# Campus Living Centres
# AODA Multi-Year Plan 2017-2025

## About the 2017 – 2025 AODA Multi-Year Plan

In accordance with the Integrated Accessibility Standards Regulation (IASR), the Accessibility Committee of Campus Living Centres presents the Campus Living Centres AODA 2017 – 2025 Multi-Year Plan. This plan outlines what has been achieved in the area of accessibility and how the residences will meet the remaining accessibility standards, ensuring our residences remains barrier free and continues to be a leader in the area of accessibility in the Ontario private sector.

## AODA Committee Members

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| Rabia Butt | *Manager, Human Resources* |
| Sue Banwait | *Human Resources Generalist* |
| Clarence Chong | *Director, Marketing & Sales* |
| James Tansley | *Director, Physical Resources* |

## Campus Living Centres' Commitment to an Inclusive, Accessible Working Environment

Campus Living Centres is committed to ensuring that all people are provided with a barrier free environment that affords them independence and, where they are treated with dignity. We believe all people at our on-campus residence or off-campus housing have the right to experience inclusion, diversity, and equal opportunity in all aspects of life. We are committed to meeting the needs of persons with disabilities in a timely manner and to being proactive in identifying and removing possible barriers to accessibility and stigma.

## Accessibility at Campus Living Centres

In 2005 the province of Ontario enacted the Accessibility for Ontarians with Disabilities Act. This sweeping legislation mandated accessibility standards in 5 areas: information and communication, customer service, employment, the built environment, and transportation. These standards which are being phased in are intended to ensure a fully accessible province by 2025.

Since the enactment of the AODA in 2005, the five standards have been harmonized into two secondary laws, the Customer Service Standard in 2007 and the Integrated Accessibility Standards Regulation (IASR) in 2011. As a broader private sector organization, Campus Living Centres is working towards full compliance with the standards implemented for the Customer Service Standards, Information and Communication Standards, Transportation and Employment Standards.

## Moving Toward Accessibility

Campus Living Centres' support for students, guests, and staff with disabilities is highly regarded. While we are working diligently to ensure that we are meeting all of the legislated requirements of the AODA, we have strived for more. We are moving from a culture of accommodation to one of inclusivity and accessibility. This approach to supporting individuals with disabilities is more sustainable, given the significant number of individuals with disabilities who are working and studying at the colleges and

universities, but also supports the overall intention of the AODA to create a fully accessible province by 2025. This multi-year plan highlights the work that has been achieved and the work that is in progress.

## Accomplishment and Progress to Date

### Human Resources

Accessibility has been embraced and imbedded into all aspects of Human Resources processes and practices. Accessibility practices are implemented in human resources activities, including hiring, and are in progress in areas of performance management, and workplace accommodations. Hiring practices have been reviewed through an accessibility lens. All new job postings contain an invitation to request accommodation through the interview process if needed. Managers and supervisors ensure their invitation to interviewee's explicitly express a desire to provide accommodation through the interview process if requested. This is tested annually during compliance audits with most senior managers on-site. Human Resources and departments that provide training will continue to use the accessible eLearning template for AODA online learning modules.

### Marketing and Web Service

Campus Living Centres ensures that our websites and the content posted to the website are accessible. External-facing websites and web content controlled directly by Campus Living Centres will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the IASR.

### Moving Forward

The AODA Committee is committed to help the company truly understand what it means to be an inclusive, accessible community.

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# Remaining Standards (2017 – 2025)

## Part I: General Requirements

| Initiative | IASR Requirement | Action | Commencement | Compliance Date |
|---|---|---|---|---|
| **1.1 Establishment of Accessibility Policies** | 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 complete and posted on internal HR intranet<br>• A hard-copy of the policy can be found on-site at all locations | Completed | January 1, 2014 |
| **1.2 Training** | 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. | • Review current training to determine whether existing training could be leveraged for training required by the IASR<br>• Determine budget to provide training<br>• Develop training program to educate staff and managers on AODA legislation, IASR and Human Rights Code<br>• Assess training needs (e.g., separate training for managers and employee levels)<br>• Determine vehicle to deliver training (e.g., online)<br>• Training will be mandatory and training will be available online<br>• Training to incorporate accessible format – review training modes and materials to determine what accessible formats exist and what accessible functions may be incorporated in the training design<br>• Determine mechanism for managing and tracking completion of training | Completed | January 1, 2015 |
| **1.3 Accessibility Plans** | Large organizations shall,<br>(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; | • Established an AODA project team to understand requirements of the IASR<br>• Creation of AODA track responsible for the creation of CLC's Accessibility Plan<br>• Team lead responsible for creation of Accessibility Plan to attend workshop | Completed | January 1, 2014 |

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| | (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. | • To inform Accessibility Plan development – Identified barriers by soliciting stakeholder feedback from CLC people with disabilities and subject-matter experts<br>• AODA committee to meet ongoing until compliance deadlines have all been met | | |
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| **1.4 Consider accessibility when purchasing or designing self-service kiosks** | Consider accessibility when designing, purchasing or acquiring self-service kiosks.<br><br>Examples of self-serving kiosks include:<br>- Paying parking fees<br>- Validating tickets<br>- Building entry screens | • Consider technical features:<br>  o Colour contrast on display screen<br>  o Extra time for people to complete tasks<br>  o Audio instructions<br>  o Voice-activated equipment<br>• Consider structural features:<br>  o Height and stability of kiosk<br>  o Headset jacks with volume control<br>  o Specialized keypads or keyboards (e.g. tactile keyboard)<br>• Consider whether people with mobility aids, such as walkers or wheelchairs, can easily access the kiosk | Completed | January 1, 2014 |

## Part II: Information and Communication Standards

| Initiative | IASR Requirement | Action | Commencement | Compliance Date |
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| **2.1 Make it easy for people with disabilities to provide feedback** | 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. | • Through AODA project team, engage all groups who provide surveys (Marketing, Human Resources, Residence Life) to make them aware of IASR requirements and process for requests for accessible formats<br>• Determine all current feedback surveys and mechanisms at CLC<br>• Conduct assessment/review surveys of feedback processes to ensure accessible formats and current accessibility features<br>• Review/Update current process (SOP) for requesting for accessible formats<br>• As needed, update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual | Completed | January 1, 2015 |

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| | | • Develop understanding of current accessible formats and information and communication and technology tools available at CLC to adequately respond to requests for accessible formats that take into consideration the requestor's disability needs | | |
| **2.2 Accessible Formats & Communication Supports** | 2.2.1 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. | • IT and Marketing to review accessible formats and communication, technology supports currently available at CLC<br>• Review current process (i.e., Emergency Procedures or SOP's) for requesting accessible formats and communication supports<br>• As needed, update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual<br>• Develop communication strategy for educating staff on the availability of and process for requesting accessible formats and communication supports | Completed | January 1, 2016 |
| | 2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. | • Review/update of current Emergency Procedures or SOP's<br>• Understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual's disability needs<br>• Develop a process for responding to, approving or declining a request | Completed | January 1, 2016 |
| | 2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | • Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request | Completed | January 1, 2016 |
| **2.3 Accessible Websites & Web Content** | 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. | • Conducted an assessment of current web functionality to ensure compliance and adequate accessibility features<br>• Ensure Technology and Content Owners (IT and Marketing) are aware of IASR requirements for existing web content<br>• All internet websites and web content moving forward will conform with WCAG 2.0 Level AA, other | Completed | January 1, 2021 |

| | | than, success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Pre-recorded). | | |
| | | • Use site improve, a software program that identifies inaccessible documents so they can be updated | | |

## Part III: Employment Standards

| Initiative | IASR Requirement | Action | Commencement | Compliance Date |
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| **3.1 Recruitment, General** | Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. | • Review of all mechanisms for posting positions (website, internal posting)<br>• Incorporate language on postings and career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available | Completed | January 1, 2016 |
| **3.2 Recruitment, Assessment or Selection Process** | 3.2.1 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.<br><br>3.2.2 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 | • Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request<br>• Encourage and provide more diversity-related training to Talent Attraction on how to engage in conversations to solicit and handle accommodation requests, in accordance with AODA (how to ask for accommodation – develop scripts)<br>• Educate Managers on inclusive selection strategies developed by Ontario Human Rights Commission and on how to implement and request support for accommodation related requests (connect with ERS), in accordance with AODA<br>• Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA | Completed | January 1, 2016 |
| **3.3 Notice to Successful Applicants** | Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities | • Incorporated in offer letter a section regarding CLC's accessibility policies and where to access additional information on CLC internal and external internet | Completed | January 1, 2016 |

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| **3.4 Informing Employees of Supports** | 3.4.1 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 | • Use LMS as a communication strategy to educate and advise employees on CLC's accessibility policies, plans and processes | Completed | January 1, 2016 |
| | 3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment | • Accessibility policies and processes to be Incorporated in onboarding process for Ontario | Completed | January 1, 2016 |
| | 3.4.3 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. | • Develop process and strategy to communicate any policy changes by email and posting on SharePoint | Completed | January 1, 2016 |
| **3.5 Accessible Formats and Communication Supports for Employees** | 3.5.1 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. | • Educated employees and Managers on the availability of accessible format and communication supports; in accordance with AODA<br>• Educated employees and Managers on process for requesting accessible formats and communication supports<br>• Continue to build accessibility awareness through in-person training and e-courses, such as training to respond to the needs of employees with an illness, injury, and/or disability through a Duty to Accommodate. | Completed | January 1, 2016 |
| | 3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support | • Developed a process for consulting with employees to determine accommodation needs (educate PMs to have conversations and escalate ERS)<br>• Develop a process for advising employee of solution | Completed | January 1, 2016 |
| **3.6 Workplace Emergency Response Information** | 3.6.1 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 | • Establish process to provide people in Ontario who request, or for whom CLC is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information. | Completed | January 1, 2012 |

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| | necessary and the employer is aware of the need for accommodation due to the employee's disability. | | | |
| | 3.6.2 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 | • CLC process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the employee to share the information with those designated to provide assistance in the event of an emergency | Completed | January 1, 2012 |
| | 3.6.3 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. | • Upon request, the Manager will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible | Completed | January 1, 2012 |
| | 3.6.4 Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. | • CLC process for creating Individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs | Completed | January 1, 2012 |
| **3.7 Documented Individual Accommodation Plans** | 3.7.1 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. | • Review of current accommodation processes and practices<br>• Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA | Completed | January 1, 2016 |
| | 3.7.2 The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can | • Create an SOP for the development of documented plans that will incorporate the following elements:<br>  o Manner in which employee can request<br>  o Under which circumstances medical is required (Manulife) will be assessing the medical provided | Completed | January 1, 2016 |

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| | participate in the development of the individual accommodation plan.<br>2. The means by which the employee is assessed on an individual basis.<br>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 accommodation can be achieved and, if so, how accommodation can be achieved.<br>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.<br>5. The steps taken to protect the privacy of the employee's personal information.<br>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.<br>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.<br> 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   Work with Manulife (disability partner) to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests<br>    o   Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (Manager, Manulife) and what information may be shared<br>• Educated employees and Managers on the Accessibility policies and processes and procedures for requesting individual plans<br>• Developed change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA | | |
| **3.8 Return to Work Process** | 3.8.1 Every employer, other than an employer that is a small organization, (a) shall develop and have in place a return to work process for its employees who have been absent from work due to a | • Liaise with Manulife to conduct a review of the current return to work process<br>• Update and document return to work process based on gaps and compliance requirements | Completed | January 1, 2016 |

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| | disability and require disability related accommodations in order to return to work; and <br> (b) shall document the process. <br><br> 3.8.2 The return to work process shall, <br> (a) outline the steps the employer will take to facilitate the return to work of employees IASR Requirement Action Status Compliance Date who were absent because their disability required them to be away from work; and <br> (b) use documented individual accommodation plans, as part of the process. | | | |
| | 3.8.3 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 | • The Human Resources Department will support on-site managers in preparing the accommodations with the individual | Completed | January 1, 2016 |
| 3.9 Performance Management | 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. | • Assess current performance review processes to ensure accessibility features are incorporated (i.e., forms accessible, conversations in plain text). <br> • Ensure updated/new performance management processes to be rolled out incorporate accessibility features <br> • Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation | Completed | January 1, 2016 |
| 3.10 Career Development & Advancement | 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 | • Review of current training and professional development materials to determine accessibility features <br> • Ensure all future developed training and materials are developed with accessibility features in mind | Completed | January 1, 2016 |

| | | • Ensure promotion criteria, practices, and processes take into account individual accommodation needs and plans in accordance with AODA<br>• Track career progression of individuals with disabilities | | |
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| career development and advancement to its employees with disabilities. | | | | |
| **3.11 Redeployment** | 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 | • Review and update of current transfer and redeployment practices and processes to ensure accommodation plans are referenced<br>• Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs | Completed | January 1, 2016 |

## Part IV: Design of Public Spaces (Built Environment)

| Initiative | IASR Requirement | Action | Commencement | Compliance Date |
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| **4.1 Design of Public Spaces** | Consult with people with disabilities when designing public spaces, as required by IASR | • We will incorporate accessibility design, criteria and features when procuring or redesigning any space owned or leased by the organization.<br>• Review the paths that employees and customers, and contractors take when creating displays or storing merchandise.<br>• When creating public spaces such as service counters and waiting areas, we will do so in keeping with the requirements set out in the Integrated Accessibility Standards – The Design of Public Spaces Standards and Ontario's Building Code. | Completed | January 1, 2018 |
| | Design and maintain all public spaces to meet the requirements of the Design of Public Spaces standard of the IASR, unless an exception can be made. | • Incorporate the technical requirements into the design of any future newly constructed or significantly renovated spaces where people may form lines, such as reception. | Completed | January 1, 2018 |
| | Comply with Ontario Building Code's barrier-free standards | • Check each CLC property annually | Completed | January 1, 2017 |
| | Reasons for exceptions to the requirements will be documented by the project manager and retained in the CLC corporate file for the project, as well as filed with CLC's AODA Committee | • Create action logs to review status | Completed | January 1, 2017 |

## Part V: Review, Update, and Report

The update of current accessibility policies and the development of a multi-year action plan are not the end of Campus Living Centres' commitment to removing and preventing barriers for persons with disabilities. Campus Living Centres will do the following as it relates to our accessibility policies and multi-year accessibility plan.

1. Continue to conform to the regulatory requirements, whenever possible.
2. Monitor and audit accessibility improvements to ensure continued compliance with the AODA and its corresponding standards.
3. Report on improvements to accessibility for persons with disabilities to Campus Living Centres AODA Committee on an annual basis.
4. Prepare and make publicly available a report on accessibility achievements on an annual basis.
5. Review and update the multi-year accessibility plan every five years.

## For More Information

Questions and/or comments about Campus Living Centres' Accessibility Plan are always welcome.

Please contact Sue Banwait, Human Resources Generalist

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Since 2005, the Accessibility Directorate of Ontario (ADO) has been working with the disability, private and public sectors to develop and enforce accessibility standards, and promote greater accessibility awareness throughout Ontario. Contact the ADO for more information about the AODA, the IASR, the ASCS and resources on how to make Ontario accessible for everyone.

Toll-free: 1-866-515-2025

TTY: 416-325-3408 / Toll-free: 1-800-268-7095

Email: accessibility@ontario.ca

Website: http://ontario.ca/AccessON


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