

**Introduction:**

In 2005, the Ontario Government passed the Accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be an accessible province by 2025. It has introduced a phased-in approach to the implementation of requirements through regulations under AODA. To help public, private and not-for profit organizations identify, prevent and remove barriers to accessibility, the AODA sets out specific accessibility standards in five areas: Customer Service, Information and Communications, Employment, Transportation, and Design of Public Spaces.

**Our Commitment:**

OBSI is committed and guided by the four core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the Ontario Human Rights Code and the AODA. We support this commitment by working to prevent and remove barriers to accessibility.

OBSI will take the following steps to prevent and remove accessibility barriers:

SECTION	INITIATIVE	ACT DESCRIPTION	ACTION	COMPLIANCE STATUS
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. (2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies.	<ul style="list-style-type: none"><li>• Accessibility Policy has been developed.</li><li>• Statement of Organizational Commitment has been developed.</li><li>• The policy is available on the company intranet.</li><li>• We will provide a copy of our Accessibility Policy to any person who requests one.</li><li>• The Accessibility Policy, Statement of Commitment or any other information included in the Employee Manual and are available in accessible formats on request.</li></ul>	Completed
4	Accessibility Plans	4(1) The Government of Ontario, Legislative Assembly, designated public sector organizations and 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;	<ul style="list-style-type: none"><li>• Multi-year Accessibility Plan has been developed outlining OBSI's strategy to preventing and removing Accessibility barriers.</li><li>• This has been posted on the company website and company intranet.</li><li>• This Multi-year Accessibility Plan is available in an accessible format on request.</li></ul>	Completed.  The multi-year plan will be reviewed and updated as required, at least every 5 years.

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		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.		
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.	<ul style="list-style-type: none"> <li>• Training has been provided to all Ontario employees.</li> <li>• We will continue to provide ongoing training for new employees and for policy and/or legislative changes. Note: New employees review presentation during onboarding and via online training every two years. Next session Jan/Feb 2024.</li> </ul>	Completed and ongoing
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.	<ul style="list-style-type: none"> <li>• OBSI ensures that its processes for receiving and responding to feedback are accessible to people with disabilities, and OBSI will continue to provide accessible formats and communication supports upon request.</li> </ul>	Completed
12	Accessible Formats and 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. (2) The obligated organization shall consult with the person making the request in determining the	<ul style="list-style-type: none"> <li>• OBSI will continue to, upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs.</li> <li>• Our company website has been updated to notify the public about the availability of accessible formats and communication supports upon request.</li> </ul>	Completed

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		suitability of an accessible format or communication support. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.		
14	Accessible Websites and 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.	<ul style="list-style-type: none"> <li>• Our IT and Marketing teams have been informed of the requirement to make our internet websites and web content to conform to the WCAG 2.0, Level AA.</li> <li>• Marketing Department to plan and ensure that all website content conforms to WCAG 2.0 Level AA.</li> <li>• Any new websites to be developed in the future would be built as per the WCAG 2.0 Level AA requirements.</li> </ul>	In progress (OBSI to upgrade website in 2024 including all WCAG 2.0 Level AA requirements)
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.	<ul style="list-style-type: none"> <li>• Our Recruitment process has been reviewed and updated to ensure we are communicating effectively and consistently to employees and the public about the availability for accommodation for applicants with disabilities.</li> </ul>	Completed
23	Recruitment, Assessment or Selection	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.	<ul style="list-style-type: none"> <li>• Our Recruitment process has been reviewed and updated to ensure we are communicating effectively and consistently to 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 process followed.</li> </ul>	Completed

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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.	<ul style="list-style-type: none"> <li>• Our Offer process has been reviewed and updated to ensure successful applicants are notified of our policies for accommodating employees with disabilities.</li> </ul>	Completed
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 accommodations that take into account an employee 's accessibility needs due to disability.</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>(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.</p>	<ul style="list-style-type: none"> <li>• We have developed an Accessibility policy which has been included in our Employee Manual. We review and update as required our Employee Manual annually.</li> <li>• All new employees are provided with a copy of the Employee Manual upon hire. Guidelines are available on our internal intranet for employees to review at any time.</li> </ul>	Completed
26	Accessible Formats and 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. O. Reg. 191/11, s. 26 (1).</p> <p>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> <li>• As described in our Accessibility Policy, OBSI will upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, taking into account the person's accessibility needs.</li> </ul>	Completed

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27	Workplace Emergency Response Information	<p>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> <p>(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.</p> <p>(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.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee 's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies.</p>	<ul style="list-style-type: none"> <li>• Updated Emergency Preparedness Plan to incorporate this into the Plan.</li> <li>• Employee Emergency Evacuation Self-Assessment form developed and included in the Employee Guidelines for employees to complete who require assistance during an evacuation due to a temporary or permanent disability.</li> <li>• Employee Guidelines highlight under the Emergency Preparedness Plan section that, upon request, individualized plans will be developed to accommodate those individuals needing individual accommodation due to a temporary or permanent disability. This will be reviewed if an employee moves to a different location in the organization, when the employee's overall accommodation needs, or plans are reviewed or when we review our general emergency response policies.</li> <li>• Cadillac Fairview Emergency Preparedness Plan specifies details on evacuation for people who require assistance on company intranet under Health and Safety.</li> </ul>	Completed
28	Documented Individual Accommodation Plans	<p>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.</p> <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p>	<ul style="list-style-type: none"> <li>• This is outlined in our Accessibility policy.</li> </ul>	Completed

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		<p>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>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.</p> <p>4. 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>5. The steps taken to protect the privacy of the employee 's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. 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>(3) Individual accommodation plans shall,  (a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p>		

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		(b) if required, include individualized workplace emergency response information, as described in section 27; and (c) identify any other accommodation that is to be provided.		
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. (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; and (b) use individual documented accommodation plans, as described in section 28, as part of the process. (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.	<ul style="list-style-type: none"> <li>OBSI already has in place a return-to-work process that incorporates this.</li> </ul>	Completed
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 of employees with disabilities.	<ul style="list-style-type: none"> <li>As highlighted in our Accessibility Policy, OBSI will continue to take into account the accessibility needs of employees with disabilities, as well as their individual accommodation plans, when using its performance management process in respect of employees with disabilities.</li> </ul>	Completed

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		(2) In this section, —performance management means activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success.		
31	Career Development and Advancement	<p>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.</p> <p>(2) In this section, —career development and advancement includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.</p>	<ul style="list-style-type: none"> <li>As highlighted in our Accessibility Policy, OBSI takes into account the accessibility needs of employees with disabilities and their accommodation plan when providing career development and advancement for an employee.</li> </ul>	Completed
32	Redeployment	<p>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> <p>(2) In this section, —redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.</p>	<ul style="list-style-type: none"> <li>OBSI takes into account the accessibility needs of employees with disabilities and their accommodation plan when redeploying an employee.</li> </ul>	Completed



**Feedback Process:**

Customers who wish to provide feedback on the way OBSI provides services to people with disabilities can call, write, email or use our online form. All feedback will be directed to the Client Services Manager. Customers will hear back within two business days.

We can also be reached at:

OBSI  
20 Queen Street West,  
Suite 2400, P.O. Box 8  
Toronto ON M5H 3R3

Toll-free phone: 1-888-451-4519

Fax: 1-888-422-2865

TTY: 1-844-358-3442

Email: [ombudsman@obsi.ca](mailto:ombudsman@obsi.ca)

Online: [www.obsi.ca](http://www.obsi.ca)

If you would like additional information regarding the accessibility plan, or if you require an accessible format of this plan, please contact us with your request by one of the same communication methods listed above for our feedback process.