



**Integrated Accessibility
Standards Regulation
A guide to developing an
accessibility policy for
organizations with
1-49 employees**



Acknowledgements

This Guide to developing an accessibility policy for Organizations with 1-49 Employees is an initiative of the Global Alliance for Accessible Technologies and Environments (GAATES). GAATES is the leading international not-for-profit organization that brings together individuals and organizations dedicated to promoting accessibility of electronic and communication technologies and accessibility of the built environment. GAATES was incorporated in 2007 by an international consortium dedicated to promoting accessibility worldwide.

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Notes:

Within this guide, the term 'customer' is used to describe the persons who access an organization's goods, services or premises. However, many organizations use different words to describe the members of the public they serve, including customers, clients, members, patients, constituents, parishioners, congregants, patrons, consumers and third party organizations. Under the regulation, providing goods, services and facilities to the public means providing goods, services and facilities that your organization makes available to members of the public.

1.0 What this guide will do for you

This guide will help you understand:

- the policy requirements of the Integrated Accessibility Standards Regulation
- if the requirements apply to your organization
- how to develop an accessibility policy
- how to respond to requests for accessible formats



2. What you need to do under the regulation

The regulation requires private and non-profit organizations with 1-49 employees to develop, implement and maintain at least one policy which outlines how it intends to comply with the accessibility requirements of the Integrated Accessibility Standards Regulation.

The organization's accessibility policy must be implemented before January 1, 2015, and provided in an accessible format on request.



What is an accessibility policy?

In simple terms, an accessibility policy states **what** an organization intends to do to provide appropriate access for its customers . A successful policy will underscore a company's values, identify responsibilities, and declare the company's intention to provide an appropriate level of access.

An organization may have one 'accessibility policy' or a series of policies on accessibility that are integrated into their existing policy structure. Under the Regulation, organizations have the flexibility to create accessibility policies that best fit their existing organizational culture and business practices.

It should be noted that an accessibility policy does not address **how** the organization will achieve the appropriate level of access – the '**how**' will typically be outlined as you plan to meet each of your accessibility requirements.

3. Steps to consider

Step 1: Determine whether your organization has an accessibility policy in place which addresses the requirements of the regulation:

If your organization has a policy or policies that address accessibility in place, use the checklist below to determine whether they appropriately address the requirements of the regulation. If your organization does not currently have an accessibility policy, use the checklist as a guide for developing your own policy.



Steps to consider

My organization's accessibility policy includes a commitment to...	Yes / No
. . . provide access to its goods and/or services in a way that respects the dignity and independence of people with disabilities	
. . . provide, on request, accessible formats and communication supports to our customers with disabilities in a manner that takes into account their disability.	
. . . have regard to the accessibility needs of its customers when designing, purchasing or acquiring self-service kiosks, including interactive electronic terminals and point-of-sale devices intended for public use	
. . . include notification of the availability of accommodation for employment applicants with disabilities, as well as supports for staff with disabilities	
. . . provide, where needs dictate, individualized workplace emergency response information to employees who have a disability	
. . . take into account the accessibility needs of its employees with disabilities when undertaking performance reviews and career development initiatives	
. . . provide training on the Ontario Human Rights Code as it pertains to people with disabilities and accessibility requirements under the AODA, including those for accessible customer service, information and communications, employment practices, transportation and the design of public spaces.	
. . . make new or redeveloped public spaces accessible as required under the Accessibility Standard for the Design of Public Spaces.	

For a detailed list of the requirements that apply to your organization and when, visit Ontario.ca/AccessON and use the AODA Wizard. It will provide you with a customized list of your requirements and the dates they come into effect.

Steps to consider

Step 2: Determine where gaps exist:

Reference the areas of the checklist which are not checked-off, to determine the gaps in your existing accessibility policy that will need to be filled.



For example:

If you noted that the current accessibility policy does not take into account the accessibility needs of employees with disabilities when undertaking performance reviews and career development initiatives you may need to create a policy that states the organization's commitment to providing accommodation to employees with disabilities. For example, your policy may state:

"Our employment practices will include notification of the availability of accommodation for applicants with disabilities, as well as supports for staff with disabilities. Where employee needs dictate, we will provide individualized workplace emergency response information to employees who have a disability. Our performance management and career development processes will take into account the accessibility needs of its employees with disabilities"

Steps to consider

Step 3: Create a policy to resolve gaps in your existing policy:

The regulation provides organizations with the flexibility to create an accessibility policy that fits its corporate structure and business practices. An effective accessibility policy should reflect the nature of an organization's core business, with a particular emphasis on how customers with disabilities can interact with the organization.

An organization must also use reasonable efforts to ensure that their accessibility policy is consistent with the principles of dignity, independence, integration and equal opportunity.

Perhaps the easiest way for an organization to develop an accessibility policy is to start with an example of an existing policy from another organization, ideally within the same business sector, and customize it to reflect the specific nature of the organization's own business.

While the regulation does not require small organizations to document their policies, consider using the sample accessibility policy template (included at the end of this guide) as a starting point.

If your organization offers very unique services, you may wish to develop your own accessibility policy, reflecting the realities of your particular business model. Refer to the 'guide to developing accessibility policies and accessibility plans for organizations with 50 or more employees' for further guidance.



Steps to consider

Step 4: Determine the best way to implement your policy:

Your organization's accessibility policy reflects its commitment to accessibility. The policy identifies where your organization wants to be (the 'destination') once it has fully implemented its accessibility initiatives. Now your organization needs to evaluate its existing business processes and facilities, and then develop a practical approach for implementation. Once the approach is determined, the organization can then begin the journey towards its destination.

Although the regulation does not require small organizations to formally develop an accessibility plan, it will be very difficult for any organization to fully implement an accessibility policy without some sort of planning process.

The plan should identify the actions that will be taken to implement and maintain the accessibility policy or policies you have created. For example, if you committed to providing accessible formats and supports upon request, your plan should identify **how** you will do it. To achieve accessibility in your organization, you may also want to consider which person or department will be responsible for coordinating the actions and what is a realistic timeframe for implementation. It's a good idea to consider short-term, medium-term and long-term actions, based on your organization's needs, and available resources.

AODA Target Date	Accessibility Strategy for Implementation	Company Target Date	Staff Responsible
Jan 1, 2012	Convert existing emergency & public safety information into a format that will allow it to be made available in accessible formats, on request	October 2011	Health & Safety Rep.
	Develop procedure for new/additional information to be available to persons with disabilities at same time as others	December 2011	Health & Safety Rep.

Steps to consider

All accessibility plans are as unique as the organization preparing them. A sample accessibility plan is included at the end of this guide, illustrating a simple accessibility planning format.

An accessibility plan that's right for your business has to be developed within the context of your business structure and available resources. Perhaps the most critical component of any implementation plan is ensuring that the primary 'decision makers' within your organization are aware of the company's accessibility policies, and actively support it.



Step 5: Identify options for providing your accessibility policy in accessible formats

Although the regulation only requires organizations to provide accessible formats 'upon request', acting ahead offers some benefits. It allows you to:

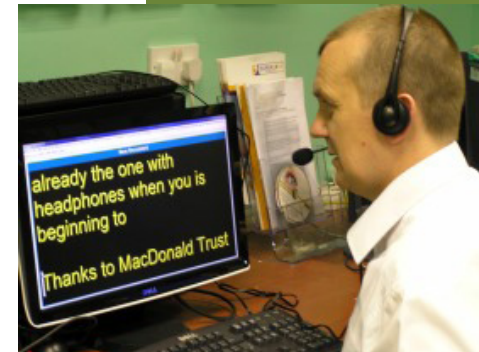
- meet a request more quickly and efficiently
- demonstrate a commitment to your customers that will reflect positively on your organization.

In most cases, providing an accessible format need not be a complicated or time-consuming task. Below is a list of common information formats in which your emergency or public safety information may be currently available . . . along with some possible solutions for accessibility.

Steps to consider

Document	Existing format	Possible types of accessible format
Accessibility policy	Written document	Structured electronic file* which can be used to produce any of the following accessible formats: <ul style="list-style-type: none"> • web page • large print • Braille • Audio (DAISY) version Written descriptions of graphic or photo elements
Accessibility Plan	Written document, possibly with some graphics	

*In addition to text and illustrations, a structured electronic file includes information about the format of a document. Typically information is stored about elements such as titles, section headings, font size and colours, which can be used to easily produce the same document in alternate accessible formats. A typical strategy to include formatting information within an electronic file is to apply a predefined 'Style' to titles, headings, etc., rather than formatting them individually.



When thinking about accessible formats, it is important to consider what your organization is capable of and what it will be able to accomplish 'as soon as practicable' if an alternate format is requested.

4. Where to find more information

- Accessible Information and Communication: A Guide for Small Business provides a comprehensive overview of how to provide information in accessible formats. The Guide can be accessed at www.gaates.org/aic/
- Persons with disabilities themselves can also be a great resource when developing accessible formats and testing their effectiveness.
- Get in touch with some local organizations that serve the community of persons with disabilities such as the Ontario March of Dimes, the CNIB or the Canadian Hearing Society.
- Visit the Government of Ontario website at www.Ontario.ca/AccessON, for more information, tools and educational resources to help you meet your obligations under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).





Policy template for organizations with 1-49 employees

Building accessibility into your organization's policies demonstrates a commitment and first step towards the benefits of being accessible. Whether it's a stand-alone policy or built into a larger policy structure it shows your organizations values, responsibilities and intentions for accessibility.

The Integrated Accessibility Standards Regulation has a broad scope and some parts may not affect all organizations. This template demonstrates an accessibility policy that would suit a small retail business. Other organizations such as those providing transportation or educational institutions may be affected differently and could adjust this template to suit.



Policy template for organizations with 1-49 employees

Accessibility Policies

Your organization

will strive at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are committed to excellence in serving all of our clients and employees, including people with disabilities.

Opportunities

We will give people with disabilities the same opportunity to access our products and services and allowing them to benefit from the same products and services, in the same place and in a similar way as other clients.

Information and communications

When providing information to, or communicating with, a person with a disability, we will provide, on request, the information and communication in a manner that takes into account the person's disability. This includes our publicly available emergency information and feedback processes, such as surveys or comment cards.

Employment

Our employment practices will include notification of the availability of accommodation for applicants with disabilities, as well as supports for staff with disabilities. Where employee needs dictate, we will provide individualized workplace emergency response information to employees who have a disability. Our performance management and career development processes will take into account the accessibility needs of its employees with disabilities.



Policy template for organizations with 1-49 employees

Training

Your organization

will provide training to:

- employees
- volunteers
- persons involved in developing policies for our organization
- all others who provide goods, services or facilities on behalf of our organization

Specifically, the following positions will be trained:

Insert list of positions that will be trained

Training will be provided to staff:

Insert how long after hiring staff will be trained

Training will cover:

- Accessibility requirements from the Integrated Accessibility Regulation
- How the Human Rights Code pertains to persons with disabilities
- Changes that are made to the accessibility policies



Policy template for organizations with 1-49 employees

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- Accessibility requirements from the Integrated Accessibility Regulation
- How the Human Rights Code pertains to persons with disabilities
- Changes that are made to the accessibility policies

Design of Public Spaces

We will incorporate accessibility requirements under the IASR when building or redeveloping a public space identified under the Accessibility Standard for the Design Public Spaces

Modifications to this or other policies

Any policy that does not respect and promote the dignity, independence, integration and equal opportunity of people with disabilities will be modified or removed. Our policies are maintained and updated regularly to reflect our practices, employees and best serve our customers.

Accessibility Plan Sample

Below is a summary of requirements and sample actions to meet requirements under the Integrated Accessibility Standards Regulation. Consider using this as a starting point for building an accessibility plan for your organization.

For more information on strategies to implement accessibility requirements, see the 'Where to find more information' section included in this guide.

Accessible Requirement	Compliance Deadline	Accessibility Strategy for Implementation	Company Target Date	Staff Responsible
Make Emergency & Public Safety Information accessible upon request	Jan 1, 2012	Develop a process for responding to requests for supports and services	June 2012	M. May
		Post a notice on the website and on premises that information is available in a variety of accessible formats		
Provide employees with disabilities with individualized emergency information when necessary	Jan 1, 2012	Send a memo to staff notifying them that individualized emergency information will be provided to employees with temporary or long-term disabilities where necessary	September 1, 2011	M. May
		Consult with staff as required and provide information when necessary	June 2012	M. May

Accessibility Plan Sample

Accessible Requirement	Compliance Deadline	Accessibility Strategy for Implementation	Company Target Date	Staff Responsible
Consider accessibility if acquiring or designing a self-service kiosk	Jan 1, 2012	Review accessible kiosk guidelines and incorporate in purchases where possible	January 1, 2015	M. May
Accessibility Policy	Jan 1, 2015	Develop a statement of organizational commitment	June 2012	J. Lam
		Assess current accessibility policy status and identify regulatory gaps	March 2013	J. Lam
		Draft and adopt updated accessibility policy	December 2013	J. Lam
		Develop a process for responding to requests for alternate formats	June 2014	J. Lam
Accessibility Plan	None	Create and adopt accessibility plan	June 2013	J. Lam
Training	Jan 1, 2016	Research options for providing training	January 2015	K. Smith
		Provide staff training	March 2015	K. Smith
		Track new staff and staff that missed training and coordinate additional training sessions	Ongoing	K. Smith



Accessibility Plan Sample

Accessible Requirement	Compliance Deadline	Accessibility Strategy for Implementation	Company Target Date	Staff Responsible
Accessible Feedback Processes	Jan 1, 2016	Notify customers that feedback processes can be made accessible upon request.	June 2015	K. Smith
		Develop a process for responding to requests for accessible formats or communication supports (see below)	June 2014	
Accessible Formats and Communication Supports	Jan 1, 2017	Develop a process for responding to requests for supports and services	June 2014	M. May
		Post a notice on the website and on premises that information is available in a variety of accessible formats	June 2014	M. May
		Develop criteria to determine what materials will be made into plain language	June 2014	M. May
		Institute a company standard that documents be created in a structured electronic format to allow for easier conversion to alternate formats	June 2014	M. May
		Create promotional materials in alternate formats	January 2015	M. May



Accessibility Plan Sample

Accessible Requirement	Compliance Deadline	Accessibility Strategy for Implementation	Company Target Date	Staff Responsible
Accessible Formats and Communication Supports	Jan 1, 2017	Develop accessible alternates to telephone system for those that are deaf, hard of hearing or cannot speak	March 2016	M. May
		Arrange for human review of the various alternate formats	June 2016	M. May
		Establish third-party contacts for outsourcing materials for captioning, video-description and conversion to Braille or audio as well as any other formatting that is not feasible to do in-house	September 2016	M. May
		Familiarize with sources and time-frames associated with booking sign-language interpreters, interveners or captioners	September 2016	M. May
		Appoint a staff person to be familiar with logistics of planning meetings or presentations where persons with disabilities may be attending	January 2015	M. May
		Acquire a portable assistive listening system	October 2016	M. May

Accessibility Plan Sample

Accessible Requirement	Compliance Deadline	Accessibility Strategy for Implementation	Company Target Date	Staff Responsible
Accessible Formats and Communication Supports	Jan 1, 2017	Test any design collaboration and video conferencing software for accessibility	October 2016	M. May
		Develop an in-house process or make contacts to be able to present design concepts to persons with limited vision or who are blind	October 2016	M. May
Notify employees and potential applicants that accommodations can be made in recruitment processes and in the employment life cycle	January 1, 2017	Send a memo to employees. Post a notice on the company website and incorporate notification in the application process	September 2016	J. Clark
Consider the needs of employees when/ if using performance management, career development and redeployment processes	January 1, 2017		September 2016	J. Clark
Incorporate accessibility requirements under the Accessibility Standard for the Design of Public Spaces	January 1, 2018	Provide design professionals, planners, developers and persons in charge of procurement with the Accessibility Standard for the Design of Public Spaces. Where possible, incorporate requirements into development contracts.	January 1, 2017	M May