



**INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan**

<b>HR Policy:</b>	<b>POL-En-003.00</b>
<b>Issued:</b>	<b>January 1, 2014</b>
<b>Revised:</b>	<b>December 20, 2016</b>
<b>Version:</b>	<b>2.0</b>

This **Multi-Year Accessibility Plan** has been developed in accordance with the Integrated Accessibility Standards Regulation under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). The plan outlines the initiatives and actions that the Company will take over the five (5) year period from 2014-2019 to address barriers to accessibility, while ensuring the Company meets its obligations under the *Ontarians with Disabilities Act, 2001*. These initiatives also support Hydro Ottawa’s commitment to providing customer service in a manner that respects the principles of dignity, independence, integration and equal opportunity.

**Part I – GENERAL REQUIREMENTS**

<b>Section</b>	<b>Initiative</b>	<b>Description</b>	<b>Action</b>	<b>Status</b>	<b>Compliance Date</b>
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.	An Accessibility policy has been developed and implemented. Hydro Ottawa is committed to accessibility and demonstrates that commitment by preventing, identifying and removing barriers that impede accessibility for persons with disabilities.	Compliant	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall,	No further action required; this document is the multi-year plan which outlines our strategy and associated initiatives to prevent and remove barriers. This plan will be reviewed and updated as required to ensure continued compliance, at minimum on an annual basis.	Compliant	January 1, 2014
		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 Hydro Ottawa website and provide the plan in an accessible format upon request;			
		c) Review and update the accessibility plan at least once every five years.	While the requirement is to review and update the accessibility plan every 5 years the Hydro Ottawa Accessibility Committee will review the multi-year plan at least annually to ensure accuracy and compliance.	Compliant	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.	Hydro Ottawa provides mandatory online training on the Integrated Accessibility Standards Regulation for new hires as part of the onboarding process. It includes training on the Human Rights code as it pertains to persons with disabilities. Training for persons within 7.(1)(c) is provided by the consulting organization.	Compliant	January 1, 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.	A "Feedback and Document Request Process" is live on Hydro Ottawa's website. In addition, there is a statement indicating that documents are available in various accessible formats or with communication support, on request.	Compliant	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.  12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication	Hydro Ottawa is committed to providing customer service in a manner that respects the dignity, independence, integration and equal opportunity and actively solicits feedback and comments via the website to ensure individual accessibility needs are met in a timely manner. In addition, there is a statement indicating that documents are available in various accessible formats or with communication support, on request. Should an accessible format request be made by an individual, Hydro Ottawa will consult with the person to identify a format and/or support that meets their needs.	Compliant	January 1, 2016

		support.			
		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.			
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.	Hydro Ottawa has implemented Individualized Emergency Response Plans and an Employee Request for Emergency Assistance Form, which applies to employees only and as such, is only available on the intranet and not our corporate website.	Compliant	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.	<p><b>January 1, 2014</b> – Hydro Ottawa’s corporate website conforms to WCAG 2.0 Level A standards.</p> <p><b>January 1, 2021</b> All internet websites and web content must conform to WCAG 2.0 Level AA, other than success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded). Work on this is underway.</p>	<p>January 2014 compliance requirement complete.</p> <p>January 1, 2021 compliance requirement in progress.</p>	January 1, 2014 and January 1, 2021

### 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.	Hydro Ottawa’s main careers page and each individual job posting on the website notify the public about the availability of recruitment-related accommodations for disabilities.	Compliant	January 1, 2016
23	Recruitment, Assessment or	23.(1) During a recruitment process, an employer shall notify job applicants, when	The recruiting process includes candidate notification by the Talent Attraction &	Compliant	January 1, 2016

	Selection Process	<p>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.</p> <p>(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.</p>	Acquisition team that accommodations are available upon request during the selection process. Hydro Ottawa makes suitable accommodations in consultation with the candidate.		
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.	Successful candidates are notified of the company's policies for accommodating employees with disabilities by the Talent Attraction & Acquisition team at time of offer via the offer letter.	Compliant	January 1, 2016
25	Informing Employees of 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.</p> <p>25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>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.</p>	In order to ensure a fair and consistent approach when an employee experiences an injury or illness, Hydro Ottawa's maintains a Disability Management Program which is designed to promote employee health and recovery through early intervention and active case management. It includes a policy to address non-occupational injuries and illnesses. Our practice is to inform new hires of our program and key policies and processes within the first week of employment (via email) and again during the mandatory new employee AODA e-learning module. Any program/policy updates are promptly communicated to all employees through our internal corporate communication channels and through their direct manager or supervisor.	Compliant	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	Hydro Ottawa will consult with employees with disabilities to determine which accessible formats or communication supports they require. Once Hydro Ottawa and the employee have determined what the needs	Compliant	January 1, 2016

		<p>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.</p> <p>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>are, Hydro Ottawa will work with the individual to determine how to accommodate the employee.</p>		
27	Workplace Emergency Response Information	<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.</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.</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.</p> <p>4) Every employer shall review the individualized workplace emergency response information,</p> <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</p>	<p>Hydro Ottawa has implemented Individualized Emergency Response Plans and an Employee Request for Emergency Assistance Form, and it is available on the intranet.</p>	Compliant	January 1, 2012

		reviewed; and (c) when the employer reviews its general emergency response policies.			
28	Documented Individual Accommodation Plans	<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"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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.</li> <li>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.</li> <li>5. The steps taken to protect the privacy of the employee's personal.</li> <li>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> </ol>	<p>Hydro Ottawa has created and implemented comprehensive policy and procedure that specifically addresses the legislative obligations of the Ontario Human Rights Code and incorporates best practices in managing non occupational illnesses and injuries. The objective of the policy is to ensure all stakeholders promote an environment that supports injured/ill workers and to state the responsibilities of each stakeholder involved in accommodation planning.</p> <p>Elements outlined in 28 will be clearly outlined and documented through the creation of a step by step process (ref section 29)</p>	Compliant	January 1, 2016

		8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.			
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> <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>	Hydro Ottawa has created and implemented a detailed process that supports the organization's policy statement (referenced in section 28). The objective of this process will be to provide a detailed task list that will guide stakeholders on how to manage accommodations. This includes the how accommodations are requested, supporting documentation required to create an accommodation plan, how this information is kept private, when medical information is required and the purpose of such information, and the frequency in which the plans will be reviewed.	Compliant	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.	At the launch of the performance management cycle Hydro Ottawa informs/reminds people leaders about their obligation to consider and respect the accessibility needs of employees with disabilities and those with individual accommodation plans.	Compliant	January 1, 2016
31	Career Development &	31.(1) An employer that provides career development and advancement to its	At time of registration, participating employees are informed that should they have an	Compliant	January 1, 2016

	Advancement	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.	accommodation requirement to inform the training department.		
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.	Redeployed employees are notified of the company's policies for accommodating employees with disabilities through the memorandum of agreement at time of permanent accommodation.	Compliant	January 1, 2016