



2014 - 2016

Multi-Year Accessibility Plan

IMT Partnership

Available in Accessible Formats

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Introduction

In 2005, the government of Ontario set the goal of creating a barrier-free Ontario for people with disabilities by 2025 by creating the *Accessibility for Ontarians with Disabilities Act* (“AODA”).

To reach this goal, the Ministry of Community and Social Services (the “Ministry”) has created Regulations that set out the actions that organizations must take to meet this goal and the deadlines they must follow in doing so. The Regulations cover accessibility standards in customer service, information and communications, employment, transportation and the built environment.

IMT Partnership (“IMT”) is committed to playing its part in helping Ontario become a more accessible province for all individuals. Our organization’s Ontario based facilities and offices will comply with the standards under Regulation 429/07 – Accessibility Standards for Customer Service – by creating internal policies, practices and procedures to ensure our members recognize the role they play in making Ontario more accessible. These initiatives include the creation of a training program for all IMT members on the *AODA* and providing accessible services.

This multi-year accessibility plan has been created to communicate our planned initiatives and their intended completion dates in accordance to the organizational obligations under the *AODA*. We are committed to meeting these goals on or before the required dates to demonstrate our commitment to removing barriers that exist for persons with disabilities.

The accessibility standards regarding the built environment are currently in development by the Ministry and will come into full effect on January 1, 2015 along with amendments to Ontario’s Building Code. IMT will meet these standards once they are released should any facilities or offices located in Ontario undergo major renovations or new construction.

Statement of Commitment

IMT is committed to treating all individuals in a way that allows them to maintain their dignity and independence, as evidenced by our *Employment Equity Policy, Violence and Harassment Policy and Programs*, and *Accessibility Policy*. We believe in integration and equal opportunity. We are committed to meeting the needs of individuals with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and its Regulations.

Integrated Accessibility Standards Regulation (IASR)

The multi-year accessibility plan is a tool for IMT to communicate its accessibility initiatives internally and to the public and improve opportunities for people with disabilities. This plan will be reviewed on an annual basis and will be supplemented by the Accessibility Compliance Report. This multi-year accessibility plan will be provided in an accessible format available to anyone upon request and available on our website. The attached chart outlines the planned initiatives for IMT's Ontario based facilities and offices for the years 2014 through 2016, and the deadlines for completion of each initiative.

Multi-Year Accessibility Plan

General Requirements – Section 3 – Accessibility Policy

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: <u>January 1, 2014</u>		
	Deliverables	Action Plan	Status
3.1 – Establish Accessibility Policies	Accessibility policies in accordance with the IASR are developed, implemented and maintained.	Accessibility Policy is established to incorporate new requirements, practices and procedures as required.	Complete
3.2 – Statement of organizational commitment	Statement of organizational commitment to meet the accessibility needs of persons with disabilities.	Will be included in accessibility policy and multi-year accessibility plan.	Complete
3.3 – Make policy documents publically available	Written policy documents are publicly available and in accessible format upon request.	Accessibility Policy will be posted on websites and will be available in accessible formats upon request.	In Progress

General Requirements – Section 4 – Multi-Year Accessibility Plan

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: <u>January 1, 2014</u>		
	Deliverables	Action Plan	Status
4.1 – Establish multi-year accessibility plan	A multi-year accessibility plan outlining strategies to identify and remove barriers for people with disabilities is established, implemented, maintained and documented.	Accessibility plan will be created and updated on an on-going basis.	Complete
4.1 – Post accessibility plan on Website	The accessibility plan is posted on the website and provided in an accessible format upon request.	The plan will be posted on external web site and will be available in accessible formats upon request.	In Progress
4.1 – Review accessibility plan	The plan is reviewed and updated at least once every 5 years.	The plan will be reviewed and updated annually. A new plan will be posted every five years or whenever there are significant changes.	Ongoing

General Requirements – Section 7 - Training

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: <u>January 1, 2015</u>		
	Deliverables	Action Plan	Status
7.1 - Provide training on IASR and Human Rights Code	All employees, volunteers, persons who develop policies, and persons who provide goods, services or facilities on behalf of the organization receive IASR and Human Rights training.	Training will be incorporated into orientation program which will be assigned to all new employees. Standard contractors will be required to review policies and sign off on them. Employees will be required to complete training and sign off on policies.	In Progress
7.2 - Training is appropriate to duties	Training is appropriate to the duties of the employee.	Where appropriate, key employees will be provided with additional training, specific to their job, e.g. HR and Customer Service.	In Progress
7.3 - As soon as practicable	Training is delivered as soon as practicable.	Training will be delivered at orientation for new hires and as soon as possible for current employees.	In Progress
7.4 - Training regarding policy changes	Training with respect of any changes to the accessibility policy described in Section 3 is provided.	The content of the training will cover the changes made to the material in section 3.	Ongoing
7.5 - Record of training	A record of training, including dates of training, and those present, will be kept.	Human Resources will keep records of training in the employee's training file.	Ongoing

Information and Communication Standards – Section 11 - Feedback

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: <u>January 1, 2015</u>		
	Deliverables	Action Plan	Status
11.1 - Feedback process	Ensure online feedback processes are provided as accessible upon request.	Current feedback process will be enhanced to improve accessibility. The HR and Marketing departments will ensure the process meets accessibility standards.	In Progress

Information and Communication Standards – Section 12 – Accessible Formats

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
12.1 - Provide accessible formats and communication supports	Accessible formats and communication supports will be provided in a timely manner that takes into account the person's accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.	The request will be documented and the format needed confirmed. A process will be developed to meet this requirement.	Ongoing
12.2 - Consultation	Consultation will occur with the person requesting alternate formats.	A form will be developed to assist with the consultations.	In Progress
12.3 - Notification of public	The public will be notified of the availability of accessible formats.	A general statement of availability will be posted on the website and intranet.	In Progress

Information and Communication Standards – Section 14 – Website Accessibility

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2021		
	Deliverables	Action Plan	Status
14.1 - Websites	Ensure websites and web content conform to WCAG 2.0 guidelines (Web Content Accessibility Guidelines) at the following levels: New websites and web content to Level A by January 1, 2014. All websites and web content to Level AA by January 1, 2021 (other than live captions and audio descriptions).	Marketing and IT departments will be notified of this requirement. Intranet and external websites are required to be updated. IMT will comply with WCAG 2.0 Level A requirement guidelines by January 1, 2015 for company websites created after 2012.	In Progress

Employment Standards – Section 22 – Recruitment

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
22 - Recruitment Process	All employees and the public are notified about the availability of accommodation for applicants with disabilities in the recruitment process.	Availability of accommodation will be offered on all job postings, internal and external.	Ongoing

Employment Standards – Section 23 - Selection

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
23.1 - Recruitment Selection	Notify selected job applicants of the availability of accommodations upon request, in relation to the materials or processes used for selection, in a manner that takes into account the applicant's accessibility needs.	All job postings will include information for requesting accommodation or assistance. All applicants invited for interviews will be asked if they require assistance or accommodation.	Ongoing
23.2 - Employee Consultation	Consultation with applicants will occur to determine suitable formats or communication supports.	Process and questionnaire will be developed and implemented.	Ongoing

Employment Standards – Section 24 – Offers of Employment

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
24 - Offers of Employment	Notify successful applicants of company policies for accommodating employees with disabilities.	Employment offers will notify the successful applicant of the availability for accommodation and policies in accessible formats.	Ongoing

Employment Standards – Section 25 – Accessibility Policy

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
25.1 - Policy Notification	Inform employees of policies supporting employees with disabilities.	The <i>Accessibility Policy</i> will be communicated to all current employees.	In Progress
25.2 - Hire Notification	Provide accommodation information to new employees as soon as practicable after hiring.	New employee orientation will include training on the <i>Accessibility Policy</i> .	Ongoing
25.3 - Policy Changes	Provide updated information on accommodations policies to employees when changes occur.	Changes to the <i>Accessibility Policy</i> will be communicated to all employees.	Ongoing

Employment Standards – Section 26 – Communication Supports

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
26.1 - Accessible Format and Communication Supports	Accessible formats and communication supports for job or workplace information will be available.	Review and update current Policies and Procedures for the provision of job accommodations.	In Progress
26.2 - Employee Consultation	Consultation with employees will occur to determine the suitability formats or communication supports.	Review and update current Policies and Procedures for the provision of job accommodations. This will include a consultative process.	In Progress

Employment Standards – Section 27 – Emergency Response Plan

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: <u>January 1, 2014</u>		
	Deliverables	Action Plan	Status
27.1 - Individual Workplace Emergency Response	Provide individualized workplace emergency response information to employees who have a disability.	HR will give the opportunity for employees with disabilities to identify themselves in order to provide them with an individualized workplace emergency plan. Accessible formats will be provided upon request.	In Progress
27.2 - Designated Persons	Provide information to person designated to provide assistance upon consent.	Assistance will be provided upon request and consent. The designated person will be an HR representative.	Ongoing
27.3 - Timely Manner	Provide information as soon as practicable after becoming aware of the need.	Individualized workplace emergency plan will be provided as soon as possible after the employer becomes aware of the need.	Ongoing
27.4 - Review	Review individualized workplace emergency response information when: employee moves locations, individual plans are reviewed, general emergency occurs.	Plans will be reviewed if an employee moves locations, individual plans are reviewed, general emergency occurs.	Ongoing

Employment Standards – Section 28 – Individual Accommodation Plans

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
28.1 - Written Process	Develop written process for documented individual accommodation plans.	Company will review any existing accommodation plans and identify elements of AODA requirements that need to be incorporated. A process for documenting individual accommodation plans will be developed.	In Progress
28.2 - Prescribed Elements	Include prescribed elements in process: how can employee participate, how employee will be assessed, how employer can request assessment to determine accommodation, how employee's personal information will remain private, how often plan will be reviewed and updated, how reasons for denied request will be communicated, how plan will be provided to employee	Prescribed elements will be included in written process for documenting individual accommodation plans.	In Progress
28.3 - Individual Accommodation Plans	Individual accommodation plans shall provide information regarding accessible formats and communication supports provided, individualized workplace emergency response information, and identify any other accommodation that is to be provided	Individual accommodation plan format will be created.	In Progress

Employment Standards – Section 29 – Return to Work

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
29.1 - Written Process	Develop a documented return-to-work process.	Review existing <i>Early and Safe Return to Work Program</i> and revise as necessary to include AODA requirements.	In Progress
29.2 - Process Steps	Include steps employer will take to facilitate return to work and use documented individual accommodation plans.	Review existing processes and revise as necessary to include AODA requirements	In Progress

Employment Standards – Section 30 – Performance Management

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
30 - Performance Management Process	The use of the performance management process takes into account the accessibility needs of employees with disabilities, including existing accommodation plans.	Review existing performance management systems and revise as necessary to include AODA requirements.	In Progress

Employment Standards – Section 31 – Career Development

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
31 - Career Development	Include accessibility considerations and individual accommodation plans in career development and advancement, including additional responsibilities within current position.	Accommodate individuals with respect to career development and advancement ensuring the appropriate assistive aids are provided.	Ongoing

Employment Standards – Section 32 – Redeployment

AODA Standards Regulation	Accessibility Policies Compliance – Deadline: January 1, 2016		
	Deliverables	Action Plan	Status
32 - Redeployment Process	Include accessibility considerations and individual accommodation plans in redeployment processes.	A review of current <i>Early and Safe Return to Work Program</i> will be completed to include accessibility considerations.	In Progress

Conclusion

This plan will be available on IMT's website (<http://imtcorporation.com>) and information about its release will be communicated to all employees via email and facility communication boards. IMT is committed to Ontario's goal of creating a barrier-free Ontario by 2025 and will work diligently to ensure we meet our targets. We encourage feedback on our multi-year plan and will provide feedback responses in accessible formats upon request, please contact us with your suggestions, comments or concerns.

Contact Information

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