

## ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

### INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Issued: December 2013

Updated: May 2021, December 2015

#### *Integrated Accessibility Standards, O. Reg. 191/11 ("IASR")*

#### Part I – GENERAL REQUIREMENTS

IASR 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 will be reviewed by the Accessibility Committee and Sr. Management Policy posted on the website	Original policy posted prior to January 1, 2014. Updated policy posted on website December 2015.	January 1, 2014
4	Accessibility Plans	4.(1) Large organizations shall,  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;	Plan will be reviewed by the Accessibility Committee and Sr. Management Plan to be posted on the website	Original plan posted on website prior to January 1, 2014. Updated plan posted	January 1, 2014

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		<p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>		on website December 2015 and May 2021.	
7	Training	<p>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,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>Training modules have been prepared and adapted in a way that best suits the duties of employees, volunteers and other persons. This training covers Ontario's accessibility standards and the Human Rights Code as it pertains to persons with disabilities and complements our Accessible Customer Service Standards training.</p> <p>We also maintain a record of the training we provide.</p>	<p>Training was completed for current staff and volunteers prior to January 1, 2015. Training for new staff and volunteers will be provided as soon as practicable and on an ongoing basis.</p>	January 1, 2015

## PART II – Information and Communications Standards

IASR 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>We welcome feedback, both positive and negative, in regard to the delivery of our services to persons with disabilities, including our patrons and employees. Feedback processes are offered in a variety of ways:</p> <ul style="list-style-type: none"> <li>a) Email</li> <li>b) Phone</li> <li>c) In person</li> <li>d) Mail</li> </ul> <p>Employees may also provide feedback by reaching out directly to their immediate manager or by contacting Human Resources.</p>	<p>Complete</p> <p>Feedback process will be ongoing.</p>	January 1, 2015
12	Accessible Formats & Communication Supports	<p>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,</p> <ul style="list-style-type: none"> <li>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</li> <li>b) at a cost that is no more than the regular cost charged to other persons.</li> </ul>	<p>Upon request and in accordance with the intent of the AODA, we will make available information and provide communication supports in a manner that takes into account the person's accessibility due to disability.</p> <p>For COC performances, we will also have available a supply of larger font printed programs which will be available upon request at the Four Seasons Centre for the Performing Arts. We will put resources in place to convert content from programs into accessible formats, as soon as reasonably possible, upon request.</p>	<p>Complete</p> <p>Support will be ongoing.</p>	January 1, 2016

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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.	When determining the accessible formats and communication supports, staff and volunteers will consult with the person making the request.	Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	<p>We will notify the public about the availability of accessible formats and communication supports through our website  <a href="http://www.coc.ca/AccessibilityPolicies.aspx">http://www.coc.ca/AccessibilityPolicies.aspx</a></p> <p>Staff dealing directly with the public will be made aware of our intent to provide accessible formats and communication supports in a manner that not only takes into account the person's accessibility needs due to a disability but also to address the request in a timely manner.</p>	Complete  Support will be ongoing.	January 1, 2016
14	Accessible Websites & Web Content	<p>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> <p>14.(5) Except where meeting the requirement is not practicable [section 14] applies to web sites and</p>	<p>To conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, the Canadian Opera Company will take the following actions to ensure its websites and web content conform initially at Level A, increasing to Level AA by January 1, 2021.</p> <ol style="list-style-type: none"> <li>1) Canadian Opera Company took action to ensure coc.ca and related websites, and web content, conform with WCAG 2.0 Level A by January 1, 2014.</li> <li>2) Will ensure that all website(s) and web content conforms with WCAG 2.0 Level AA by January 1, 2021.</li> </ol>	Complete and will be updated as needed.	<p><b>January 1, 2014</b></p> <p>New internet websites and web content on those sites must conform with WCAG 2.0 Level A, as required under section 14 of the IASR.</p>

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		web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product, and to web content published on a website after January 1, 2012.			<b>January 1, 2021</b> All internet websites and web content must conform with WCAG 2.0 Level AA, as required under section 14 of the IASR.

### PART III – Employment Standard

IASR 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.	A statement regarding our commitment to accommodations for persons with disabilities will appear on our employment section of our company website. In addition, job advertisements posted through other sources beyond our website, will also have a statement of commitment clearly indicated on each posting. Prospective applicants will know that, if they ask for them, accommodations are available to support them in applying for a job and during the interviewing and assessment process.	Complete  Process will be ongoing.	January 1, 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 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.	When inviting job applicants to participate in the assessment or selection process, hiring managers will notify applicants that, where needed, recruitment-related accommodations for disabilities are available upon request related to the materials and processes that may be used.  This may include notifying applicants through a variety of means such as calling them on the phone, speaking to them in person or sending them an email.	Complete  Process will be ongoing.	January 1, 2016

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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.	When making offers of employment, we will notify the successful applicant of our policies for accommodating employees with disabilities by including a statement in the offer letter.	Complete  Process will be ongoing.	January 1, 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.	We shall inform our new and existing employees of our policies used to support employees with disabilities through our employee handbook. If there is a change to our policies, we will update our employee handbook and notify employees of this change.	Employee handbook update underway. As well, employees are trained during new hire orientation.	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	See 25 (1) above.	See 25 (1) above	January 1, 2016
25		25.(3) Employers shall provide updated information to 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.	See 25 (1) above.	See 25 (1) above	January 1, 2016
26	Accessible Formats &	26.1 In addition to its obligations under section 12, where an employee with a	On request, our managers will consult with employees with	Employee handbook	January 1, 2016

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	Communication Supports for Employees	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.	disabilities to determine their individual needs and then, in consultation with Human Resources, decide on the most appropriate accessible formats or communication supports. We will take into account the needs of the employee with the disability and the capacity of the organization to provide the support.	update underway.	
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Upon receiving the request, we will work with the employee and the individuals/departments responsible for providing the information to deliver a suitable accessible format or communication support.	Employee handbook update underway.	January 1, 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.	Our Emergency Contact form has been amended to allow employees to identify if an emergency response plan is required. We will provide customized workplace emergency response information to help employees who have a disability, if the disability is such that the individualized information is necessary and if the company is aware of the need for accommodation. Consent will be obtained from the requesting employee to disclose the contents of the plan to the individual(s) required to provide assistance	Complete but subject to ongoing review and response when required.	January 1, 2012



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			when responding to the emergency or evacuation.		
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.	See above: 27 (1)	Complete but subject to ongoing review and response when required.	January 1, 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.	See above: 27 (1)	Complete but subject to ongoing review and response when required.	January 1, 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; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	See above: 27 (1)	Complete but subject to ongoing review and response when required.	January 1, 2012
28	Documented Individual	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the	We will put in place a process to develop individual accommodation plans for employees. In doing so,	Complete, but subject to ongoing	January 1, 2016

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	Accommodation Plans	development of documented individual accommodation plans for employees with disabilities.	we will also consult with the employees with respect to arrangements for accessible formats and communication supports. The process for the development of the individual accommodation plans will include the elements outlined in Section 28 (2).	review and response when required.	
28		<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> </ol>	See above: 28 (1)	Complete but subject to ongoing review and response when required.	January 1, 2016

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		5. The steps taken to protect the privacy of the employee's personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 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	29.(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 disability and require disability-related accommodations in order to return to work; and  (b) shall document the process.	We will update our Return to Work process and forms to ensure that all accommodation and plans reflect the requirements of Section 29 in the IASR requirements. If the Return to Work process is a requirement of a work-related injury, we will continue to follow the WSIB process.	This is handled on a case by case bases to meet the individual's specific needs.	January 1, 2016
29		29. (2) The return to work process shall,  (a) outline the steps the employer will take to facilitate the return to work of employees who were absent because	See above: 29 (1)	Return to Work process and forms currently	January 1, 2016

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		their disability required them to be away from work; and (b) use individual documented accommodation plans, as described in section 28, as part of the process.		being updated	
29		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.	See above: 29 (1)	Ongoing	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.	In order to facilitate employee success, we will ensure that the needs of our employees with disabilities are taken into account with respect to any activities related to assessing and improving employee performance, productivity and effectiveness.	Ongoing	January 1, 2016
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.	When providing career development and/or advancement opportunities, we will take into account the needs of our employees with disabilities. Should an employee take on additional responsibilities within his or her current position or advance to a new position or department, we will review and revise any individual accommodation plans, in consultation with the employee, to	Ongoing	January 1, 2016

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			include any appropriate adjustments that may be required to reflect the new role.		
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.	As part of our redeployment process, we will incorporate the accessibility needs and accommodation plans of any employee that is being redeployed to an alternate position and/or department.	Ongoing	January 1, 2016