

Accessibility for Ontarians with Disability Act (AODA), 2005

Integrated Accessibility Standard

Multi Year Plan

Statement

Edge Imaging Toronto Inc. (“Edge”) is committed to providing excellent customer service in all of our dealings with our customers and service providers, including people with disabilities. We strive to ensure our customer service accessibility policies, procedures and practices are consistent with the following principles: dignity, independence, integration and equality.

AODA Requirements

There are three standards within the AODA which impact Edge and its business. This includes:

1. Customer Service Standard
2. Employment Standard
3. Integrated Standard

The multi—year accessibility plan will cover these related standards.

Customer Service Standard

1. Customer Feedback
2. Employee Training
3. Policies, practices and procedures (general, service animals, support individuals, tools)

Employment Standard

1. Individual Emergency Evacuation Procedures
2. Recruitment process including notification of available accommodation as part of the recruitment and selection process
3. Accommodation throughout life cycle of employment (policies)

Integrated Standard

AODA Definitions

The following words are defined as:

“disability” is as defined in the AODA “(a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and without limiting the generality of the foregoing, includes diabetes melitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

(b) a condition of mental impairment or a developmental disability,

(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

(d) a mental disorder, or

(c) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)¹

“Edge” means Edge Imaging Toronto Inc.

Information and Communication Standard

Requirement	Citation	Status	Future Action	Targeted Date
Feedback	<p>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 the provision of accessible formats and communications supports, upon request. O. Reg 191/11, s. 11 (1).</p> <p>(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process. O. Reg. 165/16, s. 7.</p> <p>(3) Nothing in this section detracts from the obligations imposed under section 7 of Ontario Regulation 429/07 (Accessibility Standards for Customer Service) made under the Act O. Reg. 191/11. s.11 (2)</p>	Company policies established about feedback meet legislative requirements.	Policy meets requirements	Completed
Accessible Formats	<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. O. Reg. 191/11, s. 12 (1).</p>	Company policies established about accessible formats meet legislative requirements.	Policy meets requirements.	Completed

	<p>(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 12 (2).</p> <p>(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports. O. Reg. 191/11, s. 12 (3).</p>			
Accessible Web Site	<p>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. Reg. 191/11, s. 14(2).</p>	<p>Reviewed content with Information Technology Team and met current requirements.</p>	<p>The Information Technology department has been updated on the requirement. Future changes to the company web site(s) will be made to comply with this regulation.</p>	<p>Jan. 1, 2021</p>

Customer Service Standard

Requirement	Citation	Status	Future Action	Targeted Date
Policies	<p>80.46 (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities. O. Reg. 165/16, s. 16.</p> <p>(2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <ol style="list-style-type: none"> 1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities. 	<p>Company policies established meet legislative requirements.</p>	<p>Review policies every 5 years.</p>	<p>Rolling 5-year target date.</p>

	<p>2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.</p> <p>3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.</p> <p>4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability. O. Reg. 165/16, s. 16.</p>			
<p>Service Animals and Support Persons</p>	<p>80.47 (1) This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises. O. Reg. 165/16, s. 16.</p> <p>(2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises. O. Reg. 165/16, s. 16.</p> <p>(3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities. O. Reg. 165/16, s. 16.</p> <p>(4) If a person with a disability is accompanied by a support person, the provider 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. O. Reg. 165/16, s. 16.</p> <p>(5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the</p>	<p>Company policy established meets legislative requirements.</p>	<p>Policies and procedures will be reviewed on a needs basis with a minimum review of every five (5) years.</p>	<p>Rolling five-year deadline.</p>

	<p>available evidence, the provider determines that,</p> <p>(a) 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; and</p> <p>(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises. O. Reg. 165/16, s. 16.</p> <p>(8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person. O. Reg. 165/16, s. 16.</p> <p>(10) The notice required by subsection (9) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider’s website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.</p>			
<p>Notice of Service Disruptions</p>	<p>80.48 (1) If, in order to obtain, use or benefit from a provider’s goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 165/16, s. 16.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available. O. Reg. 165/16, s. 16.</p> <p>(3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person. O. Reg. 165/16, s. 16.</p> <p>(4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request. O. Reg. 165/16, s. 16.</p> <p>(5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on</p>	<p>Company policy established meets legislative requirements.</p>	<p>No further action.</p>	<p>Completed</p>

	premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.			
Training	<p>80.49 (1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> 1. Every person who is an employee of, or a volunteer with, the provider. 2. Every person who participates in developing the provider's policies. 3. Every other person who provides goods, services or facilities on behalf of the provider. O. Reg. 165/16, s. 16. <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> 1. How to interact and communicate with persons with various types of disability. 2. 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. 3. 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, services or facilities to a person with a disability. 4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities. O. Reg. 165/16, s. 16. <p>(3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 165/16, s. 16.</p> <p>(4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46. O. Reg. 165/16, s. 16.</p>	Training provided annually and to new hires.	Ongoing review. Establish training policy.	Ongoing

	<p>(5) Every provider, other than a small organization, 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. O. Reg. 165/16, s. 16.</p> <p>(6) Every provider, other than a small organization, shall,</p> <p>(a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and</p> <p>(b) on request, give a copy of the document to any person. O. Reg. 165/16, s. 16.</p> <p>(7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request. O. Reg. 165/16, s. 16.</p> <p>(8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 165/16, s. 16.</p>			
<p>Feedback process for providers of goods or services</p>	<p>80.50 (1) Every provider shall establish a process for receiving and responding to,</p> <p>(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and</p> <p>(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3). O. Reg. 165/16, s. 16.</p> <p>(2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities. O. Reg. 165/16, s. 16.</p> <p>(3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request. O. Reg. 165/16, s. 16.</p>	<p>A process is established which meets legislative requirements.</p>	<p>No further Action.</p>	<p>Completed</p>

	<p>(4) Every provider shall make information about the feedback process readily available to the public. O. Reg. 165/16, s. 16.</p> <p>(5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person. O. Reg. 165/16, s. 16.</p>			
Notice of availability of documents	<p>8.(1) Every designated public sector organization and every other provider of goods or services that has at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents required by this Regulation are available upon request. O. Reg. 429/07, s. 8(1).</p> <p>(2) The notice may be given by posting the information at conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances. O. Reg. 429/07, s. 8(2)</p>	Customer Service statement includes a statement that documents are available upon request and that a person's abilities will be a factor in how they receive the information.	Meets requirements.	Completed.
Format of documents	<p>80.51 (1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,</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. O. Reg. 165/16, s. 16.</p> <p>(2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 165/16, s. 16.</p>	Customer statement meets legislative requirements.	Meets requirements.	Completed.

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Employment Standard

Requirement	Citation	Status	Future Action	Targeted Date
Individual Emergency Evacuation Procedures	<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. O. Reg. 191/11, s. 27(1).</p> <p>(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. O. Reg. 191/11, s. 27(2).</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. O. Reg. 191/11, s. 27(3).</p> <p>(4) Every employer shall review the individualized workplace emergency response information.</p>	Established process and communicated to employees.	Meets requirements.	Completed

	<p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and;</p> <p>(c) when the employer reviews its general emergency response policies. O. Reg. 191/11, s. 27(4)</p> <p>(d) Every employee shall meet the requirements of this section by January 1, 2012. O. Reg. 191/11, s. 27(5).</p>			
<p>Recruitment notification of accommodation within the selection process.</p>	<p>Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. O. Reg. 191/11s.22.</p> <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 requires in relation to the materials or processes to be used. O. Reg. 191/11, s. 23(1).</p> <p>(2) If a selected applicant request an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a</p>	<p>Under the careers section applicants and employees are informed about the ability to request accommodation and how to make the request.</p>	<p>Will add language to the offer letter which supports requests for accommodations.</p>	<p>To be completed once the offer letter language is altered in 2018.</p>

	<p>manner that takes into account the applicant's accessibility needs due to disability. O. Reg. 191/11, s.23(2).</p> <p>Every employer shall when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. O. Reg. 191/11, s. 24.</p>			
Employee 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. O. Reg. 191/11, s. 28(1)</p> <p>(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 assist the employer in determining if accommodation can be achieved and, if so, how 	Established process and communicated to employees.	Meets requirements.	Completed.

	<p>accommodation can be achieved.</p> <p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <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. O. Reg. 191/11, s.28(2). (3) Individual accommodation plans shall,</p>			
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	<p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27;</p> <p>and</p> <p>(c) identify any other accommodation that is to be provided. O. Reg. 191/11, s. 28 (3).</p>			
Employee Supports	<p>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. O. Reg. 191/11, s. 25 (1).</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25(2).</p> <p>(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. O.Reg. 191/11,s.25</p>	Documented accommodation policy.	Communicate to employees as part of Policy Review Process.	2018
Accessible Formats	25(1) Every employer shall inform its employees of its	Documented accommodation	Meets Requirements.	Completed.

	<p>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. O Reg 191/11, s. 25(1)</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. O Reg. 191/11, s.25 (1).</p> <p>(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. O Reg. 191/11, s. 25</p> <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. O. Reg. 191/11, s. 26(1).</p> <p>(2) The employer shall consult with the employee making the request in</p>	<p>policy which is posted on the Employee SharePoint site.</p>		
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	determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 26(2).			
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. O. Reg. 191/11, s. 29 (1).</p> <p>(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 documented individual accommodation plans, as described in section 28, as part of the process. O. Reg. 191/11, s. 29 (2).</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. O. Reg. 191/11, s. 29 (3).</p>	Documented accommodation and return to work policy which is posted on the Employee SharePoint site.	Meets requirements.	Completed.
Employment Life Cycle	30. (1) An employer that use performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities,	Informal process which maintains legislative principles.	Create performance management program 2018.	

	<p>as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. O. Reg. 191/11, s. 30(1)</p> <p>(2) In this section, “performance management” means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success. O. Reg. 191/11, s. 30 (2).</p> <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. O. Reg. 191/11, s. 31(1).</p> <p>(2) In this section, “career development and advancement” includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and,</p>			
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	<p>for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them. O. Reg. 191/11, s. 31(2).</p> <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. O. Reg. 191/11, s.32(1).</p> <p>(2) In this section, “redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization. O. Reg. 191/11, s.32(2).</p>			
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The multi-year plan will be reviewed every five years and appropriate adjustments will be made.

Individuals that have questions regarding the implementation of the AODA at Edge, the policies and procedures or requests for documents can be directed to:

Human Resources
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