



Accessibility for Ontarians with Disabilities Act, 2005

Issued December 2014; rev. Dec/15; Dec/17

INTEGRATED ACCESSIBILITY STANDARDS – Statement of Commitment & Multi-Year Plan

The Real Estate Council of Ontario (RECO) is committed to meeting the objectives and requirements outlined in the Accessibility for Ontarians with Disabilities Act, 2005 and the applicable regulations, and to meeting the accessibility needs of persons with disabilities in a timely manner, through the implementation of the requirements of the Act and its applicable regulations.

Accessibility for Ontarians with Disabilities Act, 2005 (“AODA”)

The AODA develops, implements, and enforces accessibility standards so that goods, services, facilities, accommodation, employment, buildings, structures, and premises are accessible to persons with disabilities. The AODA intends to achieve an accessible Ontario by Jan 1, 2025. To do so, mandatory and enforceable standards have been implemented. The Standards include:

Customer Service Standard – Ontario Regulation 429/07

The Customer Service Standard (Ontario Regulation 429/07) was the first standard under the AODA to become law. It ensures that people with disabilities can receive goods and services in a manner that takes into account one’s disability. Requirements include development of a policy, practices, procedures as well as the provision of training for staff and volunteers. RECO submitted compliance reports to the Province indicating we had addressed the requirements of the Regulation and were meeting the compliance obligation. We will continue to ensure compliance with the Customer Service Standard. We developed feedback processes to respond to inquiries and suggestions received by phone, email, mail, in person. This has been communicated to internal and external stakeholders.

Integrated Accessibility Standard Regulation (IASR) – Ontario Regulation 191/11

The IASR brings together the following standard areas in one Regulation: Information and Communication, Employment, Built Environment and Transportation. The Built Environment and Transportation Standards do not apply to us. General requirements common to all standard areas include policy development and training (on the



requirements of the IASR and the Ontario Human Rights Code). The requirements have staggered compliance dates up to the year 2021.

RECO Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan – Development Process

Senior Management reviewed the requirements of the IASR to ensure RECO achieves or will achieve accessibility through meeting the IASR’s requirements. The Multi-Year Accessibility Plan was developed in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA.

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies, practices and procedures	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.	Develop accessibility policy; Make available to public (via RECO website). Provide the policy in alternative formats on request. Review annually. Train employees	CS Policy Complete Ongoing Ongoing Ongoing	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall, 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; post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and review and update the accessibility plan at least once every five years.	Attended various public workshops and started working on draft. Identified barriers in collaboration with various departments (IS, COMM, EDU). Sr. Mgmt approved HR will review Jan 1, every year	Complete. Complete. Complete Ongoing	January 1, 2014



Section	Initiative	Description	Action	Status	Compliance Date
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.	<p>Serve-Ability training completed for all Employees, Contract Workers, Board Directors, Volunteers.</p> <p>Training forms part of onboarding process for new hires.</p> <p>Focused half-day workshops conducted for front-line employees dealing directly with customers.</p> <p>Separate training conducted for management.</p> <p>Determine method of refresher training and number of training levels. Classroom, e-learning or blended?</p> <p>Roll-out combined OHRC & AODA training.</p>	<p>Complete.</p> <p>Ongoing</p> <p>Ongoing</p> <p>Complete.</p> <p>Ongoing</p> <p>Ongoing</p>	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.	Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured.	Ongoing	January 1, 2015
			Determine what accessible formats and communication supports we will provide upon request	Ongoing	
			Ensure staff and management are aware of the need to accommodate upon request. Requests to be directed to Manager, Administration & Human Resources.	Ongoing	
			Part of ongoing training.	Ongoing	
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.	Determine what accessible formats and communication supports we will provide to persons with disabilities upon request. Ensure these formats and supports can be provided in a timely manner (ex. Same time, day, 24 hours) Communicate to staff and management that no <u>additional</u> charge is required	Complete & Ongoing	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
			or borne by the requester. Part of training.		
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.	Communicate to staff and management this requirement through training. Requests directed to Manager, Administration & Human Resources. Develop protocol for situations where a suitable agreement cannot be made	Complete & Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Have a sign posted in Reception area. Post on website (included in Policy). Include notice on certain print materials.	Complete & Ongoing	January 1, 2016
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.	Attend workshop on Accessible Websites (IS / Communications) Sourcing vendors and pricing to develop accessible website (new website). Continuously review WCAG guidelines to be informed of changes and updates	Ongoing Ongoing Ongoing	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. 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.	<p>Include a statement in job posting stating our commitment in providing accommodations for persons with disabilities. Example: <i>We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs.</i></p> <p>Identify where we advertise: paper, website, bulletin boards?</p>	<p>Complete</p> <p>Ongoing</p>	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>Notify applicants (telephone, email, letter, etc) based on required accommodations advised.</p> <p>HR Generalist is designated as the contact person to handle queries regarding accessibility.</p> <p>Identify barriers: location of interview room, format of tests, room set-up for in-person interviews, interviewing timelines, supports, paperwork, etc.</p> <p>Develop interview script guidelines</p> <p>Develop Accessible Interviewing Checklist.</p>	<p>Complete & Ongoing</p>	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.	<p>Put a statement in hire letter/agreement notifying applicant of our accommodation policies.</p> <p>Example: <i>We are committed to providing accommodations for</i></p>	Complete	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
			<i>persons with disabilities. If you require accommodation, we will work with you to meet your needs."</i>		
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.	Circulate policy, training and staff announcements (via email, brochures, posters). Expand Sec.16. Employee Handbook Obtain Employee Acknowledgement	Ongoing	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.	Upon hire. Add Accessibilities Policies to Employee Handbook Expand Sec.1.6 Reasonable Accommodation	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.	See 25 (1)	Ongoing	January 1, 2016
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,	Functional audit of information specific to departments. Audit of regular communications.	Ongoing	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
		<p>information that is needed in order to perform the employee's job; and</p> <p>information that is generally available to employees in the workplace.</p>			
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	List what the employee will require – i.e. Policy, communication supports that are available (text-to-speech, braille, large print, accessible PDFs, plain language versions, closed captioning).	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>Develop process.</p> <p>Workplace Emergency Response Plan. Issue reminders to staff quarterly.</p> <p>Individual Persons Requiring Assistance Form; quarterly calls for update.</p> <p>Identification of Potential Barriers During an Emergency Response</p>	<p>Complete.</p> <p>Ongoing review.</p>	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.	Part of process with employee's consent.	Complete.	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as	Part of process	Complete.	January 1, 2012



Section	Initiative	Description	Action	Status	Compliance Date
		practicable after the employer becomes aware of the need for accommodation due to the employee's disability.			
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.	Part of process	Complete.	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.	Develop expanded process.	Complete & Ongoing	January 1, 2016
28		28 (2) The process for the development of documented individual accommodation plans shall include the following elements: The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. The means by which the employee is	Include: Overview Accommodation Process; Individual Accommodation Plan Functional Capacity Assessment Form	Complete & Ongoing	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
		<p>assessed on an individual basis.</p> <p>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>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>The steps taken to protect the privacy of the employee's personal.</p> <p>The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>The means of providing the individual accommodation plan in a format that takes into</p>			



Section	Initiative	Description	Action	Status	Compliance Date
		account the employee's accessibility needs due to disability.			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>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>shall document the process.</p>	<p>Review current process to ensure it meets requirements.</p> <p>Updated Accommodation & Return to Work policy.</p> <p>Add to Employee Handbook</p>	Complete & Ongoing	January 1, 2016
29		<p>29. (2) The return to work process shall,</p> <p>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>use individual documented accommodation plans, as described in section 28, as part of the process.</p>	<p>Review current process to ensure it meets requirements, including review of Job Task Analysis form.</p>	Complete & Ongoing	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>Include in current process checklist.</p>	Ongoing	January 1, 2016
30	Performance Management	<p>30.(1) An employer that uses performance</p>	<p>Review current process keeping individual</p>	Ongoing	January 1, 2016



Section	Initiative	Description	Action	Status	Compliance Date
		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.	accommodation plan in mind.		
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.	Review current process keeping individual accommodation plan in mind.	Ongoing	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.	Review current process keeping individual accommodation plan in mind.	Ongoing	January 1, 2016