

INTEGRATED ACCESSIBILITY STANDARDS: PRIMARIS' MULTI-YEAR ACCESSIBILITY PLAN TO PREVENT AND REMOVE BARRIERS TO ACCESSIBILITY

About the Accessibility for Ontarians with Disabilities Act, 2005

In 2005, the government of Ontario passed the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), which requires that Ontario achieve accessibility for persons with disabilities by 2025. Public, private and non-profit organizations have obligations under the AODA to help make Ontario accessible. To guide organizations through that process, the AODA contains accessibility standards that assist organizations in the identification, prevention and removal of barriers to accessibility for persons with disabilities. The AODA contains accessibility standards in a variety of areas, including:

- Customer Service
- Information and Communications
- Employment
- Transportation
- Design of Public Spaces

The AODA and its standards are not a replacement or substitution for the requirements of the *Human Rights Code* (Ontario).

On July 1, 2011, the Integrated Accessibility Standards (Ontario Regulation 191/11) came into force. The regulation establishes standards to address barriers that persons with disabilities face in the areas of information and communications, employment, transportation and built environment. As a large, private sector organization, Primaris has obligations under the Integrated Accessibility Standards that come into effect on a rolling basis.

Primaris is committed to meeting its obligations under the AODA and its regulations. In many cases, Primaris has already developed practices that bring our company into compliance with the requirements for large organizations ahead of schedule.

About this Document

Primaris' Multi-Year Accessibility Plan (the “Plan”) is a road map for our path to increased accessibility as a company. The goal of the Plan is to provide the action steps that bring life to Primaris' Integrated Accessibility Standards Policy and Commitment Statement. This document describes:

- how Primaris will meet accessibility requirements within the Integrated Accessibility Standards' mandatory timelines,
- how Primaris will address current accessibility barriers in our organization, and

- how Primaris will identify and remove future barriers.

The document is organized in chronological order. It identifies the different standards applicable to Primaris and the dates on which compliance with each standard is required. It also provides information regarding Primaris' progress to date with respect to each standard. Over time, this document will be updated with information that reflects the practices and procedures that Primaris has adopted throughout the compliance process envisioned by the Integrated Accessibility Standards.

Primaris is committed to reviewing the Plan at least once every five years. Primaris will prepare and file an annual status report on the progress of measures taken to implement the strategy outlined in our Plan and post the status report on our website. Status reports will be made available in an accessible format upon request.

Applicable Integrated Accessibility Standard	Detailed Standard	Implementation Date	Actions	Status
Employment	Emergency Procedure, Plans or Public Safety Information – s. 13	By January 1, 2012	<p>Primaris has emergency response procedures, plans and public safety information that it makes available to the public.</p> <p>Upon request, Primaris provides or arranges for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Primaris consults with the person making the request for an accessible format or communication support for the procedures, plans and public safety information when determining the suitability of an accessible format or communication support.</p>	Ongoing compliance.
Employment	Individualized Workplace Response Information – s. 27	By January 1, 2012	Primaris provides individualized workplace emergency response information to employees with disabilities where the disability is such that individualized information is necessary and Primaris is aware of the need for accommodation.	Ongoing compliance.

			<p>In the event that an employee who receives individualized workplace emergency response information requires assistance, Primaris designates a person to provide assistance and, with the employee's consent, Primaris provides the workplace emergency response information to the person.</p> <p>Primaris provides workplace emergency response information as soon as practicable after learning of the need for accommodation due to an employee's disability.</p> <p>Primaris reviews individualized workplace emergency response information, at minimum, whenever:</p> <ul style="list-style-type: none"> • the employee moves to a different location within Primaris, • the employee's overall accommodation needs or plans are reviewed, or • Primaris reviews its general emergency response policies. 	
General Requirements under the IAS Regulation	Accessibility Policy – s. 3(1)	By January 1, 2014	<p>An Integrated Accessibility Standards Policy has been drafted and approved by Primaris' executive management team, introduced to all Ontario employees via email and posted on the website in an accessible format that conforms with, at minimum, Web Content Accessibility Guidelines (WCAG) 2.0 Level A.¹</p> <p>Additionally, upon request, Primaris will provide or arrange for accessible formats</p>	Ongoing compliance.

¹ Note: Primaris will, by 2021, ensure that the Policy is posted in a format that conforms with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

			<p>and communication supports for the Policy for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Primaris will consult with the person making the request for an accessible format or communication support for the Policy when determining the suitability of an accessible format or communication support.</p>	
	Statement of Commitment – s. 3(2)	By January 1, 2014	<p>A Statement of Commitment has been drafted and approved by Primaris' executive management team, introduced to all Ontario employees via email and posted on the website in an accessible format that conforms with, at minimum, WCAG 2.0 Level A.²</p> <p>Additionally, upon request, Primaris will provide or arrange for accessible formats and communication supports for the Statement of Commitment for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Primaris will consult with the person making the request for an accessible format or communication support for the Statement of Commitment when determining the suitability of an accessible format or communication support.</p>	Ongoing compliance.

² Note: Primaris will, by 2021, ensure that the Statement of Commitment is posted in a format that conforms with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

	Multi-year Accessibility Plan – s. 4	By January 1, 2014	<p>This document, the Multi-year Accessibility Plan (the “Plan”), has been developed and approved by the executive management team, with input from applicable departments on an as needed basis.</p> <p>The Plan has been introduced to all Ontario employees via email and has been posted on the website in an accessible format that conforms with, at minimum, WCAG 2.0 Level A.³</p> <p>The Plan will be reviewed and updated at least once every five years.</p> <p>Additionally, upon request, Primaris will provide or arrange for accessible formats and communication supports for the Plan for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Primaris will consult with the person making the request for an accessible format or communication support for the Plan when determining the suitability of an accessible format or communication support.</p> <p>Finally, prior to the Design of Public Spaces Requirements come into effect under the Integrated Accessibility Standards, Primaris will ensure that its Plan is updated to include the items required under the Maintenance Standard (s. 80.44).</p>	Ongoing compliance.
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³ Note: Primaris will, by 2021, ensure that the Multi-year Accessibility Form is posted in a format that conforms with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

	Self-service kiosks – s. 6	By January 1, 2014	Although Primaris currently does not use self-service kiosks, Primaris will have regard to the accessibility for persons with disabilities should it design, procure or acquire self-service kiosks by considering what accessibility features could be built into kiosks to best meet the needs of our customers and clients.	Currently not applicable.
Information & Communication Standard	Accessible websites & web content – s. 14(4)	By January 1, 2014	Primaris will ensure that new internet websites, including web content on those sites (that Primaris controls directly or through a contractual relationship that allows Primaris to modify the content), conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A. ⁴	Ongoing compliance.
General Requirements	Training – s. 7	By January 1, 2015	<p>Primaris will provide training to:</p> <ul style="list-style-type: none"> • all of its Ontario employees, • all persons who participate in developing Primaris' policies, and <p>on the requirements of the accessibility standards referred to in the Integrated Accessibility Standards and continue to provide training on the <i>Human Rights Code</i> (Ontario) as it pertains to persons with disabilities. Training will be provided as soon as practicable. Training will also be included as part of Orientation for all new hires.</p> <p>The training provided will take into consideration and be appropriate to the duties of those receiving the training.</p>	Ongoing compliance.

⁴ Note: As reflected in the chart below, Primaris will, by 2021, ensure that its websites, including web content on those sites (that Primaris controls directly or through a contractual relationship that allows Primaris to modify the content) conform with WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 and 1.2.5 or where meeting the requirement is not practicable.

			<p>Primaris will provide training, on an ongoing basis, with respect to changes made to the Integrated Accessibility Policy and Commitment Statement.</p> <p>Records of the training provided will be maintained and will include: (i) the dates on which training was provided and (ii) the number of individuals to whom training is provided.</p>	
Information & Communication	Feedback – s. 11	By January 1, 2015	<p>Primaris will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by, upon request, providing or arranging for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person's accessibility needs due to disability and (if applicable) at a cost that is no more than the regular cost charged to other persons.</p> <p>Primaris will consult with the person making the request for an accessible format or communication support when determining the suitability of an accessible format or communication support.</p> <p>Primaris will continue to advise the public about the availability of accessible formats and communication supports with respect to its feedback processes through a notification on the website.</p> <p>The processes that Primaris develops to meet its feedback obligations under the Integrated Accessibility Standards will be complementary to, and will not detract from, the feedback processes Primaris has developed in accordance with the Customer Service Standards.</p>	Ongoing compliance.

Employment Standard	Recruitment – ss. 22-24	By January 1, 2016	<p>In our recruitment processes, Primaris will advise potential employees and the public about the availability of accommodation for applicants with disabilities.</p> <p>Primaris will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.</p> <p>If a selected job applicant requests accommodation, Primaris will consult with the individual and provide or arrange for the provision of suitable accommodation that takes into account the applicant's disability-related needs.</p> <p>When making offers of employment, Primaris will notify successful applicants of our policies for accommodating employees with disabilities.</p>	Ongoing compliance.
	Information for employees regarding supports – s. 25 & 26	By January 1, 2016	<p>Primaris will notify our employees of Primaris' policies (and any updates to those policies) for supporting employees with disabilities, including (at minimum) our policies regarding the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>This information will be provided to new hires as soon as practicable after they commence employment.</p> <p>If an employee with a disability asks for information in an accessible format or to receive communication supports, Primaris will consult with the employee to provide, or arrange for the provision of, accessible</p>	Ongoing compliance.

			<p>formats and communication supports for information that the employee needs to perform his/her job, as well as information that is generally available to other employees.</p> <p>In determining the suitability of an accessible format or communication support, Primaris will consult with the employee making the request.</p>	
	<p>Documented Individual Accommodation Plans – s. 28</p>	<p>By January 1, 2016</p>	<p>Primaris will develop and maintain a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>The process for the development of documented individual accommodation plans will 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 Primaris can request an evaluation by an outside medical or other expert, at Primaris' expense, to assist Primaris in determining if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from the workplace 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 will be 	<p>Ongoing compliance.</p>

			<p>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> <p>If requested, information regarding accessible formats and communication supports provided will also be included in individual accommodation plans, in accordance with the Accessible Formats and Communication Supports for Employees Standard (s. 26).</p> <p>Additionally, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided, in accordance with the Workplace Emergency Response Information Standard (s. 27).</p> <p>Finally, individual accommodation plans will identify any other accommodation that is to be provided.</p>	
	Return to Work Process – s. 29	By January 1, 2016	<p>Primaris will develop and maintain a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.</p> <p>The return to work process will, as part of the process, outline the steps that Primaris will take to facilitate the return to work and will include documented individual accommodation plans.</p> <p>Primaris notes that this return to work process will not replace or override any</p>	Ongoing compliance.

			other return to work process created by or under any other statute (for example, <i>the Workplace Safety Insurance Act, 1997</i>).	
	Performance Management (s. 30), Career Development and Advancement (s. 31), and Redeployment (s. 32)	By January 1, 2016	Primaris will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.	Ongoing compliance.
Information & Communication	Accessible formats and communication supports – s. 12	By January 1, 2016	<p>Upon request, Primaris will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account each person’s accessibility needs due to disability and at a cost that is no more than the regular cost charged to other persons.</p> <p>Primaris will consult with the person making the request for accessible formats or communication support when determining the suitability of an accessible format or communication support.</p> <p>Primaris will advise the public about the availability of accessible formats and communication supports through a notification on our company website.</p>	Ongoing compliance.
Design of Public Spaces	Outdoor Public Use Eating Areas – ss. 80.16 and 80.17	By January 1, 2017	Primaris will adhere to all applicable general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop outdoor public use eating areas that we intend to maintain.	Ongoing compliance.
	Exterior Paths of Travel – ss. 80.21 - 80.31	By January 1, 2017	Primaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop exterior paths of	Ongoing compliance.

			travel that we intend to maintain (including ramps, stairs, curb ramps, depressed curbs, pedestrian signals and rest areas) that are intended to serve a functional purpose, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards.	
	Accessible Parking – ss. 80.32 - 80.39	By January 1, 2017	Primaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop off-street parking facilities that we intend to maintain, subject to applicable exceptions and limitations as contemplated by the Integrated Accessibility Standards.	Ongoing compliance.
	Obtaining Services – ss. 80.40 - 80.43	By January 1, 2017	Primaris will adhere to the general obligations and technical requirements of the Integrated Accessibility Standards when we construct new or redevelop service counters, fixed queuing guides and waiting areas.	Ongoing compliance.
	Maintenance – s. 80.44	By January 1, 2017	<p>Prior to the Design of Public Spaces Requirements come into effect under the Integrated Accessibility Standards, Primaris will ensure that its multi-year accessibility plan is updated to include:</p> <ol style="list-style-type: none"> 1. Procedures for preventative and emergency maintenance of the accessible elements in Primaris' public spaces that are governed by the Integrated Accessibility Standards. 2. Procedures for dealing with temporary disruptions when accessible elements in Primaris' public spaces that are governed by the Integrated Accessibility Standards are not in working order. 	Ongoing compliance.

Information & Communication	Accessible websites and web content	By January 1, 2021	Primaris will ensure that its websites, including web content on those sites (that Primaris controls directly or through a contractual relationship that allows Primaris to modify the content), conform with the WCAG 2.0 at Level AA, except with respect to success criteria 1.2.4 (captions (live)) and 1.2.5 (pre-recorded audio descriptions) or where meeting the requirement is not practicable.	Ongoing compliance.
Full Accessibility		By January 1, 2025	This is the date by which the development, implementation and enforcement of accessibility standards is contemplated by the AODA in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises. Primaris will ensure compliance with its obligations under the AODA and its regulations by this date.	In progress.