

Coppley Ltd.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 Multi-Year Plan

Part 1 - General Requirements

Section	Initiative	Description	Initial Action to Compliance (including status)	Continuous Improvement (Including Status)
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 referred to in this Regulation	Established AODA policies	Renewed. Latest revision dated July 12, 2023
		(2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	Established with IASR Employment Policy	Renewed. Latest revision dated July 12, 2023.
		(3) Every obligated organization, other than a small organization, shall, (a) prepare one or more documents describing the policies it developed under subsection (1); and (b) make the documents publicly available and, on request, provide them in an accessible format.	Statement posted on website 2019.	Policies and this document on website December 2023.
4	Accessibility Plans	4. (1) The Government of Ontario, Legislative Assembly, designated public sector organizations and 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.	Established Multi-year plan for IASR 2014	Updated 2019-2023.
			Statement posted on website.	Policies and this document on website December 2023.
			Updated 2019-2023	This document is next version 2024-2029.
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, (a) all persons who are an employee of, or a volunteer with, the organization; (b) all persons who participate in developing the organization's policies; and		Safety Talk completed October/November 2017 to all employees

Coppley Ltd.

<p>(c) all other persons who provide goods, services or facilities on behalf of the organization. O. Reg. 191/11, s. 7 (1); O. Reg. 165/16, s. 5 (1).</p> <p>(2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons. O. Reg. 191/11, s. 7 (2).</p> <p>(3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 191/11, s. 7 (3).</p> <p>(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis. O. Reg. 191/11, s. 7 (4).</p> <p>(5) The Government of Ontario, the Legislative Assembly, every designated public sector organization and every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>AODA training to applicable staff completed December 2014</p> <p>AODA training from Safety Talk added to Orientation as of November 2017</p> <p>documents stored on AODA binder in the HR office</p>	<p>AODA training to Supervisors November 2016</p> <p>Company-wide refresher December 2023.</p> <p>Company-wide refresher December 2023.</p>
--	---	---

Part 2 - Information and Communication Standards

Section	Initiative	Description	Initial Action to Compliance (including status)	Continuous Improvement (Including Status)
9	Feedback	<p>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 the provision of accessible formats and communications supports, upon request. O. Reg. 191/11, s. 11 (1).</p> <p>(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process.</p>	<p>Accessible Customer Service Plan and Feedback Form created Sept 2013</p> <p>Posted on website.</p>	<p>Policies and this document on website December 2023.</p>
12	Accessible Formats & Communication Supports	<p>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,</p> <p>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>(b) at a cost that is no more than the regular cost charged to other persons. O. Reg. 191/11, s. 12 (1).</p> <p>(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 12 (2).</p>		

Coppley Ltd.

		(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Posted on website.	
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.		Added visitors to Emergency Response Policy - July 1, 2021. Trained employees to take visitors with them during evacuation.
14	Accessible Websites and Web Content	(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.	Purchased Accessible June 2022, following an audit from the Ministry for Seniors and Accessibility	

Part 3 - Employment Standard

Section	Initiative	Description	Initial Action to Compliance (including status)	Continuous Improvement (Including Status)
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.	Include statement for AODA compliance in job ads and included on application.	
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. O. Reg. 191/11, s. 23 (1). (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.	Include statement for AODA compliance in job ads and included on application.	See examples on file.
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.	Part of ongoing recruitment process.	
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. O. Reg. 191/11, s. 25 (1).	Safety Talk completed October/November 2017 to all employees	

Coppley Ltd.

(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25 (2). Included in Orientation as of November 2017

(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. Employee Handbook given to all employees March 2020, includes reminder of this information.

26 Accessible Formats and 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. O. Reg. 191/11, s. 26 (1).

(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

Included in AODA - IASR Employment Policy - 2013

Latest Revision 2023.
See examples on file.

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. O. Reg. 191/11, s. 27 (1). Included in AODA - IASR Employment Policy - 2013

(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. O. Reg. 191/11, s. 27 (2). Accommodation plan form for employee 2017

(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. O. Reg. 191/11, s. 27 (3). See Return To Work Policy and Process July 19, 2019. Latest revision 2023.

(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.

Accommodation plan form for new employee March 2023

See Return To Work Policy and Process July 19, 2019. Latest revision 2023.

Coppley Ltd.

28	Documented Individual Accommodation plans	<p>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. O. Reg. 191/11, s. 28 (1).</p> <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 assist the employer in determining if accommodation can be achieved and, if so, 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 information.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. O. Reg. 191/11, s. 28 (2). <p>(3) Individual accommodation plans shall,</p> <ol style="list-style-type: none">(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;(b) if required, include individualized workplace emergency response information, as described in section 27; and(c) identify any other accommodation that is to be provided. O. Reg. 191/11, s. 28 (3).	Included in AODA - IASR Employment Policy - 2013	Latest revision - 2023
29	Return to Work Process	<p>29. (1) Every employer, other than an employer that is a small organization,</p>	RTW procedure informal for many years.	Formalized into Return To Work Policy and Process July 19, 2019. Latest revision 2023.

Coppley Ltd.

(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. O. Reg. 191/11, s. 29 (1).

(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 documented individual accommodation plans, as described in section 28, as part of the process. O. Reg. 191/11, s. 29 (2).

(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. O. Reg. 191/11, s. 29 (3).

Initial Letter to Employee Template created.

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.	Included in AODA - IASR Employment Policy - 2013	Latest revision - 2023
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.	Included in AODA - IASR Employment Policy - 2013	Latest revision - 2023
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.	Included in AODA - IASR Employment Policy - 2013	Latest revision - 2023

Part IV.2 - Customer Service Standards

Section	Initiative	Description	Initial Action to Compliance (including status)	Continuous Improvement (Including Status)
80.46	Establishment of Policies	<p>80.46 (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities. O. Reg. 165/16, s. 16.</p> <p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <p>1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.</p>	Established AODA - Customer Service Plan - 2013	Latest revision 2023.

Coppley Ltd.

2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.

3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.

4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability. O. Reg. 165/16, s. 16.

(3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so. O. Reg. 165/16, s. 16.

(4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person. O. Reg. 165/16, s. 16.

(5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request. O. Reg. 165/16, s. 16.

(6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.

80.47 Use of Service Animals and Support Persons

80.47 (1) This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises. O. Reg. 165/16, s. 16.

(2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises. O. Reg. 165/16, s. 16.

(3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities. O. Reg. 165/16, s. 16.

Included in AODA - Accessible Customer Service Plan 2013

Latest revision 2023.

Coppley Ltd.

(4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises. O. Reg. 165/16, s. 16.

(5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,

(a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and

(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises. O. Reg. 165/16, s. 16.

(6) If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person. O. Reg. 165/16, s. 16.

(7) If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises. O. Reg. 165/16, s. 16.

(8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person. O. Reg. 165/16, s. 16.

(9) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request. O. Reg. 165/16, s. 16.

(10) The notice required by subsection (9) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.

Coppley Ltd.

80.48	Notice of Temporary Disruptions	<p>80.48 (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 165/16, s. 16.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. O. Reg. 165/16, s. 16.</p> <p>(3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person. O. Reg. 165/16, s. 16.</p> <p>(4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request. O. Reg. 165/16, s. 16.</p> <p>(5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.</p>	Included in AODA - Accessible Customer Service Plan 2013	Latest revision 2023.
80.49	Training for All Staff	<p>80.49 (1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none">1. Every person who is an employee of, or a volunteer with, the provider.2. Every person who participates in developing the provider's policies.3. Every other person who provides goods, services or facilities on behalf of the provider. O. Reg. 165/16, s. 16. <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none">1. How to interact and communicate with persons with various types of disability.	Safety Talk completed October/November 2017 to all employees AODA training to applicable staff completed December 2014 Customer Service AODA training Dec 2014. New Customer Service Staff provided training 2018.	Reviewed with all staff in March 2020. AODA training to Supervisors November 2016 Refresher with Customer Service staff Feb 2019. Refresher November 2023.

Coppley Ltd.

2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.

3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.

4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities. O. Reg. 165/16, s. 16.

(3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 165/16, s. 16.

(4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46. O. Reg. 165/16, s. 16.

(5) Every provider, other than a small organization, shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided. O. Reg. 165/16, s. 16.

(6) Every provider, other than a small organization, shall,

(a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and

(b) on request, give a copy of the document to any person. O. Reg. 165/16, s. 16.

(7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request. O. Reg. 165/16, s. 16.

(8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.

80.50 (1) Every provider shall establish a process for receiving and responding to,

(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and

(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3). O. Reg. 165/16, s. 16.

AODA training from Safety Talk added to Orientation as of November 2017

Refresher with Customer Service staff November 2023.

Included in orientation since Nov 2017

Training records maintained in AODA binder

80.5 Feedback Process Required

Included in AODA - Accessible Customer Service Plan 2013

Latest revision 2023.

Coppley Ltd.

(2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities. O. Reg. 165/16, s. 16.

(3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request. O. Reg. 165/16, s. 16.

(4) Every provider shall make information about the feedback process readily available to the public. O. Reg. 165/16, s. 16.

(5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person. O. Reg. 165/16, s. 16.

(6) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (5) is available on request. O. Reg. 165/16, s. 16.

(7) The notice required by subsection (6) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.

80.51 Format of Documents

80.51 (1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,

(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. O. Reg. 165/16, s. 16.

(2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 165/16, s. 16.

Included in AODA - Accessible
Customer Service Plan 2013

Latest revision 2023.