

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

### INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan for EveryMind

Date of Review: April 2024

#### Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Who is responsible	Status	Compliance Date
1	Establishment of Accessibility Policies	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 rolled out	Director, People & Culture	Compliant	January 1, 2014  Reviewed January 6 2020
2	Accessibility Plans	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.	Review plan and modify as needed  Post Plan on website;  Senior Team to review along with all Policy review every 3 years	Director, People & Culture  Communications  Director, People & Culture	Compliant  Compliant  Compliant	January 1, 2014  January 2020

3	Self-Serve Kiosks	Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Not applicable at present			January 1, 2014
4	Training	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.	Training to be provided to all staff, volunteers and contractors (via on line training workshop)  Consultants, psychiatrists and temp staff (via written policy and procedure)	People & Culture	Compliant  Compliant	January 1, 2015

**PART II – Information and Communications Standards**

Section	Initiative	Description	Action	Who is responsible	Status	Compliance Date
5	Feedback	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.	Ensure that the feedback forms on the website and hard copies at reception can be provided in alternate accessible formats, upon request (e.g. reading out loud, larger font, digital copy, hard copy)	Admin services with P & C consult	Compliant	January 1, 2015
			Review all internal and external feedback mechanisms (e.g. staff surveys and client surveys)	People & Culture	Compliant	
			Ensure Internal and external feedback communications are accessible in an accessible format, upon request (e.g. reading out loud, larger font, digital copy, hard copy)	People & Culture	Compliant	
6	Accessible Formats & Communication Supports	Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports	Ensure that Internal documents such as policies, procedures, forms and others are available to staff upon request, in an alternate accessible format (e.g.		Will provide upon request	January 1, 2016

		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.	reading out loud, larger font, digital copy, hard copy)			
7		The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	Ensure a process to document meeting and discussion with anyone who requests an accessible format or communication support. This includes staff and clients.	all	Will comply upon request	January 1, 2016
8		Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Ensure this is posted on website and at each reception site  Post this notice at the bottom of our email communications.	Communications  People & Culture	Compliant  Compliant	January 1, 2016
9	Emergency Procedures, Plans or Public Safety Info	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,	Reference compliance guidelines to ensure this applies to our organization  Internal email for evacuation will have this added.	Building Management and P & C/ Health & Safety Committee	Compliant	January 1, 2012

		upon request.				
10	Accessible Websites & Web Content	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.	Website to be compliant as per legislation  Web site designer and web site provider to liaise.	Communications	Compliant	<p><b>January 1, 2014</b></p> <p>New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p><b>January 1, 2021</b></p> <p>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 III – Employment Standard**

Section	Initiative	Description	Action		Status	Compliance Date
11	Recruitment – General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Reference accommodation statement in internal, external job postings	People & Culture	Compliant	January 1, 2016
12	Recruitment, Assessment or Selection Process	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. (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.	Notification via email and/or phone to candidates when confirming interviews that accommodation is available upon request.  Confirm with recruitment agencies that they are AODA compliant, during hiring through agency. Ensure that vendor agreements with recruitment agencies have a question about being AODA compliant.	People & Culture	Compliant	January 1, 2016
13	Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Add an accommodation clause to employment agreement and offer email/letter.	People & Culture	Compliant	January 1, 2016
14	Informing Employees of Supports	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.	Accessibility Policy and procedures to be reviewed on an annual basis, as per usual process for policy review for all staff	People & Culture	Compliant	

15		Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Review IAS Policy on orientation day within 3 months of hire.	People & Culture	Compliant	January 1, 2016
16		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.	Regular Policy Review and sign off process.	People & Culture	Compliant	January 1, 2016
17	Accessible Formats & Communication Supports for Employees	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.	Review and assess job descriptions for possible accommodation requests for accessible formats and communication supports, that are essential to perform the job.	People & Culture	Compliant	January 1, 2016
18		The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Develop a process to document request and discussion of request with supervisor and HR.	People & Culture	Compliant	January 1, 2016

19	Workplace Emergency Response Information	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.	Provide written notification via email to employees who have identified a disability about assistance during emergency response; identify who will assist them.	Admin support services	Complete as needed	January 1, 2012
20		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.	Provide written notification via email to employees who have identified a disability about assistance during emergency response; identify who will assist them.	People & Culture	Complete as needed	January 1, 2012
21		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.	Email communication sent by Admin support Services when announcing evacuation drill.	Admin support services	Complete as needed	January 1, 2012
22		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	To be done on an ongoing basis at appropriate times		Complete as needed	January 1, 2012

		(c) when the employer reviews its general emergency response policies.				
23	Documented Individual Accommodation Plans	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.	Accommodation Policy in place	People & Culture	Compliant	January 1, 2016
24		<p>The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>a. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>b. The means by which the employee is assessed on an individual basis.</li> <li>c. 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>d. 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</li> </ol>	Review Accommodation Policy and procedure and ensure it meets requirements of AODA legislation	People & Culture	Compliant	January 1, 2016

		<p>agent, in the development of the accommodation plan.</p> <p>e. The steps taken to protect the privacy of the employee's personal information.</p> <p>f. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>g. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>h. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>				
25	Return to Work Process	<p>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>	Return to work Policy and procedure and ensure it meets requirements of AODA	People & Culture	Compliant	January 1, 2016

26		<p>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>	<p>Review RTW policy and procedure and ensure it meets requirements of AODA</p>	<p>People &amp; Culture</p>		<p>January 1, 2016</p>
27		<p>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>	<p>Review RTW policy and procedure and ensure it meets requirements of AODA</p>	<p>People &amp; Culture</p>	<p>Compliant</p>	<p>January 1, 2016</p>
28	<p>Performance Management</p>	<p>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>	<p>Review and add to Performance Appraisal policy and processes</p> <p>Is the language inclusive?</p> <p>Is the PA process accessible upon request to staff who have disability?</p> <p>eg employee self evaluation is available in alternate format such as hard copy, larger font instead of online evaluation.</p>	<p>People &amp; Culture</p>	<p>Compliant</p>	<p>January 1, 2016</p>
29	<p>Career Development &amp; Advancement</p>	<p>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>		<p>People &amp; Culture</p>	<p>Compliant</p>	<p>January 1, 2016</p>

30	Redeployment	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 Add to Job transfer or “Acting position” policies, that accommodation needs will be taken into consideration.	People & Culture	Compliant	

#### Part IV: Building Accessibility

Section	Initiative	Description	Action	Who is responsible	Status	Compliance Date
31	Ontario Building Code Requirements	The organization will be compliant with the Ontario Building Code which promotes public health and safety, fire protection, resource conservation, environmental integrity and accessibility. Its purpose is the promotion of public safety through the application of uniform building standards.		Manager, Executive Services	Compliant	Reviewed April 2024
32	Ongoing Improvements	The organization commits to ongoing improvements as possible to support accessibility to buildings and locations.	Identify opportunities to increase building accessibility in the organization’s three-year maintenance plan through installation of ramps, paddle doors, AODA compliant washrooms, etc.	Manager, Executive Services & Maintenance Coordinator	Ongoing	Must be done whenever there is a building project that involves major structural alteration.  Additional improvements integrated when possible.

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