.

	Advancement	any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	<p>advancement.</p> <p>Update policies/processes where needed to ensure accessibility needs can be met and individual accommodation plans are considered.</p>	
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 current redeployment practices.</p> <p>Update policies/processes where needed to ensure accessibility needs can be met and individual accommodation plans are considered.</p>	Reviewing current policies/processes