

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

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.	<ul style="list-style-type: none"> Policy drafted and approved by the Board of Directors June 25th, 2014 	Completed	January 1, 2015
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<ul style="list-style-type: none"> Attended workshop Form a committee to determine all barriers at each location Verify with IT/Manager as to what is required to add to the website. Timeframes required. Once completed, diarize to review annually, beginning January 2016. 	<p>Completed</p> <p>Completed</p> <p>Completed</p> <p>Ongoing</p>	January 1, 2015

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.	<ul style="list-style-type: none"> • We have identified all kiosk and ATMs, and will account for accessibility when purchasing or replacing these in the future. 	Ongoing	January 1, 2015
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, <ul style="list-style-type: none"> (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"> • Prolearning worked with CU-Source and developed employee and manager training courses. KCCU has committed to using this training for all staff and will be completed by December 31, 2014 • Additional (Higher level) training for Supervisors and Managers • We customized a training program from the CU-Source training for board members and volunteers. • All employees and volunteers (including Board Members) must be trained on the IAS – NO EXCEPTIONS • Board and un-paid co-op students can have a detailed, condensed version of training and have them sign off on the training • Consider training annually for all staff for consistent understanding. 	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.	<ul style="list-style-type: none"> • This differs from the Customer Service Feedback • Conduct a review of all feedback processes both internally and externally, used to communicate (ex. telephone, mail outs (Marketing), surveys, newsletters, memos, etc) • Identify how we collect feedback (forms of feedback used) • Need to be able to offer these in alternate formats if requested. 	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.	<ul style="list-style-type: none"> • Similar to the Feedback section, any information and communication both internally or externally, needs to be available and provided in alternate formats upon request • Identify what are our ‘go-to’ alternatives • Identify what kind of information would be asked for and how is it asked 	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.	<ul style="list-style-type: none"> • Communicating with staff and management of this requirement and how to handle it if they receive it. What is our process/protocol to handle this 	Ongoing	January 1, 2016

12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<ul style="list-style-type: none"> Statement communicating that any and all information is available in alternative format, upon request. Post online and post signs in the branches. Identify all ways to notify the members that all information is available in an alternative format 	Ongoing	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.	<ul style="list-style-type: none"> Not applicable to KCCU (Only applies if we have an existing public safety policy. If not, this doesn't apply) Internal safety information (emergency fire procedures) would be available to staff in an alternative format upon request 	N/A Completed	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.	<ul style="list-style-type: none"> • Consult with IT as they need to be involved. (Memberdirect as well) • If you have done a significant “refresh” of the website between 2012 and 2014, the website must meet 2.0 Level A standards (Colours, logo, etc). • If no significant changes in that time frame, then any new content must be accessible going forward (word, PDF etc are accessible). All new materials added must meet 2.0 Level A Compliance • By 2021, EVERYTHING must meet 2.0 Level AA 	Ongoing. Consulted with the IT department. Website was updated in 2016 and meets WCAG 2.0 Level A requirements.	<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,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded).
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15	Educational & Training Resources & Materials	<p>15(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <ol style="list-style-type: none"> 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, <ol style="list-style-type: none"> i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format. 2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities. 	N/A	N/A	January 1, 2013
16	Training to Educators	<p>16(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.</p>	N/A	N/A	January 1, 2013

		(2) Obligated organizations that are school boards or educational or training institutions shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.	N/A	N/A	January 1, 2013
17	Producers of Educational or Training Material	17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.	N/A	N/A	January 1, 2015 For accessible or conversion ready versions of textbooks
		(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.	N/A	N/A	January 1, 2020 For accessible or conversion ready versions of printed materials that are educational or training supplementary learning resources.
18	Libraries of educational & training institutions	18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request. (2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).	N/A	N/A	January 1, 2015 For print-based resources or materials January 1, 2020 For digital or multimedia resources or materials

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.	<ul style="list-style-type: none"> Notification to all applicants (Internal/External) by putting a statement on all job postings that we are committed to offering accommodations to any applicant upon request 	Completed	January 1, 2017
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>	<ul style="list-style-type: none"> Notify all candidates that accommodations can be provided upon request Action item is how we are going to do this. Ask each candidate, if there are any accommodations that we need to make... Communicate this with anyone involved in the hiring process Needs to be extended to each person at each stage of the process 	Completed	January 1, 2017
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"> Offer of Employment must state that the Credit Union will accommodate employees if required. We accommodate employees with disabilities 	Completed	January 1, 2017
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.	<ul style="list-style-type: none"> Must communicate internally to all staff that we will accommodate employees with a disability 	Completed	January 1, 2017

25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	<ul style="list-style-type: none"> • Refer to section 24 • Will be incorporated into orientation and new employee training 	Completed	January 1, 2017
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.	<ul style="list-style-type: none"> • Refer to section 25(1) • Any updates / changes will be communicated 	Completed	January 1, 2017
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>	<ul style="list-style-type: none"> • These are specific to employees • Develop a process on how to handle this. • Analyze all job descriptions and determine what would be required; what would be needed to do the job. i.e. headsets • Form a committee to review these • What are all the main jobs • What are the alternatives to successfully do this specific job • Procedural manuals, text to speech devices, • Policies, procedures, guidelines, brochures, newsletters 	Completed	January 1, 2017
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • We will consult with the individual making the request and determine the suitable format • What are the communication aids and formats that we would be prepared to offer, or can offer 	Completed	January 1, 2017

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.	<ul style="list-style-type: none"> • Add to the hiring package • Gathered from all employees • Meet with employees who require assistance in emergency situations • Accommodations logged – who owns the responsibility, where does documentation go? 	Completed	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.	See Section 27. (1)	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.	See Section 27. (1)	Completed	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, <ul style="list-style-type: none"> (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. 	See Section 27. (1)	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.	<ul style="list-style-type: none"> Investigate the need for a written process in place for employee plans 	Completed	January 1, 2017
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"> 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 assessed on an individual basis. 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. 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. The steps taken to protect the privacy of the employee's personal. 	<ul style="list-style-type: none"> Must establish a written process and put it in place for documenting accommodation plans for employees (Individual Accommodation Plan) Put a copy of the plan in the employee's personnel file 	Completed	January 1, 2017

		<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>			
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>	<ul style="list-style-type: none"> • As outlines/directed from the Co-Operators. • Return to work is driven by LTD provider, and we must ensure that all documentation from the provider is received and kept in the employee file to support the individual accommodation plan and return to work • need to know what is required to accommodate that employee coming back to work • need to make a return to work process for that individual 	Completed	January 1, 2017

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>		Completed	January 1, 2017
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>		Completed	January 1, 2017
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>	<ul style="list-style-type: none"> • Thread accessibility into performance management, taking into account accommodation requirements and/or disability 	Completed	January 1, 2017
31	Career Development & 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>	<ul style="list-style-type: none"> • Same as section 30 	Completed	January 1, 2017
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>	<ul style="list-style-type: none"> • Same as section 30 	Completed	January 1, 2017

