



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT AODA), 2005

INTEGRATED ACCESSIBILITY STANDARDS -- Multi-Year Plan

Part 1 - GENERAL REQUIREMENTS

Section	Initiative	Description	Action - Assigned	Gap	Status	Compliance Date
3	Establishment of Accessibility Policy	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 Regulation 191/11 of the AODA.	Policy completed - HR	No	Policy Approved December 10, 2013	1-Jan-14
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 Regulation 191/11 of the Act; 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 (5) years.	HR attended workshop. Potential barriers identified. Plan completed. HR will review annually to record progress and meet reporting requirements - HR	No	Plan approved December 15, 2015	1-Jan-14

6	Self-Service Kiosks	4. (1) Large organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Review adjustability of Visitor sign-in terminal Facilities Manager / Engineering Services Manager,	15-Nov-15	1-Jan-16
7	Training	7. (1) Every obligated organizations shall ensure that training is provided on the requirements of the accessibility standards referred to in Regulation 191/11 and on the Human Rights Code as it pertains to persons with disabilities to a) all employees and volunteers; and c) all other persons who provide goods, services or facilities on behalf of the organization.	Identify or develop & deliver training program to employees and communication material for other persons. - HR	15-Nov-14	1-Jan-15

Part 2 - INFORMATION & COMMUNICATIONS STANDARDS

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 on request	<p>Consult with all disciplines.</p> <p>Conduct a review of all external and internal feedback processes (customer contact, retiree contact &amp; employee surveys).</p> <p>Determine the type of accessible format to be made available.</p> <p>Ensure managers and staff are aware of this service (part of training) - HR</p>	No	<p>External &amp; internal contacts review shows that customers, retirees and employees are contacted in person, on telephone, by email, electronic &amp; paper wordprocessing and presentation files. These have accessible formats - e.g. colour &amp; font.</p> <p>Voice recording(s) or braille to be arranged if and when request.</p> <p>Managers &amp; staff training is ready for the New Year 2016.</p>	1-Jan-15
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12	Accessible Foremats & 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 that the regular cost charged to other persons.</p>	<p>Determine the type of accessible format to be made available.</p> <p>Determine how long it will take to provide those formats (target 24 hour turnaround).</p> <p>Ensure managers and staff are aware of this service (part of training); and any charge will be no more than the same reasonable cost charged to all outsiders. - HR</p>	No	<p>External &amp; internal contacts review shows that customers, retirees and employees are contacted in person, on telephone, by email, electronic &amp; paper wordprocessing and presentation files. These have accessible formats - e.g. colour &amp; font.</p> <p>Voice recording(s) or braille to be arranged if and when request.</p> <p>Managers &amp; staff training is ready for in New Year 2016.</p>	1-Jan-15
12		<p>12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>Ensure managers and staff are aware of this service, know how to determine and offer options (e.g. larger font, different colour, read out loud). Include as part of AODA employee training - HR.</p>	No	<p>Manager - staff training prepared.</p>	1-Jan-16
12		<p>12. (3) Every obligated organization shall notify the public about the availability of accessible formats or communication supports.</p>	<p>Post notifications on policy statement, employee training and orientation, on job postings, on external correspondence, and certain business cards. HR - Senior Leadership Team</p>	No	<p>Notifications ready.</p>	1-Jan-16

14	Accessible Websites & Web Content	14. (2) Designated large organizations shall make their internet websites and webcontent 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.	Engaged IT for review. - HR	Yes	<p>January 1, 2014 new internet websites and web content on those sites must conform to WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCGA 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 3 - EMPLOYMENT STANDARDS**

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 accessibility statement in employment advertisements or postings regardless of the advertising medium. Ensure that contract recruiters and temporary employment agencies are aware of and apply Dana Canada's policy commitment. - HR	No	<p>Statement has been distributed to all HR Managers and is in use on postings in Dana Canada (Ontario).</p> <p>1-Jan-16</p>
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23	Recruitment, Assessment or Section Process	<p>23. (1) During a recruitment process, an employer shall notify applicants when they are individually selected to participate in an assessment or selection process (recruits), that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>(2) If a selected applicant (recruit) 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 need due to disability.</p>	<p>Advise recruit of the availability of accommodation: e.g. print, colour, verbal interview/testing.</p> <p>Include accommodation considerations in staff training on Recruitment &amp; Hiring.</p> <p>Ensure interview or testing rooms are accessible. _ HR</p>	No	<p>Advisory Statement has been distributed to all HR Managers and is in use when contacting applicants selected for screening in Dana Canada (Ontario).</p>	1-Jan-16
24	Notice to Successful Applicants	<p>24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<p>Include accessibility statement in the employment offer. - HR</p>	No	<p>Statement has been distributed to all HR Managers and is in use on offer letters in Dana Canada (Ontario).</p>	1-Jan-16
25	Informing Employees of Supports	<p>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 accommodation that take into account an employee's accessibility needs due to disability.</p>	<p>Develop &amp; conduct training. - HR</p> <p>Circulate the policy. - HR</p>	No	<p>Training from Ontario Human Rights website; circulated to all HR manager in Dana Canada; with summary of policies &amp; processes for employees that have Accessibility standards ready.</p>	1-Jan-16

25		25. (2) Employer shall provide the information required under this section to their new employees as soon as practicable after they begin their employment.	Include accessibility plan, policy & processes in orientation. HR	No	Accessibility plan, policy & processes information has been prepared and circulated to HR Managers for employee orientation.	1-Jan-16
25		25. (3) Employer shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to disability.	Include updates to accessibility plan, policy & processes in orientation., and employee refresher training. - HR	No	Accessibility plan, policy & processes updates will be prepared and circulated to HR Managers for employee training.	1-Jan-16
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 (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.	Determine information needed to do job such as job descriptions, work instructions, job break-down sheets; and,  Determine what other information is provided including policies, employee handbooks and employee benefit book; and,  Determine the formats in which they are available. - HR	No	Job descriptions, job break-down sheets, Handbook, Benefit Books & Retirement Savings Plan descriptions are available in wordprocessing software, adaptable for colour & font. If and when requested, braille or voice recording will be provided.	1-Jan-16

26		26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Ensure managers and staff are aware of this service, know how to determine and offer options (e.g. larger font, different colour, read out loud). Include as part of AODA employee training. HR	No	Included in Manager & staff training.	1-Jan-16
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 then individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.	Standard verbal & email communication developed for supervisors to send to employees & on record with HR. Included in Employee Training and in Orientation	No	Complete	1-Jan-12
27		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 employee to provide assistance to the employee.	Standard verbal & written communication developed for buddies is on record with HR. Included in Employee Training and in Orientation	No	Complete	1-Jan-12
27		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.	Target 24 hours for provision.		Complete	1-Jan-12



27	<p>27. (4) Every employer shall review individualized workplace emergency reponse information:</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodation needs or plans are reviewed;</p> <p>and,</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<p>Review standards at a, b &amp; c are documented in Emergency Response Policy and are built into Manager - Supervisor orientation. - Health &amp; Safety Manager</p>	Complete	1-Jan-12		
28	<p>Documented Individual Accommodation Plans</p>	<p>28. (1) Employers, ....., shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p>	<p>Document process.</p> <p>Integrate in to our Early &amp; Safe Return to Work Procedure (ESRTW).</p> <p>Include as part of Employee Training &amp; Orientation. - HR</p>	No	Complete	1-Jan-16

28. (2) The process for the development of documented individual accommodation plans shall have the following elements:

1. The manner in which an employee requesting accommodation can participate in the development of the 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 accommodation can be achieved;
4. The manner in which the employee can request the participation of a representative from their 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 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;

Integrated in to our Early & Safe Return to Work Procedure (ESRTW). - HR

No

Complete

1-Jan-16

29	Return to Work Process	29. (1) Every employer: (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 accommodation in order to return to work; (b) shall document the process.	Process is developed, documented & included as part of Employee Training & Orientation. - HR	No	Complete	1-Jan-12
29		29. (2) The return to work process shall: (a) outline the steps the employer will take to facilitate the return to work of employees who are absent because their disability required them to be away from work, and; (b) use individual documented accommodation plans as described in Section 28 as part of the process.	Accommodation Plan standard adopted. - HR	No	Complete	1-Jan-16
30	Performance Management	30. (1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans when using its performance management process in respect of its employees with disabilities.	Accessibility formats (wordprocessing software, font, colour & print) apply to PM process.  PM Process updated to direct manager to review Individual Accommodation Plan at Goal Setting & Performance Review stages. - HR	No	Complete	1-Jan-16
31	Career Development & Advancement	31. (1) An employer that uses provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans when providing career development and advancement to its employees with disabilities.	Accessibility formats (wordprocessing software, font, colour & print) apply to Talent Management (T-M) process.  TM Process updated to direct manager to review Individual Accommodation Plan at Talent Review and Assignment stages - HR	No	Complete	1-Jan-16

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.	<p>Accessibility formats (wordprocessing software, font, colour &amp; print) apply to Redeployment process.</p> <p>Redeployment Process updated to direct manager to review Individual Accommodation Plan at Employee Assessment and Re-Assignment stages - HR.</p>	No	Complete	1-Jan-16
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**Part 4.1 - BUILT ENVIRONMENT**

32	Meet the Accessibility Standards for Design of Public Spaces when building or making modifications to public spaces	<p>Applicable public spaces in Dana Canada are:</p> <p>a) outdoor paths of travel such as sidewalks, stairs, curbs, parking lots and ramps;</p> <p>b) service-related areas such as reception.</p>	<p>Revise Construction, building &amp; renovation policy to integrate the AODA Built Environment requirements. Facilities Manager / Engineering Services Manager</p> <p>Ensure responsible staff know and apply the requirements by January 1, 2017. - HR</p>	No	Complete	1-Jan-19
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