

# ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES

## MULTI-YEAR ACCESSIBILITY PLAN

The Integrated Accessibility Standards Regulation, 191/11 requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website. In accordance with the IASR, Turn Key Staffing's Multi-Year accessibility plan outlines Turn Key Staffing's comprehensive strategy to prevent and remove barriers to accessibility.

This multi-year plan outlines Turn Key Staffing's strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in Turn Key Staffing's Accessibility Policies. The plan will be reviewed and updated once every five years and is available in alternate accessible formats upon request.

We are committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause Turn Key Staffing undue hardship.

### Part 1: General Requirements

Initiative	ISAR Requirement	Action	Status	Compliance Date
<b>1.1 Establishment of Accessibility Policies</b>	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 complete and posted on Turn Key Staffing external website and intranet	Complete	January 1, 2014
<b>1.2 Accessibility Plans</b>	Large organizations shall, <ul style="list-style-type: none"> <li>• establish, implement, maintain and document a multi-year</li> </ul>	<ul style="list-style-type: none"> <li>• Designated persons attended an AODA Seminar outlining requirements of the IASR</li> <li>• Management</li> </ul>	Complete	January 1, 2014

	<p>accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <ul style="list-style-type: none"> <li>• post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</li> <li>• review and update the accessibility plan at least once every five years.</li> </ul>	<p>team to review process and identify and remove barriers to meet regulation requirements</p> <ul style="list-style-type: none"> <li>• Designate an employee responsible for reviewing the plan on an on-going basis to ensure compliance deadlines have been met</li> </ul>		
<b>1.3 Training</b>	<p>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,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p>	<ul style="list-style-type: none"> <li>• Reviewed current training to determine whether existing training could be leveraged for training required by the IASR</li> <li>• Assess training needs (e.g., separate training for managers and employee levels)</li> <li>• Determine vehicle to deliver training (e.g., online or in person)</li> <li>• Training will be</li> </ul>	Complete	January 1, 2015

	(c) all other persons who provide goods, services or facilities on behalf of the organization.	<p>mandatory</p> <ul style="list-style-type: none"> <li>• Training to incorporate accessible format – review training and materials to determine what accessible formats currently exist and what accessible functions may be incorporated in the training design</li> </ul>		
--	--	--	--	--

**Part 2: Information and Communications Standards**

<b>Initiative</b>	<b>ISAR Requirement</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>
<b>2.1 Feedback</b>	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.	<ul style="list-style-type: none"> <li>• Determine all current feedback mechanisms</li> <li>• As needed, update current process for requesting accessible formats – including alternative methods of feedback</li> </ul>	Complete	January 1, 2015

<b>2.2 Accessible Formats &amp; Communication Supports</b>	2.2.1 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.	<ul style="list-style-type: none"> <li>• The management team shall review materials (eg. Marketing material) requiring accessible formats and communication supports</li> <li>• Conduct assessment/ review processes to ensure accessible formats are available for materials</li> <li>• Communicate strategy for educating employees on the availability of and process for requesting accessible formats and communication supports</li> </ul>	Complete	January 1, 2016
	2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Develop a process for responding to, approving or declining a request	Complete	January 1, 2016
	2.2.3 Every obligated organization shall notify the public	<ul style="list-style-type: none"> <li>• Incorporate language in marketing materials and</li> </ul>	Complete	January 1, 2016

	about the availability of accessible formats and communication supports.	website to advise that, in accordance with AODA, accessible format may be made available on request		
<b>2.3 Accessible Websites &amp; Web Content</b>	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.	<ul style="list-style-type: none"> <li>• A new website is currently under development.</li> <li>• Ensure that the vendor understands the requirements under the IASR and utilizes them in practice.</li> <li>• Conduct an assessment of future web functionality to ensure compliance and adequate accessibility features.</li> </ul>	<p>Complete</p> <p>In progress</p>	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A</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"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>

### Part 3: Employment Standards

Initiative	ISAR Requirement	Action	Status	Compliance Date
<b>3.1 Recruitment, General</b>	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment	<ul style="list-style-type: none"> <li>• Review of all mechanisms for posting positions (website, print)</li> <li>• Incorporate language on postings and website to make</li> </ul>	Complete	January 1, 2016

	processes.	applicants (internal/external) aware that in accordance with AODA accommodation is available		
<b>3.2 Recruitment, Assessment or Selection Process</b>	<p>3.2.1 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>3.2.2 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>	<ul style="list-style-type: none"> <li>• Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request</li> <li>• Encourage and provide more diversity-related training to Staffing Managers/Recruiters on how to engage in conversations to solicit and handle accommodation requests, in accordance with AODA (how to ask for accommodation – develop scripts)</li> <li>• Educate Staffing Managers/Recruiters on inclusive selection strategies developed by Ontario Human Rights Commission and on how to implement and</li> </ul>	Complete	January 1, 2016

		<p>request support for accommodation related requests in accordance with AODA</p> <ul style="list-style-type: none"> <li>• Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA</li> </ul>		
<b>3.3 Notice to Successful Applicants</b>	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Incorporate in offer letter a section regarding Turn Key Staffing's accessibility policies and where to access additional information on Turn Key's internal and external internet	Complete	January 1, 2016
<b>3.4 Informing Employees of Supports</b>	3.4.1 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.	Develop communication strategy to educate and advise employees people on Turn Key Staffings' accessibility policies, plan and processes	Complete	January 1, 2016
	3.4.2 Employers	Accessibility policies	Complete	January 1, 2016

	shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	and processes to be incorporated in onboarding process		
	3.4.3 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.	Develop process and strategy to communicate any policy changes by email and alternate methods	Complete	January 1, 2016
<b>3.5 Accessible Formats and Communication Supports for Employees</b>	3.5.1 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	<ul style="list-style-type: none"> <li>• Educate employees and Managers on the availability of accessible format and communication supports; in accordance with AODA</li> <li>• Educate employees and Managers on process for requesting accessible formats and communication supports</li> </ul>	Complete	January 1, 2016



	that is generally available to employees in the workplace.			
	3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Develop a process for consulting with employees to determine accommodation needs	Complete	January 1, 2016
<b>3.6 Workplace Emergency Response Information</b>	3.6.1 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.	Develop process to provide employees who request, or for whom Turn Key Staffing is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information	Complete	January 1, 2016
	3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the	Include a process to obtain consent from the employee to share the information with those designated to provide assistance in the event of an emergency	Complete	January 1, 2016

<p>employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.</p>			
<p>3.6.3 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>Upon request, a Health &amp; Safety Representative will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible</p>	<p>Complete</p>	<p>January 1, 2016</p>
<p>3.6.4 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</p>	<p>Include a guideline in the process for creating Individualized Workplace Emergency Response Information for when plans and information are to be reviewed due to a move, or change in accommodation needs</p>	<p>Complete</p>	<p>January 1, 2016</p>

	response policies.			
<b>3.7 Documented Individual Accommodation Plans</b>	3.7.1 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.	Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA	Complete	January 1, 2016
	3.7.2 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	<ul style="list-style-type: none"> <li>• Create a documented individual accommodation process and plan that will incorporate the following elements: <ul style="list-style-type: none"> <li>- Manner in which employee can request</li> <li>- Under which circumstances medical assessment is required</li> <li>- Who will be assessing the medical provided (physician or insurance provider)</li> <li>- Work with medical partner to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests</li> <li>- Accommodation</li> </ul> </li> </ul>	Complete	January 1, 2016

	<p>or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual</p>	<p>Plans will incorporate confidentiality requirements and outline when, to whom, and what information may be shared</p> <ul style="list-style-type: none"> <li>• Educate employees on the Accessibility policies and processes and procedures for requesting individual plans</li> <li>• Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA</li> </ul>		
--	--	---	--	--

	<p>accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
<b>3.8 Return to Work Process</b>	<p>3.8.1 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>3.8.2 The return to work process shall, (a) outline the steps the employer will take to facilitate the return to work of</p>	<ul style="list-style-type: none"> <li>• Liaise with H&amp;S Consultant to conduct a review of the current return to work process</li> <li>• Update and document return to work process based on gaps and compliance requirements</li> </ul>	Complete	January 1, 2016

	employees who were absent because their disability required them to be away from work; and (b) use documented individual accommodation plans, as part of the process.			
<b>3.9 Performance Management</b>	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.	<ul style="list-style-type: none"> <li>• Assess current performance review processes to ensure accessibility features are incorporated (<i>i.e.</i>, forms accessible, conversations in plain language).</li> <li>• Ensure updated/new performance management processes to be rolled out incorporate accessibility features</li> <li>• Ensure training or communications to Managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation</li> </ul>	Complete	January 1, 2016
<b>3.10 Career Development &amp;</b>	An employer that provides career	<ul style="list-style-type: none"> <li>• Review of current training and</li> </ul>	Complete	January 1, 2016

<b>Advancement</b>	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.	professional development materials to determine accessibility features <ul style="list-style-type: none"> <li>• Ensure all future developed training and materials are developed with accessibility features in mind</li> <li>• Track career progression of individuals with disabilities</li> </ul>		
<b>3.11 Redeployment</b>	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.	<ul style="list-style-type: none"> <li>• Review and update of current transfer and redeployment practices and processes to ensure accommodation plans are referenced</li> <li>• Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs</li> </ul>	Complete	January 1, 2016