

GGFL - Accessibility for Ontarians with Disabilities Act - (AODA)
Integrated Accessibility Standards
Multi-year plan – Reviewed May 2019

Part 1 – General Requirements:

Compliance Date:	Section	Requirements:	Description:	Action(s):	Status
Jan. 1, 2014	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"> - Created/posted Customer Service Policy on GGFL website (HR/Marketing) - GGFL Accessibility policies are available to the public upon request and available on the website (Marketing) - Published/posted GGFL’s statement of commitment on website (HR/Marketing) 	Complete
	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 meets 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"> - Established multi-year plan; posted to website; (HR/Marketing) - Available in accessible formats, upon request (e-mail; large print) (Marketing) - To be reviewed once every five years (HR) 	Complete
Jan. 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"> - Reviewed/provided training (online) on AODA, H&S, and the Human Rights code. (HR) - Determined the appropriate level(s) of training required for different 	Complete

			<p>a) All employees, and volunteers;</p> <p>b) All persons who participate in developing the organization's policies; and</p> <p>c) All other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>groups/levels within GGFL. (HR/Management)</p> <p>- Training is part of onboarding orientation (HR/Management)</p>	
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Part 11 – Information and Communications Standards

Compliance Date:	Section	Requirements:	Description:		Status
Jan. 1, 2015	11	Feedback	11. (1) Every obligated organization that has a process 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.	- Determined what accessible formats can be provided upon request. (Operations)	Complete
Jan. 1, 2016	12	Accessible Formats & Communication Supports	<p>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,</p> <p>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p> <p>12. (2) The obligated organization shall consult with the person making the request to determine the suitability of an accessible format or communication support.</p> <p>12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>- Determined what formats or comm. supports GGFL can provide. (Operations)</p> <p>- Determined minimal options available in a timely manner (Marketing/Operations)</p> <p>- No additional charges for alternate formats (COO/Partners/Managers)</p> <p>- Utilized website and/or individual requests. (Marketing/Partners/Managers/HR)</p>	Complete

Jan. 1, 2014	14	Accessible Websites & Web Content	14. (2) Designated public sector organizations and large organizations shall make their internet website 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.	- Worked with consultants to ensure compliance (Marketing/IT) - Ongoing consultations to ensure new changes to website conform to standards as required (Marketing/IT)	Complete
Jan. 2, 2021 conform with WCAG 2.0 Level AA).					

Part 111 – Employment Standard

Compliance Date:	Section	Requirements:	Description:	Action(s):	Status
Jan. 1, 2016	22	Recruitment - Generals	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	- Prospective applicants advised of accommodation during recruitment and onboarding (internal/external postings) (HR/Marketing)	Complete
Jan. 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 a selection process, that accommodations are available upon request in relation to the materials or process 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 the disability.	- Applicants are notified of accommodations during the recruitment/interview process (HR) Work with individuals to ensure accommodation is provided, up to point of undue hardship (HR/COO)	Complete
Jan. 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.	- Offers of employment include statement of GGFL's accommodation policies. (HR)	Complete
Jan. 1, 2016	25	Informing Employees of	25. (1) Every employer shall inform its employees of its policies used to support its employees with	- Communicated via emails; /handbook/ policies and onboarding process (HR)	Complete

		Supports	<p>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>25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>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.</p>		
January 1, 2016	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 communications supports for,</p> <ul style="list-style-type: none"> a) Information that is needed in order to perform the employee's job; and b) Information that is generally available to employees in the workplace. <p>26. (2) The employer shall consult with the employee making the request in determine the suitability of an accessible format or communication support</p>	- Policies/processes communicated via handbook and on-boarding process/on-going as needed. (HR/Management and Operations)	Complete
Jan. 1, 2016	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</p>	<p>- Identified emergency response needs; individual plans to be implemented as required. (HR/Office Manager/IT and Health and Safety)</p> <p>- On-going as needed</p>	Complete

			<p>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, (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.</p>		
Jan. 1, 2016	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> <p>(a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. b) The means by which the employee is assessed on an individual basis.</p>	<p>-Process developed – to be implemented as needed (HR and/or Operations and Health & Safety)</p> <p>-Developed, based on individual needs as requested (HR)</p>	Complete

			<p>c) 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 an how accommodation can be achieved.</p> <p>d) 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.</p> <p>e) The steps taken to protect the privacy of the employee's personal.</p> <p>f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>h) The means of providing the individual accommodation and in a format that takes into account the employee's accessibility needs due to disability</p>		
Jan. 1, 2016	29	Return to Work Process	<p>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.</p> <p>(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</p>	- Process developed/individual plans implemented based on individual needs (HR/Operations and Health & Safety).	Complete

			<p>them to be away from work; and</p> <p>(b) use individual documented accommodations plans, as described in section 28, as part of the process.</p> <p>(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>		
Jan. 1, 2016	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>	- Reviewed current written/unwritten processes for performance management; communicate/train as necessary. (HR/COO and Management, as necessary).	Complete
Jan. 1, 2016	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>	- Implement process as necessary	Complete
	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>	- Currently not applicable. To continue to review as needed. (HR)	Complete