



Voortman

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

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.	3.(1) Created policy and has been approved by Human Resources Department	Complete	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.	4.(1)a) Developed and approved b) Posted in plant and on website c) HR will review every year	Complete / Ongoing Complete Ongoing	January 1, 2014

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.	6.(2) Not applicable	N/A	
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 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.	7.(1) Initial full training done upon hire as part of the onboarding process. Refresher training done on a yearly basis on annual company training day. Specialized Customer Service training given to all employees who deal with the public.	Ongoing Ongoing Ongoing	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.	11.(1) Review all feedback processes across the organization yearly to ensure accessibility. Accessible formats and communication supports provided upon request will include: text to speech, large print, accessible PDF's, plain language versions Staff and Management are aware of the need to accommodate feedback processes upon request – refreshed at annual training	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.	12.(1) Accessible formats and communication supports provided upon request will include: text to speech, large print, accessible PDF's, plain language versions a) Accessible formats and supports will be provided in a timely manner. b) Staff and Management are aware that no additional charge is required – refreshed at annual training	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.	12.(2) Staff and Management are trained on the need to consult with the individual requesting the accessible format. Refreshed at annual training.	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	12.(3) Posted in Plant Lobby Posted on website	Complete	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.	13.(1) Will make available emergency procedure in accessible formats when requested.	Ongoing	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.	14.(2) Website updated October 2015 does meet WCAG 2.0 Level A requirements	Complete	After January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.
			HR to maintain contact/give direction to website designers on an ongoing basis to ensure AODA compliance.	Ongoing	January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, -success criteria 1.2.4 Captions (Live) -success criteria 1.2.5 Audio Descriptions (Pre-recorded).

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.	22.(1) Posted jobs, job application forms and website application process updated to include statement on accommodating people with disabilities.	Complete	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>23.(1) HR to notify selected job applicants by telephone or email, (depending on their needs) that accommodations are available upon request.</p> <p>23.(2) HR to identify possible barriers (location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork). HR will consult with applicant prior to interview and/or testing.</p>	Ongoing	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.	24. New Hire letter includes statement regarding policies for accommodating employees with disabilities.	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.	25.(1) Training on AODA is done annually for all employees.	Ongoing	January 1, 2016
25	Informing Employees of Supports	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	25. (2) AODA policies included in the new hire orientation package.	Ongoing	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.	25.(3) Any updates to AODA will be communicated to employees on the annual training day. If necessary, major updates will be communicated to employees as required.	Ongoing	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>26.(1a) When a request arises, the company will perform a functional audit (information based) specific to departments involved to ensure it meets accommodation needs wherever feasible.</p> <p>26.(1b) When a request arises, the company will perform a review of regular communication formats throughout all departments to ensure it meets the accommodation needs wherever feasible.</p>	Ongoing	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.	26.(2) When a request arises the company will meet with the employee to determine which accessible format/communication support is suitable to their needs (text-to-speech, large print, accessible PDFs, plain language versions)	Ongoing	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.	<p>27.(1) Once the employer has been made aware of the need for accommodation in emergency situations HR will meet with employee and complete an Individual Employee Response Information Form and an Identification of Potential Barriers During an Emergency Response Form.</p> <p>Company Notification Company has posted: any individual who requires accommodation in an emergency situation should approach their supervisor.</p>	Ongoing 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.	27.(2) This is part of process and will be done with employee's consent.	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.	27.(3) Once the supervisor is approached, per 27(1), they will inform HR as soon as possible regarding the employee's request. HR will then as soon as possible set up a meeting with the employee.	Ongoing	January 1, 2012

27	Workplace Emergency Response Information	(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.	27.(4) HR will review individualized workplace emergency response information: (a) when the employee changes departments, (b) when the employees accommodation needs/plans are reviewed, and (c) when HR reviews the general emergency response policies.	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.	28.(1) HR has developed an Accommodation Process to be referred to in all accommodation requests.	Complete	January 1, 2016
28		28.(2) The process for the development of documented individual accommodation plans shall include the following elements: a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. b) The means by which the employee is assessed on an individual basis. 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.	28.(2) a) HR, in conjunction with the employee will meet to complete an Individual Accommodation Plan. b) The employee will be assessed based on information they gather and supporting medical documentation. c) If information gathered in b) is lacking, unclear or insufficient then a meeting will be held with the employee to inform them of such. The company will inform the employee it would be beneficial for a referral to an IME and/or to have their doctor complete a Functional Capacity Assessment Form.	Ongoing	January 1, 2016

28	Documented Individual Accommodation Plans	<p>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 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>	<p>d) At any time during the accommodation process the employee can request (in writing) representation from their bargaining agent.</p> <p>e) HR maintains all employees' personal information in their main employment file. HR is the only one with access. If HR feels it necessary to share information the employee would first be notified and made aware of reasons to notify another party. Employee must give their verbal/written permission.</p> <p>f) Individual accommodation plans will be reviewed on a yearly basis, unless otherwise required at earlier date. The review will be conducted by HR in conjunction with the employee.</p> <p>g) In a situation where an accommodation is denied HR will meet with the employee and inform them why the request was denied.</p> <p>h) The individual accommodation plan will be provided to the employee in a format that takes into account their disability.</p>		
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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>	<p>29.(1a) HR has developed a Return to Work process that will be followed if a returning employee requires an accommodation.</p> <p>29.(1b) The process will be documented and become part of the employees file.</p>	Complete	January 1, 2016
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>	<p>29.(2a) HR has created and will follow Return to Work Process. If required a Job Task Analysis Form will also be completed prior to return to work.</p> <p>29.(2b) HR will refer to individual accommodation plan if available or if not, complete one.</p>	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>	<p>29.(3) HR will ensure the return to work process does not replace or override any other statutes.</p>		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>	<p>30.(1) HR will ensure any employee who receives performance management will have their accessibility needs taken into account as well as their individual accommodation plan.</p>		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.	31.(1) HR will ensure that prior to any employee receiving career development/advancement will have their accessibility needs and accommodation plan taken into account.		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.	32.(1) HR will ensure to take into account employees accessibility needs in cases of redeployment.		January 1, 2016