



Integrated
Accessibility
Standards
Regulations –
Multi Year Plan

AODA, 2005

Prepared By: Human Resources and available on AOC's website (www.aoc-resins.com/web/site/location). Accessibility listed under "AOC Ontario Plant". This document is available in an accessible format upon request.



Table of Contents

Introduction.....3

Integrated Accessibility Standards Regulations Requirements.....3

Accessibility Statement.....4

Definitions.....5

Multi Year Plan – Part I General Requirements.....7

Multi Year Plan – Part II Information & Communication Standards.....9

Multi Year Plan – Part III Employment Standards.....12



Introduction

AOC Resins and Coatings Company and AOC Canada are committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and we will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

The following plan has been established by AOC Resins and Coatings Company and AOC Canada Inc. (“**AOC**”) to govern the provision of services in accordance with Regulation 191/11, “Integrated Accessibility Standards” (“**Regulation**”) under the *Accessibility for Ontarians with Disabilities Act, 2005* (the “**Act**”). These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

AOC has developed and will maintain and document an Accessibility Plan outlining AOC’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on AOC’s website. Upon request, AOC will provide a copy of the Accessibility Plan in an accessible format.

Integrated Accessibility Standards Regulation (IASR) Requirements

- General Requirements
 - Policies
 - Multi-year Accessibility Plan
 - Self-Serviced Kiosks
 - Education and Training
- Information and Communication Standards
 - Feedback, Accessibility Formats and Communication Supports
 - Emergency Procedures, Plans or Public Safety Information
 - Accessible Websites and Web Content
- Employment Standards
 - Recruitment – general, assessment and selection process, notice to successful applicants
 - Informing Employees of Accessible Formats and Communication Supports



- Documented Individual Accommodation Plans, and Return to Work Process
- Performance Management, Career Development and Redeployment

In accordance with the requirements set out in the IASR, AOC will:

1. Establish, review and update this plan to meet the above criteria;
2. Post this plan on our website;
3. Report as required on its website on the progress of the implementation of this plan;
4. Provide this plan in an accessible format upon request; and
5. Review and update this plan at least once every five years.

AOC Accessibility Statement

“We are an accessible organization. This document/information is available in accessible formats upon request.”



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

Definitions:

The following defined words shall have the meanings attributed to them:

“**barrier**” as defined in the *Accessibility for Ontarians with Disabilities Act, 2005*, means anything that prevents a Person with a Disability from fully participating in all aspects of society because of his or her Disability, including a physical barrier, an architectural barrier, an information or communication barrier, an attitudinal barrier, a technological barrier, a policy, or a practice.

“**disability**” defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code* is:

- (a) any degree of physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect, or illness and, without limiting the generality of the foregoing, include diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- (b) a condition of mental impairment or a developmental disability;
- (c) a learning disability or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- (d) a mental disorder; or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the **Workplace Safety and Insurance Act, 1997**.

“**employees**” means every person who may deal with the public or other third parties on behalf of AOC, whether the person does so as an employee, contractor, volunteer, or otherwise.

“**accessible formats**” may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities; (“format accessible”).

“**communication supports**” may include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, and other supports that facilitate effective communications.

“**large organization**” means an obligated organization with 50 or more employees in Ontario, other than the Government of Ontario, the Legislative Assembly or a designated public sector organization.



“obligated organization” means the Government of Ontario, the Legislative Assembly, a designated public sector organization, a large organization, or a small organization to which the standards in the Regulation apply.



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.	Draft policy for approval Approval Complete Post Externally(website-contact Corp IT), as well as hardcopy at front reception	Dec 2013	January 1, 2014
4	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.	a) Draft plan for approval Approval Complete Conduct external & internal office audit to identify barriers. Determine audit support options (external consultant or health & safety committee with facilities mgr) b) Post Externally(website-contact Corp IT) & Internally, as well as hardcopy at front reception c) Add to HR calendar a reminder to review this plan	Oct. 2013 April 2014 April 2014 May 2014 May 2014	January 1, 2014
6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities	Does not apply to AOC		January 1, 2014

		when designing, procuring or acquiring self-service kiosks.			
7	Training	<p>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,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization’s polices; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>Determine method and levels of training required to employees.</p> <p>Create a schedule of whom and when the training will occur. Roll out company wide</p> <p>Maintain a record of all completed training.</p>	<p>April 2014</p> <p>June 2014 – Nov 2014</p> <p>Dec 2014</p>	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.	<p>Review existing processes for receiving and responding to feedback are accessible</p> <p>Determine & document what the accessible formats may be requested, and add accessibility statement to the necessary documentation or information</p>	<p>June 2014</p> <p>Oct 2014</p>	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.	Determine & document what accessible formats may be requested, and add accessibility statement to the necessary documentation or information	Jan 2015	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.	Document and train employees to consult with the person making the request to determine suitability of the accessible format or communication support	Feb 2015	January 1, 2016

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Identify all communication methods (connect with marketing and operations teams) to the public and add accessibility statement to the necessary documentation or information	Oct 2015	January 1, 2016
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.	Does not apply – not open to the public		January 1, 2012
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.	Consult with corporate IT dept. of the upcoming compliance deadlines	Jan 2013, ongoing	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.



15-18	Educational & Training Resources & Materials; Training to Educators; Producers of Educational or Training Material; Libraries of educational & training institutions		Sections 15-18 do not apply to AOC		January 1, 2013 January 1, 2013 January 1, 2015 January 1, 2015
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PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
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.	<p>**Review and, if necessary, modify recruitment policies, procedures and processes</p> <p>Post accessibility statement as means to communicate the availability of accommodation. Statement to be used on all recruitment information & documentation</p>	<p>Jan 2015</p> <p>March 2015</p>	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>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.</p> <p>(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>	<p>1) Review and, if necessary, modify recruitment policies, procedures and processes</p> <p>Document and communicate a recruitment accessibility script for the interviewer to aid in the scheduling of an interview and or assessment for applicants</p> <p>2) Determine typical accommodations that could be made. Document and train recruitment employees and managers on how to consult with an applicant and how to arrange suitable individual accommodations that is or are reasonable to the organization</p>	<p>Jan 2015, ongoing</p> <p>July 2015</p> <p>July 2015</p>	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.	<p>**Review and, if necessary, modify recruitment policies, procedures and processes</p> <p>Update the offer of employment letter to notify candidates of accommodation process in place upon hire. Also include a verbal script for when verbal offers are made in advance of paper letters **could attach the IASR AOC policy to offer of employment letter</p>	<p>Jan 2015</p> <p>July 2015</p>	January 1, 2016
	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.	<p>Communicate with current and new employees of all the AODA policies, procedures and process. Done via email, or during orientation period.</p> <p>Communicate with employees via the same methods as noted above when updates or changes to existing policies are made. Accommodations to this format of communication will be made upon request.</p> <p>Train managers on how to consult with an employee who requires an accommodation(s) that is (are) reasonable to the organization. **Accessibility statement shall be added to all documents issued to employees.</p>	<p>Nov 2015</p> <p>Nov 2015</p>	



25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	See 25 (1) above		January 1, 2016
25		25.(3)Employers shall provide updated information to their 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) above		January 1, 2016
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>Determine and document what accessible formats may be requested</p> <p>Document and train managers on how to consult with an employee who requires an individual accommodation(s) that is (are) reasonable to the organization</p> <p>Identify all communication methods to employees and add accessibility statement to the necessary documentation or information</p>	Nov 2015	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.	See 26 (1) above		January 1, 2016

27	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.	**Review and, if necessary, modify workplace emergency response policies, procedures and processes. Work in conjunction with the Health & Safety Committee.	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.	Document and train managers on how to consult with a employee in a confidential manner who requires an individualized emergency plan Develop, document and communicate a form that captures the individualized workplace emergency response information with sign off authority to share information to employees providing the support during those times	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.	See Section 27 (1) above		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.	See Section 27 (1) above	Ongoing	January 1, 2012
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.	**Review and, if necessary, modify information related to documented individual accommodation plans, policies, procedures and processes Communicate with current and new employees of the process for documented individual accommodation plans. Done via email or during orientation period. Employees will be also communicated via the same methods as noted above when	June/July 2015	January 1, 2016



			updates or changes to existing policies are made. Accommodations to this format of communication will be made to employees upon request		
28		<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 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 	See Section 28. (1) above	Nov 2015	January 1, 2016

		<p>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>	**Review and, if necessary, modify return to work policies, procedures and processes.	Nov 2015	January 1, 2016
29		<p>(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>	See Section 29. (1) above.	Nov 2015	January 1, 2016



		(b) use individual documented accommodation plans, as described in section 28, as part of the process.			
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.	See Section 29. (1) above	Nov 2015	January 1, 2016
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 and, if necessary, modify return to work policies, procedures and processes. Document and train managers on how to consult with an employee during the performance management process.	July 2015	January 1, 2016
31	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.	Take into account the communication to accommodate employee needs. Document and train managers on how to consult with an employee during the career development & advancement process.	July 2015	January 1, 2016
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.	*Review and, if necessary, modify return to work policies, procedures and processes. Document and train managers on how to consult with an employee during the deployment process.	July 2015	January 1, 2016

For more information, please contact Human Resources at 519-823-4333