



ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

As of 04-OCT-2017

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 created and posted on company website and intranet.	Complete/ Compliant	01-JAN-2014
4	Accessibility Plans	4.(1) Large organizations shall, a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization' 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.	Multi Year plan has been posted on company website and intranet. Next Review of Multi Year Plan	Complete	01-JAN-2014 01-NOV-2021

BIC Inc. Canada CP

Integrated Accessibility Standards

File: AODA

Responsibility: BIC Canada

Prepared by: Kristy Jones & Brittany McCann



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.	AODA training and webinars conducted to educate team members on AODA at all levels. Training module created and posted on internal e-learning site for all employees ("IAS Training Program for Employees"). Further Manager training specifically geared around recruitment practices to be integrated. AODA training is tracked on LMS	Complete/ Compliant Scheduled for 2017 Ongoing/ Compliant	01-JAN-2015
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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.	<p>Visitor feedback can be provided in person, in writing, by e-mail and phone.</p> <p>Determine what accessible formats and communication supports will be provided upon request.</p> <p>Employees and management are aware of the need to accommodate upon request through training.</p>	<p>Ongoing/Compliant</p> <p>Ongoing/Compliant</p> <p>Complete/Compliant</p>	01-JAN-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.	Team members and management are aware of the need to accommodate upon request through training provided.	Compliant	01-JAN-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.	Training provided to all team members highlighted the need to consult the person making the request in order to determine the support needed.	Compliant	01-JAN-2016



12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Policy and procedure posted on internal and external websites.	Complete/Compliant	01-JAN-2016



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.	Identified website requirements and worked with vendors to ensure they are conforming to the WCAG standards with all new websites and updates to current websites. Level AA has been applied post January 2014. Corporate Communications and Marketing team share the responsibility for ensuring third party web developers verify compliance of website content prior to going live. Corporate legal supports the Communication and Marketing teams to ensure compliance obligations are included in contracts with third party web developers.	Ongoing/Compliant	01-JAN-2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. 01-JAN-2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none">• success criteria 1.2.4 Captions (Live)• success criteria 1.2.5 Audio Descriptions (Pre-recorded).
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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.	Accommodation language has been inserted in all job posting and posted on website. <i>“BIC is an equal opportunity employer and committed to recruiting, developing and maintaining a diverse workforce in compliance with all applicable Human Rights legislation. The Company will endeavor to make reasonable accommodations up to the point of undue hardship, for disabilities made known to it by its employees and applicants.”</i>	Complete/ Compliant	01-JAN-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	Applicants are notified how we will accommodate (telephone, email, letter, etc.) based on required accommodations advised. Prior to conducting interviews barriers are identified to develop an accommodation plan:	Ongoing/Compliant	01-JAN-2016

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		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.	location of interview room, room set up for in person interviews, interviewing timelines, supports, paperwork, etc. BIC Inc. only partner with staffing agencies who have an AODA action plan and who are fully compliant to date in AODA.		
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.	Employment offer letters include a clause that informs candidates that we have an accommodation process <i>and that we provide accommodations for team members with disabilities. Candidates can request specific accommodations to be put in place prior to their start date by phone or email.</i>	Ongoing/ Compliant	01-JAN-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.	Accessibility policy is communicated to each new hire and the statement has been posted both internally and externally	Complete/ Compliant	

25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Accessibility policy has been added as a part of the orientation program. Orientation for new hires also includes policy review and sign-off.	Complete/ Compliant	01-JAN-2016
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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.	Team members will be updated on all information 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.	Ongoing/ Compliant	01-JAN-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.	Procedures have been updated.	Compliant	01-JAN-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.	See 26.1	Compliant	01-JAN-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.	New hire form updated to include the request of accommodations.	Complete/Compliant	01-JAN-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.	Individual workplace emergency response assistance provided and arranged on a need be basis.	Complete/Compliant	01-JAN-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.	Action is taken immediately to ensure the appropriate information is provided to those designated to provide assistance, as soon as BIC Inc. has been notified of the need for accommodation.	Complete/Compliant	01-JAN-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;	All managers are made aware of individualized workplace emergency response information as they become available.	Complete/Compliant	01-JAN-2012



		(b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.			
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28	Documented Individual Accommodation Plans	<p>28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>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	Document current procedures and steps to follow when creating an individual accommodation plan for employees with disabilities as outlined in the section of the act.	Compliant	01-JAN-2016
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		<p>agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</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.</p>			
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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>	Review current practice and document the return to work process.	Compliant	01-JAN-2016
		<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> <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>	Review current policies and update based on requirements	Compliant	01-JAN-2016
30	Performance Management	<p>30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with</p>	Team members are measured in a way that takes their disability into consideration.	Compliant	01-JAN-2016



		disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.			
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.	During the talent review process team members are evaluated in consideration of their individual accommodation plans.	Compliant	01-JAN-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 accessibility needs of team members are considered when calibrating performance for redeployment.		01-JAN-2016