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Integrated Accessibility Standards Multi Year Plan (AODA Ontario)

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

PART 1 – GENERAL REQUIREMENTS

Accessibility Policy

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

Action	Status	Compliance Date
Draft policy and submit to management for approval. Policy to be communicated to employees.	Complete	January 1, 2014

Accessibility Plans

4 (1) Large organizations shall,

- 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;
- Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and
- Review and update the accessibility plan at least once every five years.

Action	Status	Compliance Date
Develop a multi-year accessibility plan outlining strategy	Complete	January 1, 2014
Post accessibility plan on website	Complete	January 1, 2015
Review accessibility plans as per the Act	Ongoing	Every 5 Years

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,

- All employees, and volunteers;
- All persons who participate in developing the organization's policies; and
- All other persons who provide goods, services or facilities on behalf of the organization.

Action	Status	Compliance Date
Provide Human Rights Code training	Ongoing	January 1, 2015
Provide Accessibility Standards training	Ongoing	January 1, 2015

PART II – INFORMATION AND COMMUNICATIONS STANDARDS

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.

Action	Status	Compliance Date
Ensure contact information available on website for feedback (external)	Complete	January 1, 2015
Ensure staff are made aware of process how to request for accommodation if needed (internal)	Complete	January 1, 2015
Determine what accessible formats and communication supports we will provide upon request.	In compliance-Ongoing	

Accessible Formats and 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.

Action	Status	Compliance Date
Determine what accessible formats and communication supports to be provided to persons with disabilities upon request in a timely manner	In compliance-Ongoing	January 1, 2016

12 (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.

Action	Status	Compliance Date
Communicate to staff of this requirement through training.	In compliance-Ongoing	January 1, 2016

12 (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.

Action	Status	Compliance Date
Post on website (included in Policy)	Completed	January 1, 2015

Website

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.

Action	Status	Compliance Date
Ensure website conforms with WCAG 2.0 Level A	Compliant	January 1, 2015
Ensure website conforms with WCAG 2.0 Level AA	Compliant	January 1, 2021
Continuously review WCAG 2.0 guidelines to remain informed of changes and updates.	Ongoing	Ongoing

PART III – EMPLOYMENT STANDARD

Employment

22 Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

Action	Status	Compliance Date
Include a statement in job posting template stating HPA's commitment in providing accommodations for persons with disabilities.	In compliance- Ongoing	January 1, 2016

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.

Action	Status	Compliance Date
Ensure recruitment process includes steps to notify applicants that accommodations are available upon request.	Complete	January 1, 2016

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

Action	Status	Compliance Date
Identify barriers: location of interview room, room set up for in person interviews, interviewing timelines, supports, paperwork, etc.	In compliance- Ongoing	January 1, 2016

24 Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.

Action	Status	Compliance Date
Include statement in hire letter/agreement template.	In compliance-Ongoing	January 1, 2016

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.

Action	Status	Compliance Date
Circulate policy, training, and staff announcements	Complete	January 1, 2016

25 (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.

Action	Status	Compliance Date
Include information in new hire orientation process	In compliance-Ongoing	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.

Action	Status	Compliance Date
Ensure any changes to policies are communicated to employees	In compliance-Ongoing	January 1, 2016

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.

Action	Status	Compliance Date
Ensure employees are aware that accessible formats can be made available upon request.	In compliance-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.

Action	Status	Compliance Date
Ensure accessible formats and communication are provided to employee based on disability requirements	In compliance-Ongoing	January 1, 2016

Emergency Response

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.

Action	Status	Compliance Date
Provide individualized workplace emergency response when accommodation is required.	In compliance-Ongoing	January 1, 2012

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.

Action	Status	Compliance Date
Provide information to the designated person upon employee consent.	In compliance-Ongoing	January 1, 2012

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.

Action	Status	Compliance Date
Ensure information is provided to employee as soon possible after becoming aware of disability.	In compliance-Ongoing	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.

Action	Status	Compliance Date
Review to be conducted when required as per the section of the Act above.	In compliance-Ongoing	January 1, 2012

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.

Action	Status	Compliance Date
Develop a written Workplace Accommodations Plan.	Complete	January 1, 2016

28 (2) The process for the development of documented individual accommodation plans shall include the following elements:

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 determine if and 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.
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.

Action	Status	Compliance Date
Develop Workplace Accommodation Plan to include the above elements.	Complete	January 1, 2016

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.

Action	Status	Compliance Date
Review Return To Work Program/Duty to Accommodate in Handbook and make changes as required.	Complete	January 1, 2016

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.

Action	Status	Compliance Date
Review process and make changes as needed.	Complete	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.

Action	Status	Compliance Date
Review and make policy/employee handbook changes as needed to indicate above.	Complete	January 1, 2016

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.

Action	Status	Compliance Date
Review current process keeping individual accessibility needs or accommodation plans mind.	In compliance- Ongoing	January 1, 2016

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.

Action	Status	Compliance Date
Review current process keeping individual accessibility or accommodation plans in mind.	In compliance- Ongoing	January 1, 2016

PART III – Built Standard

Customer Service Accessibility

33 Every employer shall ensure compliance with the built standards required meaning any renovation completed from 2017 onward ensures accessibility.

Action	Status	Compliance Date
Customer service desk height accommodates persons with disabilities / using mobility devices.	Complete	December 31, 2023

