

INTEGRATED ACCESSIBILITY STANDARDS

LifeLabs Multi Year Plan

PART I – GENERAL REQUIREMENTS

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	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.	January 1, 2014	✓	<p>Policy drafted and ready for approval by Dec 16/13.</p> <p>Roll out policy as controlled document</p>	<p>Complete</p> <p>Complete</p>
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <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>	January 1, 2014	✓	<p>Attended public workshop and started working on draft</p> <p>Meet with AODA working group to complete applicable sections of the plan</p> <p>Post plan to external website</p> <p>AODA working group to meet regularly through the year to review progress on plan, and update plan accordingly, re-post</p> <p>AODA working group to review plan January each year</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Bi-annually</p> <p>Annually</p>

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
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, (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.	January 1, 2015	✓	Determine method of training (classroom, eLearning, blended etc.) and number of training levels (employee, manager, senior leadership) in early 2014. Develop and complete training in later part of 2014.	Complete Complete

PART II – INFORMATION AND COMMUNICATIONS STANDARDS

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	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.	January 1, 2015	✓	<p>Conduct review of all internal and external feedback processes across the organization.</p> <p>Consult with all functional areas to ensure all feedback processes are captured.</p> <p>Determine what accessible formats and communication supports will be provided upon request.</p> <p>Ensure employees and management are aware of the need to provide accessible formats upon request.</p>	<p>Complete</p> <p>Complete</p> <p>Ongoing</p> <p>Complete</p>
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, 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.	January 1, 2016	✓	<p>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</p> <p>Develop process to ensure these formats and supports can be provided in a timely manner.</p> <p>Communicate to employees and management that there will be no additional charges for accessible formats.</p>	<p>Ongoing</p> <p>Complete</p> <p>Complete</p>

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
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.	January 1, 2016	✓	Ensure employees and management are aware of the consultation requirement. Develop protocol for situations where a suitable agreement cannot be made.	Complete Complete
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	January 1, 2016	✓	Identify and implement appropriate notification methods.	Complete
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.	January 1, 2012	✓	Each visitor is given a Visitor Badge upon entry, contains emergency evacuation instructions. LifeLabs employees who have a visitor are accountable for them during evacuation, thus if a visitor requires assistance during evacuation their assigned LifeLabs employee will escort them to an area of refuge as per our policy.	Complete Complete
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content	January 1, 2014 New internet websites and web content on those	✓	Existing website assessed for accessibility.	Complete

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		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>sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded). 		<p>Existing website upgraded to meet WCAG Level A.</p> <p>Continuously review WCAG guidelines to be informed of changes and updates.</p> <p>Updating content to meet WCAG Level AA consistently</p>	<p>Complete</p> <p>Ongoing</p> <p>In progress</p>

PART III – EMPLOYMENT STANDARD

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
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.	January 1, 2016	✓	Determine best methods for internal and external communication of availability of accommodation upon request e.g. on internal and external career sites	Complete
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.	January 1, 2016	✓	Develop scripting to ensure candidates are aware of the availability of accommodations upon request. Create and incorporate consultation process to identify and remove barriers for the candidate. Create process to ensure timely provision of suitable accommodation.	Complete Complete Complete
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.	January 1, 2016	✓	Amend offer letters to incorporate commitment to accessibility and accommodation for employees with disabilities.	Complete

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
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.	January 1, 2016	✓	Identify best methods for informing employees of commitment to providing accommodation and implement communication.	Complete
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	January 1, 2016	✓	Incorporate accessibility commitment in new hire orientation process. Incorporate into MyDevelopment computer-based learning	Complete Complete
25		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.	January 1, 2016	✓	Develop and implement a process to notify employees of policy changes. Process in place for "read and sign off" of updated documents	Complete Complete
26	Accessible Formats & Communication Supports for Employees	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	January 1, 2016	✓	Determine what information/forms/systems etc. are already available in accessible formats and what needs to be adapted upon request.	Ongoing

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		<p>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>			Establish a consultation process to determine what the employee will require	Complete
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	January 1, 2016	✓	<p>Establish a consultation process to determine what the employee will require.</p> <p>Create a process to investigate options identified by the employee as part of the consultation process</p>	<p>Complete</p> <p>Complete</p>
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.	January 1, 2012	✓	<p>As part of the EHS Orientation Checklist for new employees, Personalized plan is developed when required</p> <p>As part of update to the Emergency Response Plan, existing information gathered regarding who requires assistance</p> <p>Employees to advise Manager or Fire Marshall of their need for assistance</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
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.	January 1, 2012	✓	As part of the Emergency Response Plan, employees will complete the Persons Requiring Assistance Form	Complete
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.	January 1, 2012	✓	Emergency Response Plan SOP indicates that any employee requiring assistance or accommodation of any kind must report it as soon as possible to their Manager. Update the Emergency Response Plan Evacuation Binder and develop a personal plan for employee accordingly.	Complete Complete
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization;	January 1, 2012	✓	Each site-specific Emergency Response Plan Evacuation Binder reviewed bi-annually Fire Marshall to make updates as required If employee changes status, it is manager's accountability to update list	Bi-annually Bi-annually Complete

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		(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.	January 1, 2016	✓	Develop process for recruitment and update current process Develop and implement SOP on individualized accommodation plans	Complete Complete
28		28 (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.	January 1, 2016	✓	Captured in Early and Safe Return to Work Process, and Group Benefits Process	Complete

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		<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 information.</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>	January 1, 2016	✓		

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		<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>				
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>	January 1, 2016	✓	Captured in Early and Safe Return to Work Process, and Group Benefits Process	Complete
29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return</p>	January 1, 2016	✓	Captured in Early and Safe Return to Work Process, and Group Benefits Process	Complete

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		(b) to work of employees who were absent because their disability required them to be away from work; and (c) use individual documented accommodation plans, as described in section 28, as part of the process.				
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.	January 1, 2016	✓	Captured in Early and Safe Return to Work Process, and Group Benefits Process	Complete
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.	January 1, 2016	✓	Review current processes for providing performance feedback. Update process to ensure accessibility needs can be met and individual accommodation plans are considered. Captured in Respectful Workplace Policy	Complete Complete
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	January 1, 2016	✓	Review current processes for providing career development and advancement. Update process to ensure accessibility needs can be met and individual accommodation plans are considered.	Complete Complete

AODA Regulation					LifeLabs Action Plan	
Section	Initiative	Regulation Description	Compliance Date	Complied	Action	Status
		as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.			Captured in Respectful Workplace Policy	
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.	January 1, 2016	✓	Review current redeployment process. Update process to ensure accessibility needs can be met and individual accommodation plans are considered. Captured in Respectful Workplace Policy	Complete Complete