

PART I – GENERAL REQUIREMENTS

Initiative	Section	Description	Ownership	Action	Status	Compliance Date
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.	AODA Team		COMPLETE	1-Jan-14
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.	AODA Team	Work with Marketing Department	COMPLETE	1-Jan-14
				AODA work team to review on an annual basis	ONGOING	
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, (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.	AODA Team	Employees trained through 24/7 system New hires complete within 3 months of start date. Includes contractors and 3rd party	COMPLETE ONGOING	 1-Jan-15

PART II – INFORMATION AND COMMUNICATIONS STANDARDS

Initiative	Section	Description	Ownership	Action	Status	Compliance Date
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.	AODA Team	Established process for feedback (included in AODA Policy). Conduct a review of all informal processes and Determine what accessible formats and communication supports we will provide upon request 24/7 Training covers the need to accommodate	ONGOING	1-Jan-15
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.	AODA Team	Determine what accessible formats and communication supports we will provide upon request and in a timely manner to persons with disabilities.	ONGOING	1-Jan-16
				Source providers in each region 24/7 Training covers the need to accommodate		
				As per Samuel's AODA Policy the branch contact and Safety Team member will work with the person making the request to determine a suitable format or communication support.		
		(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	AODA Team Branch Rep			
		(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	AODA Team	Addressed in Samuel's AODA policy - web accessible		
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 practical, upon request.		Not made public - but plan is communicated to employees and visitors.	ONGOING	1-Jan-12

Initiative		Description	Ownership	Action	Status	Compliance Date
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.	AODA Team Marketing Department	Work with Marketing team to ensure new websites are in compliance with WCAG 2.0	PENDING	1-Jan-14 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.
				Work with Marketing team to ensure all websites are in compliance with WCAG 2.0.		1-Jan-21 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).
				Review WCAG guidelines to remain compliant		

PART III – EMPLOYMENT STANDARD

Initiative		Description	Ownership	Action	Status	Compliance Date
Recruitment - General	22	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	HR	Statement on website - Recruitment Tab Statement on all internal & external job postings	PENDING	1-Jan-16
Recruitment, Assessment or Selection Process	23	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.	HR	Include statement in interview/screening confirmation emails about accommodation	PENDING	1-Jan-16
		(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.		Identify potential barriers in process		
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.	HR	Include policy statement in all offer letters	PENDING	1-Jan-16
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.	HR	Include in new hire package/orientation	PENDING	1-Jan-16
		(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.		Include in new hire package/orientation		
		(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.		Updated policy posted on Torch and in public spaces/bulletin boards		

Initiative		Description		Action	Status	Compliance Date
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.	HR	Where appropriate, work with the employee to conduct a review of the functional area to determine specific Information required and available. Develop process to support	PENDING	1-Jan-16
		(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.		Identify communication supports available		
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.	AODA Team EH&S	Process in place	COMPLETED	1-Jan-12
		(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.				
		(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.				
		(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.				
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 disabilities.	HR	HR to develop process and related documentation	PENDING	1-Jan-16
		(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.						

Initiative		Description		Action	Status	Compliance Date
Return to Work Process	29	<p>(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.</p> <p>(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.</p> <p>(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.</p>	AODA Team HR EH&S	Review RTW Plan with EH&S to ensure compliance and inclusion of a statement of accommodation	PENDING	1-Jan-16
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.	HR	All current process/future processes/process changes will be vetted against Individual Accommodation plans to ensure the plans takes the accommodation requirements into account.	PENDING	1-Jan-16
Career Development & 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.	HR	All current process/future processes/process changes will be vetted against Individual Accommodation plans to ensure the plans takes the accommodation requirements into account.	PENDING	1-Jan-16
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.	HR	All current process/future processes/process changes will be vetted against Individual Accommodation plans to ensure the plans takes the accommodation requirements into account.	PENDING	1-Jan-02