



Waterloo North Hydro Inc.

Integrated Accessibility Standards (IAS) – Multi Year Plan (2017 - 2022)

Accessibility for Ontarians with Disabilities Act

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 requirement under the accessibility standards referred to in this Regulation	WNH will review policies annually	Completed	January 1, 2014
			WNH created AODA Policy and Work Instructions	Completed	January 1, 2014
			REVISION – AODA policy and work instructions merged into Integrated Accessibility Standards (IAS) Policy	Completed	January 1, 2014
4	Accessibility Plans	4. (1) Large Organization 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 requirement under this Regulation; b) post the accessibility plan on their website, if any, and provide in an accessible format upon request; and c) review and update the accessibility plan at least once every five years	a) Multi Year Action Plan is completed b) Posted on WNH website c) Plan to be reviewed and updated no less than every five years	Completed	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
6	Self-Serve Kiosk	6.(2) Large organizations and small organizations shall have regard to the accessibility for person with disabilities when designing procuring or acquiring self service kiosk.	Not Applicable WNH does not operate/offer self-serve kiosks at this time	N/A	January 1, 2014
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 to 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.	Supervisors, Managers and Executives – attended workshops provided by Accessibility Experts Inc. All employees – attended workshop provided by Accessibility Experts Inc. WNH provided training to all new employees after 2011 using Infuse (online training) Refresher training planned for all employees on AODA changes in 2018	Completed 2011 2011 Training completed	January 1, 2015
Part II – Information and 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 upon request	WNH has a number of ways to provide feedback including: website, social media, email, phone, in-person, and in writing. If another method is requested we will provide and accommodate upon request.	Completed	January 1, 2015



Section	Initiative	Description	Action	Status	Compliance Date
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 support for persons with disabilities, a) in a timely manner that takes into account the person's disabilities; and b) at a cost that is no more than the regular cost charged to other persons.	Supports in place to provide accessible formats and communication supports in a timely manner. No additional costs for alternate format.	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	WNH will consult with each person making the request to determine the most suitable accessible format(s) and communications support(s).	Ongoing	January 1, 2016
12		12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports	Accessible formats and communications support options will be posted on WNH's website in the IAS Policy.	Ongoing	January 1, 2016
13	Emergency Procedures, Plans, Public Safety Information	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.	Not Applicable – Emergency information is not currently available to the public	Not Applicable	January 1, 2012



Section	Initiative	Description	Action	Status	Compliance Date
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 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	<p>WNL's website conforms with WCAG 2.0 Level A as of January 1, 2014.</p> <p>All web content updates conform to WCAG 2.0 level A.</p> <p>New WNL website to be launch in 2019 will conform to WCAG 2.0 Level AA</p> <p>WNL will continue to train employees responsible for website updates to conform to current standards.</p>	Completed	<p>January 1, 2014 - New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>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 Audit descriptions (pre-recorded)</p>



Section	Initiative	Description	Action	Status	Compliance Date
Part III – 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	The following is posted to the WNH Careers page: “If you are selected to participate in the recruitment process for the position to which you have applied and require a disability-related accommodation, please notify Human Resources.” Accommodations are available for all parts of the recruitment and selection process. Applicants need to make their required accommodations known in advance.	Completed	January 1, 2016
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. 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.	WNH notifies every applicant selected for a job interview that we are AODA compliant and asked to advise us in advance of any accommodations required.	Completed	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
24	Notice to successful applicants	24. Every employer, shall when making offers of employment, notify the successful applicant of its process for accommodating employees with disabilities.	WNH terminology part of current letter template	Completed	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.	All employees will be trained on IAS policy during orientation Refresher training scheduled to be completed by Dec. 31/18	Completed	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	New employees will receive training during orientation.	Completed Integrated into safety orientation training for new employees	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.	When the IAS policy is changed, all employees are to review and acknowledge they have read and understand the document.	Completed	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
26	Accessible formats and communication supports for employees.	26.1 In addition to its obligations under section 12, where an employee with a disability requests accommodation, 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; b) information that is generally available to employees in the workplace.	Will provide or arrange to provide accessible formats and communication supports to employees who request it.	Completed	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.	WNI will consult with employee to determine a suitable format or communication support	Completed Will consult with employee upon request	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 tot to the employee’s disability.	WNI will develop an individual emergency plan that considers various emergencies when made aware of a disability.	Completed Individualized Emergency Response Template available	January 1, 2012



Section	Initiative	Description	Action	Status	Compliance Date
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 response information to the person designated by the employer to provide assistance to the employees	Provide Emergency Response to the person designated to provide assistance, with the employee's consent.	Completed	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.	Provide Individual Response Information in a timely manner, once WNH is made aware of the disability	Completed	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	Review Individual Emergency Plans as required	Completed	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.	No formal policy exists however, individual plans were created as required WNH will create a policy to develop accommodation plans as required by Jun. 1/18	Ongoing	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
28		<p>28(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 the 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 the account the employee's accessibility needs due to disability. 	WNH will include all criteria when completing the policy.	To be completed by Jun 1, 2018	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
29	Return to Work Process	29. (1) Every employer, other than an employer that is a small organization, 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	This is exists within the current WNH Return to Work Policy and Procedures	Completed	January 1, 2016
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 were absent because their disability required them to be away from work; b) use individual documented accommodation plans, as described in section 28 as part of the process.	Current process takes into account AODA requirements.	Completed	January 1, 2016
29		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.		Completed	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
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 to employees with disabilities.	All supervisors were given this information during Accessibility training. New employees are advised during Accessibility training.	Completed	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 employees with disabilities, as well as individual accommodation plans, when providing career development and advancement to its employees with disabilities.	All supervisors received this information during Accessibility training. New employees are advised during Accessibility training.	Completed	January 1, 2016
32	Redeployment	32. (2) An employer that uses redeployment shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities	Part of WNH current process	Completed	January 1, 2016