

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005
Multi Year Plan
Battlefield International Inc.



Initial
Release: 8-Feb-2024

Revision: 8-Feb-2024

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action to Compliance	Status
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.	Publish Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy, Accessibility Policy	Complete
		3. (2) Obligated organizations shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policy	(i) Added Policy-012 Customer Service Accessibility Policy on Website (ii) Added copy of Accessibility Policy in lobby	Complete
		3. (3) Every obligated organization shall, (a) prepare one or more documents describing the policies it developed under subsection (1); and	Create and update 5 year plan	Complete
		(b) make the documents publicly available and, on request, provide them in an accessible format	Added 5 year plan on website. Accessible formats available upon request.	Complete
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;	Create and update 5 year plan	Complete
		(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and	4. (1) (b) Include 5year plan on the website.	Complete
		(c) review and update the accessibility plan at least once every five years	Policy to be reviewed at least every 5 years,	We be renewed prior to January 2029

Section	Initiative	Description	Action to Compliance	Status
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>7. (2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) of the legislation shall be appropriate to the duties of employees, volunteers, and other persons.</p> <p>7. (3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>7. (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>7. (5) 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>i) Determine the method of training and the number of training levels (managers, employees). Train current employees.</p> <p>(ii) Ensure orientation of new hires includes required training.</p> <p>(ii) Add "Working Together: The Code and the AODA" module and "Customer Service Standard Module" to New Hire Orientation</p> <p>Training is provided on " Working Together: The Code and the AODA" module and "Customer Service Standard Module?"</p> <p>Training is provided in New Hire Orientation and tracked per Training Matrix</p> <p>When significant updates or changes are made to the Policy-011 Accessibility Policy, communicate to all employees, and maintain a record of communication.</p> <p>Training records are to be maintained which include dates and employees that have completed it in Training Matrix</p>	<p>In-Process of Training Entire Staff on Accessibility Policy Training Package</p> <p>Complete</p>

PART II – Information and Communications Standards

Section	Initiative	Description	Action to Compliance	Status
9	Definitions and Exceptions	<p>9. (2) The information and communications standards do not apply to the following:</p> <p>1. Products and product labels, except as specifically provided by this Part.</p> <p>2. Unconvertible information or communications.</p> <p>3. Information that the obligated organization does not control directly or indirectly through a contractual relationship, except as required under sections 15 and 18.</p> <p>9. (3) If an obligated organization determines that information or communications are unconvertible, the organization shall provide the person requesting the information or communication with,</p> <p>(a) an explanation as to why the information or communications are unconvertible; and</p> <p>(b) a summary of the unconvertible information or communications</p> <p>9.(4) For the purposes of this Part, information or communications are unconvertible if,</p> <p>(a) it is not technically feasible to convert the information or communications; or</p> <p>(b) the technology to convert the information or communications is not readily available.</p>	Added to Policy-011 Accessibility Policy	In-Process of Training Entire Staff on Policy-011 Accessibility POLICY

Section	Initiative	Description	Action to Compliance	Status
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.	Covered Policy-012 Customer Service Accessibility Policy	In-Process of Training entire staff on Policy-012 Customer Service Accessibility Policy
		11. (2) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Provide Accesibility Policy on website and front Lobbys of buildings	WIP
12	Accessible Formats & Communication Supports	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,	Create email template for interviews and employment offers. Indicate no charge is required.	WIP
		(a) in a timely manner that takes into account the person's accessibility needs due to disability; and	Stated in Accessibility Policy	In-Process of Training Entire Staff on Accessibility Policy
		(b) at a cost that is no more than the regular cost charged to other persons		
		12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.		
12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Provide Accesibility Policy on website and front Lobbys of buildings	WIP		

Section	Initiative	Description	Action to Compliance	Status
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.	Emergency Procedure is being created and will include statement to that accessible formats are available.	WIP
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. Update Website to be Compliant to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0,Level AA	WIP - New Website is currently created which will Compliant to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, Level AA

PART III – Employment Standard

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.	Include statement of Accomodation in the job posting to advise individuals about accessibility in the recruitment and selection process.	WIP
----	-----------------------	---	--	-----

Section	Initiative	Description	Action to Compliance	Status
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.	Designate a contact person to handle queries regarding accessibility. Offer accommodation support throughout the recruitment process	WIP - currently working on selection of designate
		23. (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.	If a request is made, the recruitment designate will consult with the individual to ensure the accommodation is suitable.	WIP - Once Designate is picked, they will be made aware of responsibility to consult with individual
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.	Create an email template for employment offers.	WIP
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.	Policy-011 Accessibility Policy is reviewed during the new hire orientation and will be distributed to all employees when updated.	In-Process of Training entire staff on Policy-011 Accessibility Policy
		25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.		

Section	Initiative	Description	Action to Compliance	Status
25	Informing Employees of Supports	25. (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.	Policy-011 Accessibility Policy is reviewed during the new hire orientation and will be distributed to all employees when updated.	In-Process of Training entire staff on Policy-011 Accessibility Policy
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>26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	Included in Accessibility Policy	Complete
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.	Emergency Procedure is being created and will include statement to that accessible formats are available.	WIP

Section	Initiative	Description	Action to Compliance	Status
27	Workplace Emergency Response Information	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.	Emergency Procedure is being created and will include statement to that accessible formats are available.	WIP
		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.		
		27. (4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization;	Included in Policy-011 Accessibility Policy	Complete
		(b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.		
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.	Included in SOP-9-020 Individual Accomodation Plans and HR-FM-013 Employee Request For Workplace Accommodation Form and HR-FM-014 Individual Accomodation Plan	In Process of Training All Managers on SOP-9-020 Individual Accomodation Plans and HR-FM-013 Employee Request For Workplace Accommodation Form and HR-FM-014 Individual Accomodation Plan

Section	Initiative	Description	Action to Compliance	Status
28	Documented Individual Accommodation Plans	<p>28. (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <p>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>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.</p> <p>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.</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>Included in SOP-9-020 Individual Accomodation Plans and HR-FM-013 Employee Request For Workplace Accommodation Form and HR-FM-014 Individual Accomodation Plan</p>	Completed

Section	Initiative	Description	Action to Compliance	Status
28	Documented Individual Accommodation Plans	<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>28. (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>	Included in SOP-9-020 Individual Accommodation Plans and HR-FM-013 Employee Request For Workplace Accommodation Form and HR-FM-014 Individual Accommodation Plan	Completed
29	Return to Work Process	<p>29. (1) Every employer, other than an employer that is a small organization,</p> <p>(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</p> <p>(b) shall document the process.</p> <p>29. (2) The return to work process shall,</p> <p>(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</p>	Included in SOP-9-020 Return to Work and FORM-122 Return to Work Package	In-Process of Training All Managers on SOP-9-020 Return to Work and FORM-122 Return to Work Package

Section	Initiative	Description	Action to Compliance	Status
29	Return to Work Process	<p>(b) use individual documented accommodation plans, as described in section 28, as part of the process</p> <p>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.</p>	Included in SOP-9-020 Return to Work and FORM-122 Return to Work Package	In-Process of Training All Managers on SOP-9-020 Return to Work and FORM-122 Return to Work Package
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.		
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.		
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.		

Part IV.2 – CUSTOMER SERVICE STANDARDS

Section	Initiative	Description	Action to Compliance	Status
80.46	Establishment of Policies	80.46 (1) In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities.	Included in Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy, Accessibility Policy	In-Process of Training Entire Staff on Policies
		80.46 (2) The provider shall use reasonable efforts to ensure that the policies are consistent with the following principles: 1. The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.		
		2. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities.		
		3. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities.		

Section	Initiative	Description	Action to Compliance	Status
80.46	Establishment of Policies	4. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability.	Included in Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy, Accessibility Policy	In-Process of Training Entire Staff on Policies
		80.46 (3) Without limiting subsections (1) and (2), the policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so.		
		80.46 (4) Every provider, other than a small organization, shall prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person.		
		80.46 (5) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (4) are available on request.		
		80.46 (6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.	Policy-12 Customer Service Policy and Accessibility Policy is to available on website and in lobbies of buildings. Accesibility Policy to be posted in lobbies of buildings	WIP

Section	Initiative	Description	Action to Compliance	Status
80.47	Use of Service Animals and Support Persons	<p>80.47 (1) This section applies if goods, services or facilities are provided to members of the public or other third parties at premises owned or operated by the provider and if the public or third parties have access to the premises.</p> <p>80.47 (2) If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.</p> <p>80.47 (3) If a service animal is excluded by law from the premises, the provider shall ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.</p> <p>80.47 (4) If a person with a disability is accompanied by a support person, the provider shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.</p>	Included in Policy-12 Customer Service Policy	Complete

Section	Initiative	Description	Action to Compliance	Status
80.47	Use of Service Animals and Support Persons	<p>80.47 (5) The provider may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, the provider determines that,</p> <p>(a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and</p> <p>(b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises. O. Reg. 165/16, s. 16.</p> <p>80.47 (8) Every provider, other than a small organization, shall prepare one or more documents describing its policies with respect to the matters governed by this section and, on request, shall give a copy of any such document to any person.</p> <p>80.47 (9) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.</p> <p>80.47 (10) The notice required by subsection (9) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances</p>	Included in Policy-12 Customer Service Policy	Complete

Section	Initiative	Description	Action to Compliance	Status
	Notice of Temporary Disruptions	<p>80.48 (1) If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public.</p> <p>80.48 (2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p> <p>80.48 (3) Every provider, other than a small organization, shall prepare a document setting out the steps that the provider will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.</p> <p>80.48 (4) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request.</p> <p>80.48 (5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.</p>	Included in Policy-12 Customer Service Policy	Complete

Section	Initiative	Description	Action to Compliance	Status
80.49	Training for All Staff	<p>80.49 (1) In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> 1. Every person who is an employee of, or a volunteer with, the provider. 2. Every person who participates in developing the provider's policies: 3. Every other person who provides goods, services or facilities on behalf of the provider. <p>80.49 (2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters</p> <ol style="list-style-type: none"> 1. How to interact and communicate with persons with various types of disability.: 2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person. 3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability. 	Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy and Accessibility Policy	In-Process of training entire staff on Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy and Accessibility Policy

Section	Initiative	Description	Action to Compliance	Status
80.49	Training for All Staff	<p>4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.</p> <p>80.49 (3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>80.49 (4) Every provider shall also provide training on an ongoing basis in respect of any changes to the policies described in section 80.46.</p> <p>80.49 (5) Every provider, other than a small organization, shall keep records 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>80.49 (6) Every provider, other than a small organization, shall,</p> <p>(a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and</p> <p>(b) on request, give a copy of the document to any person.</p> <p>80.49 (7) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on request.</p>	Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy and Accssibility Policy	In-Process of training entire staff on Policy-011 Accessibility Policy, Policy-012 Customer Service Accessibility Policy and Accssibility Policy

Section	Initiative	Description	Action to Compliance	Status
80.49	Training for All Staff	80.49 (8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.	Policy-012 Customer Service Policy and Accessibility Policy is to available on website and in lobbies of buildings. Accesibility Policy to be posted in lobbies of buildings	WIP
80.50	Feedback Process Required	80.50 (1) Every provider shall establish a process for receiving and responding to, (a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and	FORM-121 Customer Feedback Form is available on website	Complete
		(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).	Included in Policy-012 Customer Service Policy that feedback will be responded to within 30 days.	Complete
		80.50 (2) The feedback process must specify the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.		
		80.50 (3) Every provider shall ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.		
		80.50 (4) Every provider shall make information about the feedback process readily available to the public.	FORM-121 Customer Feedback Form is available on website	Complete

Section	Initiative	Description	Action to Compliance	Status
80.50	Feedback Process Required	<p>80.50 (5) Every provider, other than a small organization, shall prepare a document describing the feedback process and, on request, shall give a copy of the document to any person.</p> <p>80.50 (6) Every provider, other than a small organization, shall notify persons to whom it provides goods, services or facilities that the document required by subsection (5) is available on request.</p> <p>80.50 (7) The notice required by subsection (6) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.</p>	FORM-121 Customer Feedback Form is available on website	Complete
80.51	Format of Documents	<p>80.51 (1) If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,</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>80.51 (2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	Included in Policy-012 Customer Service Policy	Complete