

# ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

## 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.  | Policies completed.  | Complete   | January 1, 2014 |
| 4       | Accessibility Plans                     | <p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p> | <p>Multi-year accessibility plan complete.</p> <p>Identified barriers.</p> <p>Link to PDF of document and contact information on Corporate website.</p> <p>HR will review in January every year.</p> | <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Ongoing</p> | January 1, 2014 |

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| 6 | Self-Serve Kiosks | 6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.   | When ordering any goods or services (furnishings, i.e. desks, chairs, lamps, rugs, etc.) will consider accessibility issues.<br><br>Not applicable at this time. | Ongoing  | January 1, 2014 |
| 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,<br>(a) all employees, and volunteers;<br>(b) all persons who participate in developing the organization's policies; and<br>(c) all other persons who provide goods, services or facilities on behalf of the organization. | Online training available.   | Complete | 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.  | Identified and communicated.             | Ongoing | 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. | Identified and communicated.             | Ongoing | 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.  | Communicated.                            | Ongoing | January 1, 2016 |
| 12      |   | 12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.   | Statement included in Corporate website. | Ongoing | January 1, 2016 |

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| 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. | Communication sent to IT at Corporate regarding WCAG 2.0 Level A and AA. | Ongoing | <p><b>January 1, 2014</b><br/>New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p><b>January 1, 2021</b><br/>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> |
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**PART III – Employment Standard**

| Section | Initiative                                   | Description  | Action  | Status   | Compliance Date |
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| 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.  | Statement included in job postings.   | Complete | January 1, 2016 |
| 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.<br>(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. | Applicants will be notified via telephone and email that we are an equal opportunity employer.  | Complete | 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.   | Statement included in hire letter that we are an equal opportunity employer.<br><br>Provide verbal offer that includes statement that we are an equal opportunity employer. | Complete | 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.   | Information on Integrated Accessibility Standards Policy communicated.<br><br>Policy posted on Intranet and in Employee Handbook.   | Complete | January 1, 2016 |



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| 25 |   | 25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.  | Provide new employees with information during the orientation process.   | Complete | 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)   | Complete | 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,<br><br>(a) information that is needed in order to perform the employee's job; and<br><br>(b) information that is generally available to employees in the workplace. | Current mandatory information that is required for employees to perform duties has been identified.<br><br>Information currently part of employee communication has been identified. | Complete | January 1, 2016 |
| 26 |   | 26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.   | Supports available for the employee have been identified.  | Complete | January 1, 2016 |

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| 27 | Workplace<br>Emergency<br>Response<br>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.                                  | Process in place. | Complete | 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.                                  | Process in place. | Complete | 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.   | Process in place. | Complete | January 1, 2012 |
| 27 |   | (4) Every employer shall review the individualized workplace emergency response information,<br>(a) when the employee moves to a different location in the organization;<br>(b) when the employee's overall accommodations needs or plans are reviewed; and<br>(c) when the employer reviews its general emergency response policies. | Process in place. | Complete | January 1, 2012 |



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| 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 disabilities.  | Process in place. | Complete | January 1, 2016 |
| 28 |   | <p>28 (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 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.</li> </ol> | Process in place. | Complete | January 1, 2016 |

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|    |                        | <p>5. The steps taken to protect the privacy of the employee's personal.</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 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> |                   |          |                 |
| 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>(b) shall document the process.</p>   | Process in place. | Complete | January 1, 2016 |

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| 29 |                                  | <p>29. (2) The return to work process shall,</p> <p>(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</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> | Process in place.                      | Complete | January 1, 2016 |
| 29 |                                  | <p>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.</p>   | Include in our Return to Work Process. | Complete | January 1, 2016 |
| 30 | Performance Management           | <p>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.</p>  | Process in place.                      | Complete | January 1, 2016 |
| 31 | Career Development & Advancement | <p>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.</p>                               | Equal opportunity currently in place.  | Complete | January 1, 2016 |

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| 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. | Accessible accommodation available upon request. | Complete. | January 1, 2016 |
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**PART IV.1 – Design of Public Spaces Standards (Accessibility Standards for the Built Environment)**

| Section | Initiative   | Description   | Action  | Status    | Compliance Date |
|---------|--|---|---|-----------|-----------------|
| 80      | Making new or redeveloped public spaces accessible | 80.(21)-80.(43) Obligated organizations, other than small organizations, shall ensure that when building new public spaces or making planned significant alterations to existing public spaces that accessibility is incorporated and the requirements under the Design of Public Spaces Standard is adhered to. This applies to: <ul style="list-style-type: none"> <li>▪ Exterior paths of travel</li> <li>▪ Off-street parking lots</li> <li>▪ Waiting areas</li> </ul>  | All alterations done to date are compliant with the accessibility standard. GGHS will continue to ensure technical accessibility standards requirements are met when building new or replacing and building new or making planned significant alterations to the following existing spaces: <ol style="list-style-type: none"> <li>1. Exterior paths of travel (i.e. sidewalks/walkways and associated elements, such as ramps)</li> <li>2. Accessible off street parking</li> <li>3. Service-related elements such as waiting areas</li> </ol> | Complete. | January 1, 2018 |
| 80      | Maintenance of accessible elements                 | 80.(44) In addition to the accessibility plan requirements set out in section 5, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following: <ol style="list-style-type: none"> <li>1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.</li> <li>2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order.</li> </ol> | GGHS has a program in place and/or procedures for preventative and emergency maintenance of accessible elements in public spaces which include interior and exterior paths of travel such as walkways, stairs, ramps, parking lots and lifting devices such as elevators.<br>To the extent possible, notice regarding any disruption to accessible elements due to planned maintenance or repairs impacting customer accessibility will be posted   | Complete  | January 1, 2018 |

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|  |  |  | <p>in advance, including information about the disruption, its anticipated duration, and a description of alternative accessible elements that may be available. This notice may be provided by posting notices in a conspicuous place on GGHS premises, website and/or such other method as is reasonable under the circumstances.</p> |  |  |
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