

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Issued: October 17, 2013

Revised: January 1, 2014, December 2, 2014, December 9, 2015, December 8, 2016, December 12, 2017, December 11, 2018, December 3, 2019

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.	Policy has been reviewed by the Accessibility committee Policy has been approved by HR committee of the Board Policy is posted on the website.	Complete	January 1, 2014
4	Accessibility Plans	4.(1) 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; 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.	Plan has been reviewed by the Accessibility committee Plan has been approved by HR committee of the Board Plan is posted on the website	Complete	January 1, 2014

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.	<p>The Stratford Festival owns two service kiosks.</p> <p>Research is being undertaken to see what technological advances have been made in the U.S. with other Tessitura-based organizations.</p> <p>Any new purchases need to comply with the accessibility requirements; however, none are planned in the near term.</p>	Complete	January 1, 2014
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.	Human rights training and policy incorporated into IAS Employee training.	<p>Complete for current employees</p> <p>Ongoing training required for new employees</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.	Customer processes are already completed If the Stratford Festival implements a feedback process internally, we will need to comply – but we do not currently do this	Complete	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.	Website is updated to identify that the public can request accessible formats. 3 rd party contracts in place for conversion of PDFs, Braille translation	Complete	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.	Process is outlined in HR Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Completed for patron services and job applicants through the website.	Complete	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.	Not applicable, we do not make this information available to the public	Not applicable	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.	New website launched in August 2015 and is in compliance with WCAG 2.0 Level A	Level A is complete	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. (complete)</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).

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.	This information is included in our job postings and on our website.	Complete	January 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 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.	The process is included in HR Policy 2-02B (Employment – Recruitment). The HR Manager will outline when booking interviews with applicants.	Complete	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.	The process is included in HR Policy 2-02B (Employment – Recruitment). Information is included in the contract of employment.	Complete	January 1, 2016

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.	Training was incorporated into IAS employee training. New policies are included in 2016 Employee handbooks and HR policy manuals.	Complete	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.	Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) is summarized in Employee handbooks and provided to all new employees.	Complete	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) above.	Complete	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, (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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016

26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	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.	As of present, no individualized emergency plans are required; regular emergency plans are appropriate. The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete, but subject to ongoing review.	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 27 (1)	Complete	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 27 (1)	Complete	January 1, 2012
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	See 27 (1)	Will respond if required	January 1, 2012

		(c) when the employer reviews its general emergency response policies.			
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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) and the IAP form is included as an Appendix	Complete	January 1, 2016
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"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 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. 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. 5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it 	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) and the IAP form is included as an Appendix	Complete	January 1, 2016

		<p>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>	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) in addition to the Health & Safety Policy 2-06 (Early & Safe Return to Work)	Complete	January 1, 2016
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>	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) in addition to the Health & Safety Policy 2-06 (Early & Safe Return to Work)	Complete	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>	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation) in addition to the Health & Safety Policy 2-06 (Early & Safe Return to Work)	Complete	January 1, 2016

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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016
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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	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.	The process is included in Human Resources Policy 2-02E (Employment – Accessibility & Accommodation)	Complete	January 1, 2016

PART IV – Design of Public Spaces

80.22	Built Environment – Exterior Paths of Travel	80.22 Obligated organizations shall ensure that any exterior paths of travel that they construct or redevelop and intend to maintain meet the requirements set out in this Part. O. Reg. 413/12, s. 6.	When redesigning or building new exterior paths of travel, the Built Environment standards for paths of travel, ramps, stairs, and curb ramps will be met.	Currently reviewing requirements for TPT construction with the architects and new standards will be incorporated	Any build or redesign after Jan 1, 2017 Dec. 3, 2019 Update: The Tom Patterson Theatre will be compliant at time of re-opening in 2020. All other buildings will be compliant after major redesign.
80.32	Built Environment – Off Street Parking	80.32 Obligated organizations shall ensure that when constructing new or redeveloping off-street parking facilities that they intend to maintain, the off-street parking facilities meet the requirements set out in this Part. O. Reg. 413/12, s. 6.	When redesigning or constructing new off-street parking, the Built Environment standards for parking spaces including number and type of spaces, signage, and access aisles will be met.	Currently reviewing requirements for TPT construction with the architects and new standards will be incorporated	Any build or redesign after Jan 1, 2017 Dec. 3, 2019 Update: The Tom Patterson Theatre will be compliant at time of re-opening in 2020. All other buildings will be compliant after major redesign.
80.40	Built Environment – Service Counters	80.40 (1) Obligated organizations shall meet the requirements set out in this Part in respect of the following: 1. All newly constructed service counters and fixed queuing guides. 2. All newly constructed or redeveloped waiting areas. O. Reg. 413/12, s. 6.	When redesigning or constructing new service counters, the Built Environment standards for accessible service counters, fixed queuing lines, and waiting areas will be met.	Currently reviewing requirements for TPT construction with the architects and new standards will be incorporated	Any build or redesign after Jan 1, 2017 Dec. 3, 2019 Update: The Tom Patterson Theatre will be compliant at time of re-opening in 2020. All other buildings will be compliant after

					major redesign.
80.44	Built Environment – Preventative and Emergency Measures	<p>80.44 In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part. 2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6. 	When maintaining or disrupting accessible features or services, the public will be notified through the measures identified in policy A-06 including: on site signage, social media, and the Festival's website. Alternative accessible measures will be provided, where possible.	Complete	January 1, 2017

PART V - Compliance

86.1	Reporting	It is a legal requirement that an organization must submit an accessibility compliance report every three years if the organization is a business or non-profit with 20 or more employees. The compliance report is confirmation that all current accessibility requirements under the Accessibility for Ontarians with Disabilities Act (AODA) have been met.	File an Accessibility Compliance Report	Completed	December 31, 2017
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