

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

Part I – General Requirements

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	<p>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.</p> <p>(2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies</p> <p>(3) Every obligated organization, other than a small organization, shall,</p> <p>a) prepare one or more documents describing the policies it developed under subsection (1); and</p> <p>b) make the documents publicly available and, on request, provide them in an accessible format.</p>	<p>Policy posted on R.J. Burnside & Associates Limited (Burnside) website: https://www.rjburnside.com/diversity-equity-inclusion/</p> <p>Included in the Integrated Accessibility Standards Policy under “Commitment” section</p> <p>Statement of organizational commitment is included on the website and links all the documents.</p> <p>Documents can be provided in the following formats, if requested:</p> <ul style="list-style-type: none"> • Accessible HTML • Accessible PDF • In person meeting to discuss concerns of content • Accessible word document • Closed captioning on video 	<p>Completed</p> <p>Completed</p> <p>Completed As requested</p>	January 1, 2014

Section	Initiative	Description	Action	Status	Compliance Date
4	Accessibility Plans	4.(1) Large organizations shall,	Operations attended public workshop December 9, 2013.	Completed	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 their website, if any, and provide the plan in an accessible format upon request; and	Multi-year plan is posted on the Burnside website.	Posted	January 2014
		c) review and update the accessibility plan at least once every five years.	Multi-year plan was updated January 2024. Next review will be January 2029.	Ongoing	January 31, 2024
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,	Employees (including contract staff and students) as well as subcontractors to be assigned the IASR and Human Rights Training course through our third-party online platform-based training provider.	Ongoing	January 1, 2015
		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.			
		(2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons.		Ongoing	

Section	Initiative	Description	Action	Status	Compliance Date
		<p>(3) Every person referred to in subsection (1) shall be trained as soon as practicable</p> <p>(4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis.</p> <p>(5) The Government of Ontario, the Legislative Assembly, every designated public sector organization and every large organization shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<p>Assign appropriate training to new employees / subcontractors during their first week. Staff to complete within three months of employment unless there are extenuating circumstances. Training completion to be monitored through the online training platform by our Human Resources Team.</p> <p>All training certificates and records of training to be housed on the online platform as well as our internal MS Training Certificate Site.</p>	<p>Ongoing</p> <p>Ongoing, as needed</p> <p>Ongoing</p>	

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>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> <p>(2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process.</p> <p>(3) Nothing in this section detracts from the obligations imposed by section</p>	<p>Feedback process in place</p> <p>Determine what accessible formats and communication supports are needed and provide as requested.</p> <p>Publicly posted on the Burnside Website.</p>	<p>Completed</p> <p>Completed</p>	<p>January 1, 2015</p>
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> <p>a) in a timely manner that takes into account the person’s accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p> <p>(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>Accessible formats and communication support we will provide to persons with disabilities upon request at no cost:</p> <ul style="list-style-type: none"> • Accessible HTML • Accessible PDF • In person meeting to discuss concerns of content • Accessible word document • Closed captioning on video 	<p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2016</p> <p>January 1, 2016</p>

Section	Initiative	Description	Action	Status	Compliance Date
		<p>(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p> <p>(4) Every obligated organization that is required to provide accessible formats or accessible formats and communication supports by section 3, 4, 11, 13, 19, 26, 28, 34, 37, 44 or 64 shall meet the requirements of subsections (1) and (2) but shall do so in accordance with the schedule set out in the referenced section and shall do so only to the extent that the requirements in subsections (1) and (2) are applicable to the requirements set out in the referenced section.</p> <p>(5) Obligated organizations shall meet the requirements under this section in accordance with the following schedule:</p> <ol style="list-style-type: none"> 1. For the Government of Ontario and the Legislative Assembly, January 1, 2014. 2. For large designated public sector organizations, January 1, 2015. 3. For small designated public sector organizations, January 1, 2016. 4. For large organizations, January 1, 2016. 5. For small organizations, January 1, 2017. 	Posted on the Burnside website.	Posted	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
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.	Internal		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.	Continuously review WCAG guidelines to be informed of changes and updates.		January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Pre-recorded).

Section	Initiative	Description	Action	Status	Compliance Date
		<p>(4) Designated public sector organizations and large organizations for their internet websites shall meet the requirements of this section in accordance with the following schedule:</p> <ol style="list-style-type: none"> 1. By January 1, 2014, new internet websites and web content on those sites must conform with WCAG 2.0 Level A. 2. By January 1, 2021, all internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ol style="list-style-type: none"> i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded). 			

PART III – Employment Standards

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.	Job Postings and Burnside company website notifies our staff and the public of the availability of accommodation for applicants with disabilities in our recruitment process.	Ongoing	January 1, 2016
23	Recruitment, Assessment or Selection Process	<p>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.</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>	<p>Job applicants are notified that accommodations are available on request.</p> <p>If requested, Burnside will consult with and provide/arrange for a provision of a suitable accommodation.</p>	<p>Ongoing</p> <p>Ongoing</p>	January 1, 2016
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 applicants are notified along with the offer of employment of our policies for accommodating employees with disabilities.	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.	Employees are made aware of supports for 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.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
		(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	New employees are notified via company intranet of our accessibility policies and provisions for accommodations as required.	Ongoing	January 1, 2016
		(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.	See 25.(1)	Ongoing	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	<p>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 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>(2). The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Audit of information specific to departments</p> <p>Audit of regular communications</p> <p>List what the employee may require.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2016</p> <p>January 1, 2016</p>

Section	Initiative	Description	Action	Status	Compliance Date
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 reviewed; and</p> <p>when the employer reviews its general emergency response policies.</p>	<p>Best Practices: Workplace Emergency Response Plan</p> <p>Individual Employee Response Information Form</p> <p>Develop Individual workplace emergency response information for those with disabilities</p> <p>Part of Process</p> <p>Part of Process</p> <p>Part of Process</p>	<p>Completed</p> <p>Ongoing as required</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>	<p>January 1, 2012</p> <p>January 1, 2012</p> <p>January 1, 2012</p> <p>January 1, 2012</p>

Section	Initiative	Description	Action	Status	Compliance Date
28	Documented Individual Accommodation Plans	28.(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.	Form was developed for those requiring individual accommodation plans.	Ongoing	January 1, 2016
		(2) The process for the development of documented individual accommodation plans shall include the following elements: <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 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. 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. 5. The steps taken to protect the privacy of the employee's personal. 6. The frequency with which the individual accommodation plan will be reviewed 	Process includes the required elements.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
		<p>and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>(3) Individual accommodation plans shall,</p> <ul style="list-style-type: none"> a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26; b) if required, include individualized workplace emergency response information, as described in section 27; and c) identify any other accommodation that is to be provided. 			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <ul style="list-style-type: none"> 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. 	Process in place and ongoing as required.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
		(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 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.	Steps are identified and process in place.	Ongoing	January 1, 2016
		(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.	Part of the Process		January 1, 2016
		(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 participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 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. 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	Process includes the required elements.	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
		<p>workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>(3) Individual accommodation plans shall,</p> <p>a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>c) identify any other accommodation that is to be provided.</p>			

Section	Initiative	Description	Action	Status	Compliance Date
29	Return to Work Process	29.(1) Every employer, other than an employer that is a small organization,	Process in place and ongoing as required.	Ongoing	January 1, 2016
		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.			
		(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 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.	Steps are identified and process in place.	Ongoing	January 1, 2016
		(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.	Part of the Process		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.	Part of the Process	Ongoing	January 1, 2016

Section	Initiative	Description	Action	Status	Compliance Date
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.	Part of the current process	Ongoing	January 1, 2016
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.	Should redeployment be used Burnside will take into consideration the accessibility needs of its employees with disabilities and individual accommodation plans.	Ongoing	January 1, 2016