

Integrated Accessibility Standards: Multi-Year Accessibility Plan 2022 - 2025

Updated April 2022

AODA Standards	Regulation	Activities or Action(s) to be Taken	Responsibility	Target Date	Status
General Requirements					
Establish and Post accessibility policy	Develop, implement, and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements.	Create an accessibility policy for WES. Link: https://www.wes.org/ca/accessibility-policy/	HR		Completed - April 2017 Revised - June 2021
	Include in its policies a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner.	Incorporate organizational commitment statement into the policy.	HR		Completed - April 2017 Revised - June 2021
	Make the documents publicly available and also ready to be provided in an accessible format upon request.	Post the policy on the WES website.	Marketing/Web		Completed - April 2017 Revised - June 2021
		Review, update, and repost the accessibility policy on WES' website (internet and intranet). Link: https://www.wes.org/ca/accessibility-policy/	HR/Marketing	June 2021	Completed - July 2021
Training	Provide training on the requirements of the accessibility standards and Human Rights Code as it pertains to persons with disabilities.	All employees were provided instructions to take online training modules via accessforward.ca	HR		Completed - April 2017 Completed - May 2021
	Train all employees, policy developers, volunteers, contractors, and Board members on the accessibility policy and requirements.	HR will follow up with anyone who did not submit a record of training. Need to train all third-party customer service representatives (Premiere).	HR HR		Completed - January 2018 Completed - May 2021 Completed - April 2017 Completed - May 2021
	Every person to receive training shall be trained as soon as it is feasibly possible.	Develop a new orientation process to incorporate required accessibility training and associated policies or procedures for all new hires.	HR		Completed - December 2017 Revised - October/November 2021
		Explore with Learning and Development and IT teams whether WES can add AODA training modules to UKG LMS for tracking mandatory training for new hires.	HR	June 2021	Completed October/November 2021
		Compiled training records on file against active employee list as of May 2021 and identified those employees who have not completed training. Communication sent to those employees to complete training by end of May 2021.	HR	May 2021	Completed - May 2021
	A record of training shall be kept including dates on which training was provided and number of individuals to whom training was provided.	Training records will be maintained with details regarding training dates, who took the training, and what training was provided.	HR		Completed - May 2021
Multi-Year Accessibility Plan	Establish, implement, and maintain a document, 'Multi-Year Accessibility Plan, that outlines the strategy to remove and prevent barriers.	Establish project committee to develop plan.	HR/Marketing/Web (Project team)		Completed-October 2017 Revised - April/May 2022
		Draft multi-year accessibility plan for WES.	Project team		Completed - December 2017 Revised - April/May 2022
		Review draft with senior management team for input and approval.	Project team		Completed - December 2017 Revised - April/May 2022
		Post WES' multi-year plan on the website.	Marketing/Web	April/May 2022	Completed - December 2017 Revised - June 2022
	Establish, review, and update accessibility plans in consultation with persons with disabilities and, if established, an accessibility committee.	Consult with JHSC members or persons with a disability about the multi-year plan draft.	HR	Q1 2018 April/May 2022	Ongoing
	Prepare an annual status report on the progress of the plan.	Review and update plan once a year once it is established.	Project team	April/May 2022	In Progress
	Post the status report on the website and provide the report in an accessible format upon request.		Marketing/Web		Ongoing
File compliance report	File a compliance report every three years once number of employees exceeds 50.	File compliance report by end of 2017.	HR		Completed - December 2017
		File compliance report by June 30, 2021.		June 25, 2021	Completed - June 29, 2021
Customer Service					
Establish and post policies	Employer shall establish policies, practices, and procedures governing the provision of its goods and services to persons with disabilities.	Create an accessible customer service policy for WES. Link: https://www.wes.org/ca/accessible-customer-service-policy/	HR		Completed - April 2017 Revised - June 2021
		Communicate policy to employees and upload a copy of the policy to the shared drive or intranet for employees to access. Link: https://www.wes.org/ca/accessible-customer-service-policy/	HR		Completed - April 2017 Revised - June 2021
		Post the policy on WES' website.	Marketing		Completed - April 2017 Revised - June 2021
		Review, update, and repost customer service accessibility policy on the WES website and the intranet.	HR/Marketing	June 2021	Completed - June/July 2021
	Employer shall ensure that its policies, practices, and procedures are consistent with the following principles: - goods and services provided in a manner that respects the dignity and independence of persons with disabilities - provision of goods or services must be integrated unless an alternate measure is necessary to enable a person with a disability to obtain, use, or benefit from the goods or services - persons with disabilities must be given an opportunity equal to that given to others to obtain, use, and benefit from the goods or services	These principles are incorporated into the Accessible Customer Service policy.	HR		Completed - April 2017
Policies must deal with the use of assistive devices by persons with disabilities to obtain, use, or benefit from the provider's goods or services or the availability, if any, of other measures which enable them to do so.	The use of assistive devices is incorporated into the policy.	HR		Completed - April 2017	
Establish and post policies	Communicating with a person with a disability shall be done in a manner that takes into account the person's disability.	Appropriate communication with a person with a disability is incorporated into the policy.	HR		Completed - April 2017
	A person with a disability accompanied by a guide dog or other service animal shall be permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is excluded by law from the premises. If a service animal is excluded from the premises, the provider of goods or services shall ensure that other measures are available to enable the person with the disability to obtain, use, or benefit from the provider's goods or services.		HR		Completed - April 2017
			HR		Completed - April 2017

Use of service animals and support persons	If a person with a disability is accompanied by a support person, the provider of goods or services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.	Each requirement has been incorporated into the policy.	HR		Completed - April 2017				
	The provider of goods and services may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises.		HR		Completed - April 2017				
	The provider of goods or services shall ensure that notice is given in advance about any fee for admission to premises with respect to the support person.		HR		Completed - April 2017				
	The provider of goods or services shall prepare one or more documents describing its policies, practices, and procedures with respect to the matters governed by this section and, upon request, shall give a copy of the document(s) to any person.		HR		Completed - April 2017				
Notice of temporary disruption	If there is a temporary disruption in the provision of services, the provider shall give notice of the disruption to the public.	Each requirement has been incorporated into the policy.	HR		Completed - April 2017				
	Notice of disruption must include information about the reason for the disruption, anticipated duration, and alternative facilities or services that are available.		HR		Completed - April 2017				
	Notice may be given by posting the information on the premises, on the website, or by such other method as is reasonable in the circumstances.		HR		Completed - April 2017				
	Provider of goods or services shall prepare one or more documents describing its policies, practices, and procedures with respect to the matters governed by this section and, upon request, shall give a copy of the document(s) to any person.		HR		Completed - April 2017				
Training	Every provider of goods or services shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities: - Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer, or otherwise - Every person who participates in developing the provider's policies, practices, and procedures governing the provision of goods or services to members of the public or other third parties	Refer to training under general requirements	HR		Completed - April 2017				
	The training must include a review of the purposes of the Act and the requirements of this regulation and instruction about the following matters: - How to interact and communicate with persons with various types of disabilities - How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person - How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability - What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services				Completed - April 2017				
	Training must be provided to each person as soon as is practicable after he or she is assigned the applicable duties.				Ongoing				
	Training must be provided on an ongoing basis in connection with changes to the policies, practices, and procedures governing the provision of goods or services to persons with disabilities.				Ongoing				
	Provider of goods or services shall prepare one or more documents describing its policies, practices, and procedures with respect to the matters governed by this section and, upon request, shall give a copy of the document(s) to any person.				Completed - April 2017				
	Provider of goods or services shall keep records 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.				Completed - April 2017				
	Feedback process				Establish a process to receive and respond to feedback from persons with a disability regarding accessibility.	Refer to feedback process under Information and Communication standards.	HR		Completed - April 2017
					Feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text via email or otherwise.	Incorporated into policy that feedback be provided to HR with phone, email, and mailing address provided.	HR		Completed - April 2017
Feedback process	Feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text via email or otherwise.	Provide another option for customers or clients to provide accessibility feedback directly through the WES website.	Marketing/Web/Customer Experience	June 2021	Completed June 2021				
	Feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received.	Establish internal process to handle accessibility feedback received between customer service and HR.	HR/Marketing/Customer Experience	June 2021	Completed - June 2021				
		HR will contact the complainant upon receipt and consult internally to address the complaint within one week.	HR		Completed - November 2017				
	Provider of goods or services shall prepare one or more documents describing its policies, practices, and procedures with respect to the matters governed by this section and, upon request, shall give a copy of the document(s) to any person.	Refer to feedback process under Information and Communication standards.	HR		Completed - April 2017				
Information & Communication Standards									
Feedback process	Establish process to receive and respond to feedback regarding accessibility.	Document feedback process in WES' accessibility and customer service policies.	HR		Completed - April 2017				
	Notify the public regarding the feedback process.	Accessibility policies are posted on the website.	HR		Completed - April 2017 Revised - June 2021				

Accessible formats and communication supports	Provide accessible formats and communication supports in a timely manner, taking into account the person's disability and at a cost no more than the regular charge to persons without disabilities.	Establish internal resources or vendors to provide services in alternative formats. Document remediation vendors: Accessibil-IT Webinar accessibility vendors for closed captioning and transcription: 3Play	HR	May 2021	Completed - June 2021
		Upon request, documents and communication supports will be provided that meet each of the criteria outlined.			Ongoing as needed
	Consult with person requesting to determine suitability of accessible format and communication support.	HR will follow up and consult with the person to ensure suitability of accessible formats and communication supports provided.	HR		Ongoing as needed
	Notify the public of the availability of accessible formats and communication supports upon request.	Accessibility policies posted on the website.			Completed - April 2017 Revised - June 2021
Emergency procedures, plans, and public safety information	If emergency procedures, plans, and public safety information are made available to the general public, those materials must be made available in an accessible format or with appropriate communication supports upon request.	N/A - WES does not serve the general public on its premises.			N/A
Accessible websites and web content	Ensure that internet websites and web content conform to WCAG 2.0 Level A for newly created or refreshed websites.	Communicate and inform marketing team and webmasters of the WCAG 2.0 Level A guidelines.	Marketing/Web		Completed - September 2017
	All internet websites and web content must conform to WCAG 2.0 Level AA by January 1, 2021, except for Live captions and audio descriptions (pre-recorded).	The WES website was revamped in March 2021. Received approval to engage vendor on May 28, 2021. Completed a manual audit November 2021. Remediated issues December 2021	Marketing/Web	August 2021	Completed - November 2021
	WCAG 2.0 Guideline 1.2.1 - "Either an alternative for time-based media or an audio track is provided that presents equivalent information for prerecorded video-only content."	Research budget and engage external vendors to add closed captioning and transcription to webinars posted on the website. Received approval to engage vendor May 28, 2021.	Marketing	June 2021	Completed - June 2021
	WCAG 2.0 Guideline 1.2.2 - "Captions are provided for all prerecorded audio content in synchronized media, except when the media is a media alternative for text and is clearly labelled as such."	Research budget and engage external vendors to add closed captioning and transcription to webinars posted on the website. Received approval to engage vendor on May 28, 2021.	Marketing	June 2021	Completed - June 2021
		Research budget and engage an external vendor to remediate documents posted on the website to make them accessible. Received executive approval to engage vendor-Accessibil-IT in April 2021.	Project team	June 2021	Completed - May 2021
	In determining whether meeting the requirements is not practicable, the organization may consider: - availability of commercial software or tools or both - significant impact on implementation timeline that is planned or initiated before January 1, 2021	WES shall determine whether the requirements to comply as outlined are practicable.	Marketing/Web		Completed - November 2017
Employment Standards					
Workplace emergency response plan	The employer shall provide individualized workplace emergency response information to employees who have a disability (temporary or permanent) as soon as possible after the employer is made aware.	Send a memo to employees to inquire if anyone needs an individualized workplace emergency response plan.	HR	November 24, 2017 April 6, 2022	November 2017 Completed - April 6, 2022
		Create or update individualized emergency response plans for those employees who have disclosed a disability.	HR	December 31, 2017	No request received as of December 5, 2021 Reviewed existing employee plans - May 2022
		Develop internal process and customized emergency response template for WES and post to intranet.			Completed - June 2021
Workplace emergency response plan	With the employee's consent, employer shall communicate the plan to the person(s) designated to provide assistance to the employee.	For each employee who requires emergency response assistance and has provided consent, WES shall provide the information to the Fire Warden or other designated person in the event of an emergency in the workplace.	HR	December 31, 2017 December 5, 2022	N/A - No request received - Ongoing
		A record of the plans and a list of employees who have disclosed a disability will be maintained and updated annually.	HR	December 31, 2017 December 9, 2022	N/A - No request received - Ongoing
Workplace emergency response plan	The employer shall review the individualized emergency response plan: - when employee moves to a different work location - when the employee's accommodation needs are reviewed or are changed - when employer reviews its general emergency response plans and policies	Create an individualized emergency plan for those employees who have disclosed a disability.	HR		Ongoing
Recruitment and selection	The employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.	Add on all job postings in Canada that WES will accommodate applicants throughout the recruitment process upon request.	HR		Completed - November 2017
		Add statement to WES' Careers page under the employment equity section.	HR & Marketing	November 15, 2017	Completed
	The employer shall notify job applicants when selected for an interview or assessment that accommodations are available upon request in relation to the materials or processes to be used.	Recruiters communicate both orally and in writing to candidates that accommodation may be provided.	HR		Completed - November 2017; Audited practices - November/December 2021
	If 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 applicant's disability.	If candidate requests an accommodation, HR shall work with the candidate to make suitable arrangements for accommodation.	HR		Ongoing
	The employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Add a general statement in the offer letter template directing the candidate to reference WES' accessibility policies found on its website. Added statement to offer letters: WES is committed to treating all people in a way that allows them to maintain their dignity and independence. WES is an accessible employer and provides accommodations for employees with disabilities. To read our accessibility policy, please visit https://www.wes.org/ca/accessibility-policy/ . Should you require an accommodation plan or an individualized workplace emergency response plan during your employment, please contact Human Resources at hrcan@wes.org so that appropriate arrangements can be made.	HR	December 5, 2017	Completed - June 2021
Informing	The employer shall inform its employees of its policies in support of its employees with disabilities including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	All existing employees will be informed of the accessibility policies in place that outline accommodation processes available to them.	HR		Completed - April 2017 Revised - 2021
		All policies and procedural information related to accessibility are accessible by employees via the internal shared drive or HR intranet site.	HR	December 8, 2017	Completed - Uploaded to share drive and communicated December 11, 2021

employees of supports	The employer shall provide information to new employees as soon as practicable after they begin their employment.	Develop new orientation processes to ensure that new employees are informed of the accessibility policies in place and to advise HR should the new employees require any accommodation or support.	HR		Completed - Nov 2017 Revised - 2021
	The employer 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 a disability.		HR		Completed - 2017/2021 Ongoing
Accessible formats and communication supports for employees	Upon request, the employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: - information needed to perform the employee's job - information that is generally available to employees in the workplace		HR		Ongoing
	The employer shall consult with the employee to determine the suitability of an accessible format or communication support.		HR		Ongoing
Individual accommodation plan (IAP)	Employers shall develop a written process for the development of documented individual accommodation plans (IAP) for employees with disabilities.	The IAP process is outlined in the accessibility policy. The sample IAP template as provided by the Ontario accessibility website will be used.	HR		Completed - April 2017
	The IAP process to develop individual accommodation plans for employees shall include: - how employees can participate - how employees will be assessed - how employer can request a medical evaluation to assist the employee in determining if accommodation can be provided and if so how it can be provided - how employees can request participation of union or other representatives in the development of the accommodation plan - how employees' personal information will remain private - how and how often plan will be reviewed and updated and how this is to be done - how reasons for denied request would be communicated - how plan will be provided to an employee in a format that takes into account the employee's accessibility needs due to the employee's disability	The required elements have been incorporated into the process as outlined in WES' accessibility policy.	HR		Completed - April 2017
			HR		
Return to work process	Every employer shall develop and document a return to work process for employees who have been absent because of a disability and require disability-related accommodation in order to return to work.	HR will work with the employee to develop a return to work plan using the sample template provided by the Ontario accessibility website. The documented plan will be kept on file and maintained by HR.	HR		Ongoing
			HR		Ongoing
Return to work process	The return to work process shall: - outline the steps the employer will take to facilitate the return to work of employees - use documented individual accommodation plans as part of the process		HR	Q1, 2018	Ongoing
Performance Management	The employer shall take into account the accessibility needs of employees with disabilities as well as individual accommodation plans, when using its performance management process	Educate and train HR on each of the employment standard requirements and provide reference materials to help them respond and handle requests (train the trainer).	HR	January 30, 2018	Ongoing
Career development	The employer shall take into account the accessibility needs of employees with disabilities as well as individual accommodation plans, when providing career development and advancement to its employees with disabilities.	The required elements have been incorporated into the process as outlined in WES' accessibility policy.	HR	January 30, 2018	Ongoing
Redeployment	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.	Sample accommodation process and template	HR	January 30, 2018	Ongoing