

Ordre des enseignantes et des enseignants de l'Ontario

Multi-Year Accessibility Plan

In Accordance with the Regulation 191/11, Integrated Accessibility Standards



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Introduction

The Accessibility for Ontarians with Disabilities Act

- The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) became law in Ontario in June, 2005. Its purpose is to make Ontario barrier-free by 2025 by developing, implementing and enforcing standards for accessibility related to goods, services, facilities, employment, accommodation, and buildings.
- The organizations subject to the AODA include "any agency, board, commission, authority, corporation or other entity established under an Act". As a result, the AODA and its subsequent regulations apply to the Ontario College of Teachers (the "College").

Regulations Under the Authority of the AODA

- The government identified five areas to develop accessibility standards in the form of regulations under the AODA. These five areas are:
 - 1. Customer Service
 - 2. Employment
 - 3. Transportation
 - 4. Information and Communications
 - Built Environment (refers to access to, from and within buildings, and outdoor street spaces such as pedestrian access routes and signal systems).
- Regulation 429/07, Accessibility Standards for Customer Service, was enacted in July 2007 under the AODA to focus on the first area, customer service. The College met the compliance obligations as required under this regulation ahead of the January 1, 2012 deadline.

 Regulation 191/11, Integrated Accessibility Standards was enacted under the AODA in June 2011 and addresses the remaining areas noted above. There are staggered compliance obligations impacting the College through to 2021.

Regulation 191/11, Integrated Accessibility Standards

- Regulation 191/11 establishes the accessibility standards for each area: information and communications, employment, transportation and public spaces. The transportation standards are not applicable to the College.
- The standards set out in this regulation are not a replacement or a substitution for the requirements established under the Human Rights Code.
- Under Regulation 191/11, the College is required to establish, implement, maintain and document a *Multi-Year Accessibility Plan* which outlines the College's strategy to prevent and remove barriers and meet its obligations under the regulation.
- Regulation 191/11 outlines compliance requirements related to the following areas by the noted deadlines:

January 1, 2014:

- establishment of accessibility policies and plans
- 2. ensuring self-service kiosks are accessible, where possible
- 3. ensuring website and web content is accessible to (Web Content Accessibility Guidelines) WCAG 2.0, level A

December 31, 2014:

4. filing deadline for the College's first accessibility report as required under the AODA, with subsequent reports required every three years

January 1, 2015:

- 5. providing training to employees, volunteers and others on the accessibility standards in Regulation 191/11 and on the *Human Rights Code* as it pertains to people with disabilities
- 6. ensuring that processes for receiving and responding to feedback are accessible

January 1, 2016:

- 7. ensuring accessible employment standards are in place including notification of accommodation and disability supports during the recruitment process, processes for developing individual accommodation plans, return to work processes and professional development opportunities that take into account the accessibility needs of employees
- 8. ensuring accessible formats and communication supports are available for the public upon request

January 1, 2017:

 ensuring that any newly constructed or redeveloped public spaces conform to the accessibility standards for the built environment, for example, building sidewalks and service counters

January 1, 2021:

10. ensuring website and web content is accessible to WCAG 2.0, level AA

Multi-Year Accessibility Plan

- This Multi-Year Accessibility Plan, established to meet Ontario's accessible laws by January 1, 2014, outlines the related policies and actions the College has or will have in place to benefit the full range of persons with disabilities by the above-noted deadlines.
- Whether an individual's disability is apparent or not, everyone will continue to be treated with courtesy and respect when they interact with the College.

- This plan is available on the College's website, staff intranet and in an accessible format upon request.
- The College will review this multi-year accessibility plan on a five-year cycle to ensure its ongoing relevance.

Accessibility Reports

 The College submits accessibility reports in accordance with the AODA. These reports outline the College's compliance with relevant accessibility standards in the Act and regulations. The first report was provided in December 2014, then in December 2017, with subsequent reports filed every three years afterwards.

The College Commitment

- The College supports the full integration and inclusion of persons with disabilities as outlined in the AODA and supports the Ontario government's goal to make the province barrier-free by 2025.
- The College is committed to full compliance with the regulations established under the AODA, including Regulation 429/07, Accessibility Standards for Customer Service and Regulation 191/11, Integrated Accessibility Standards.
- The College will comply with the requirements of Regulation 191/11, Integrated
 Accessibility Standards by preventing and
 removing barriers to accessibility and
 meeting accessibility requirements before or
 by the noted deadlines as is required by law.

- The College is a professional organization committed to providing high quality service to its members, its employees and to the public. The College will continue to treat every person with courtesy and respect.
- Employees will engage with College members, fellow employees and the public in a manner that acknowledges the nature of an individual's disability and respects a person's desire for independence, dignity, and equal opportunity.

Regulatory Requirements

Accessible Emergency Information

The College is committed to providing employees, volunteers and clients with publicly available emergency information in an accessible way upon request. Emergency information includes prepared emergency procedures, plans or public safety information.

The following measures are in place to ensure emergency information is available to all persons at the College:

- Emergency information and procedures have been posted on emergency exit doorways on all floors, including public access floors. It is also available on the College's staff intranet and in an accessible format upon request.
- The College's Health and Safety Policy for employees agrees to ensure that legislated measures and best practices prescribed by federal, provincial and municipal legislation, along with the safe work practices and protocols set forth by the College, are adhered to at all times. This policy is available on the College's staff intranet.

Self-Service Kiosks

As of **January 1, 2014**, the College took the following steps with regards to the accessibility for people with disabilities when designing, procuring or acquiring self-service kiosks:

- College staff involved in decision-making related to self-service kiosks are knowledgeable of the AODA requirements.
- Software used in the self-service kiosks is compliant with the AODA requirements by offering accessibility options such as larger font and visuals.

 Self-service kiosks are available at variable heights to accommodate individuals in mobility assistance devices.

Training

The College provides training on the requirements of the accessibility standards in Regulation 191/11 and on the *Human Rights Code* as it relates to people with disabilities to:

- all employees and volunteers
- all persons who participate in developing the organization's policies
- all other persons who provide goods, services or facilities on behalf of the organization.

Training is provided in a way that best suits the duties of employees, volunteers and other individuals.

As of January 1, 2015, the College took the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility standards and human rights code:

- seeking providers to offer training compliant with the requirements in several formats to employees based on their roles and duties
- offering online or in-person training to all College staff, highlighting changes to College policies and procedures as a result of Regulation 191/11
- recording completion of the mandatory training on all College employee files

- developing a protocol to ensure that all staff who begin employment with the College after the training has occurred have the opportunity to participate in this training at a future date
- In 2013, 2017 and 2018, employees involved in document creation received training to learn more about the background and theory of accessibility and how it affects document creation. The training explored Microsoft Word PowerPoint, Excel and PDF features and how to design for those with vision, motor and cognitive impairments.

Additionally, the College will provide, when needed, training sessions to Council members who participate in developing the organization's policies.

Information and Communications

The College is committed to meeting the communication needs of people with disabilities. We consult with people with disabilities, where appropriate, to determine their information and communication needs.

College Website (WCAG 2.0, level A)

As of **January 1, 2014**, the College took the following step to make all new internet websites and web content on those sites conform with WCAG 2.0, level A:

redesigning the College's website including updating documents published on the website after January 1, 2012 to comply with, at a minimum, WCAG 2.0 level A requirements, including reformatting documents for assistive technology software and ensuring ease of readability in larger fonts.

Since **January 1, 2017**, the College has taken the following steps to ensure that all new internet websites and web content on those sites adhere to accessibility standards:

- trained College staff, who develop documents for publication on the website, on how to produce accessible documents
- engaged an on-site contractor and external consultants to audit the College's websites

- (including PDF content) and produce recommendations for improving their compliance
- engaged an external expert to train College web design & development and production staff on web accessibility standards and techniques
- purchased accessibility software to evaluate and track web content for AODA compliance.

College Website (WCAG 2.0, level AA)

The College will take the following steps to make all internet websites and web content conform with WCAG 2.0, level AA (other than providing captions on live videos or audio descriptions for pre-recorded videos) by **January 1, 2021**.

- The College will continue to monitor the development of its web content to ensure compatibility with WCAG 2.0., level AA. Web content will be written in clear language.
- The College also engaged an external expert to assess the overall accessibility of its website, web content and any web-based applications used by the College on its website to ensure compatibility with WCAG 2.0, level AA.

Feedback

As of **January 1, 2015**, the College took the following steps to ensure processes for receiving and responding to feedback are accessible to people with disabilities upon request:

- The College's processes for receiving feedback are accessible to persons with disabilities by including features such as:
 - TTY telephone access
 - screen readers and accessible formats on computers positioned in the College's service centre and library
 - accessible counters and reception area features such as available seating, appropriate clearance for mobility aids and devices
 - College staff trained to provide services compliant with the AODA customer service accessibility standards for persons with disabilities.

- Where the College responds to feedback received, the written response is developed in a format accessible to persons with disabilities. College staff responsible for the development of responses are trained in the formatting of accessible documents. For verbal responses to feedback, College staff in the service centre are trained to provide services compliant with the AODA customer service accessibility standards for persons with disabilities.
- Where an accessible format is requested for a feedback response, College staff will consult with the recipient to ensure the accessible format is appropriate.
- The availability of accessible formats and communications supports to persons with disabilities will be noted on the College's website and in the service centre.

Accessible Formats and Communication Supports

As of **January 1, 2016**, the College took the following steps to provide or arrange for the provision of accessible formats and communication supports for members of the public with disabilities upon request.

- The College's website was updated to outline the process for requesting an accessible format and/or communication support. Information on this process is available in the College's service centre.
- Where a request for a public document in an accessible format is received, the College shall consult with the individual making the request to confirm the suitability of an accessible format or communication support.
- The College shall provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner, and at a cost (where applicable) similar to that charged to other persons.
- Regular updates of the College Style Guide will reflect accessibility considerations and

best practices, where applicable, in the development of College documents.

Employment Standards

The College is committed to fair and accessible employment practices for its employees. As of **January 1, 2016**, the College practices reflect accessible employment standards to meet Ontario's accessible laws.

The College adopted two policies to identify, remove and prevent barriers and increase accessibility for persons with disabilities: the Accessibility Policy for Employment Standards (which includes the Individual Accommodation Plan) and the Return to Work Policy.

Accessibility Policy for Employment Standards

Upon request, the College will accommodate people with disabilities during recruitment and assessment processes, and when people are hired, by:

- posting employment opportunities internally and externally to reflect the College's commitment to the AODA and the availability of accommodation for applicants with disabilities in the recruitment process
- offering accommodation to applicants selected for participation in an assessment or selection process, upon request, in relation to the materials and processes used. The College consults with the applicant to provide or arrange for the provision of a suitable accommodation commensurate with their accessibility needs due to disability.
- updating the signed employment agreement between a new employee and the College to include the College's commitment to the AODA principles and reference the College's policies for accommodating employees with disabilities
- updating the College's Employee Handbook, given to all new employees and available on the intranet, to include accommodation policies for employees with disabilities.
 College employees are advised of changes

to the Employee Handbook through the intranet.

Performance Management

The College took the following steps to ensure the accessibility needs of employees with disabilities are taken into account when using performance management, professional development and redeployment processes:

- The College's policies related to performance management, professional development and redeployment are outlined in the Employee Handbook available to all employees on the staff intranet and to new employees during their orientation. These policies were updated to take individual accommodation plans where they exist, into account.
- The College's performance management software will be compatible with accessibility supports for employees with disabilities. Where the available software does not offer appropriate support for an employee, alternative options will be discussed between the College and the employee.
- Where the College offers professional development, job-shadowing or redeployment/reassignment to employees with disabilities, the accessibility needs of the employee as well as any existing individual accommodation plans will be taken into account.

Individual Accommodation Plans

The College introduced a written process to develop documented individual accommodation plans for employees with disabilities:

- The College policy for developing individual accommodation plans reflects a participatory process involving the employee requesting accommodation, College staff, and if required, external medical evaluations.
- The Individual Accommodation Plan Policy includes information involving required accessible formats and communications supports for information that is needed to

perform that employee's job and information that is generally available to employees in the workplace, individualized emergency response information if required, and any other accommodation provided under the plan.

- The College will provide individualized emergency response information to employees
 who have a disability as required, and where
 the College is aware of the need for accommodation. This information may be shared
 with a person designated to provide assistance to the employee during an emergency
 situation.
- The College's Health and Emergency Planning Policy provides alternatives for employees with disabilities during emergency evacuation situations.
- The Individual Accommodation Plan Policy includes the steps taken to protect the employee's personal information and the frequency with which the individual accommodation plan will be reviewed.

Return to Work Policy

The College developed a written return-to-work process for employees who have been absent from work due to disability and require disability-related accommodation to return to work. The Return to Work Policy:

- outlines the steps to be taken to facilitate the return of employees who were absent because their disability required them to be away from work
- includes the use of individual accommodation plans.

Design of Public Spaces

The College will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces. As applicable to the College, public spaces include:

 outdoor paths of travel, like sidewalks, ramps, curb ramps designed for pedestrian travel and not covered under Regulation 350/06 made under the *Building Code Act*

 service-related elements like service counters and waiting areas.

The College requires that any contract entered into after January 1, 2013 to newly construct or redevelop outdoor paths of travel or service-related elements reflect the requirements of Regulation 191/11.

As of January 1, 2017, the College put the following procedures in place to prevent service disruptions to its accessible service-related elements:

- The service counters and waiting areas at the College's offices on 101 Bloor Street West are accessible to individuals using mobility aids/devices.
- The service counters at the Margaret Wilson Library and book return drop-box are accessible to members and employees with disabilities.
- In the event of a service disruption, the public will be notified via the College's website and signs at the College's office.

Questions about this Multi-year Accessibility Plan?

Questions regarding this plan can be directed to the College's Client Services Unit:

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