

# Multi-Year AODA Accessibility Plan

Updated January 1, 2015

# **Cancer Care Ontario Multi-Year AODA Accessibility Plan - Updated: January 1, 2015**

## **Background**

Cancer Care Ontario (CCO) is a designated public sector organization that is subject to the provisions of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. The *AODA* came into force in 2005. Its purpose is to ensure greater accessibility for Ontarians with disabilities. Since becoming law, CCO has been required to comply with its provisions, which are being phased in between 2010 and 2025.

This Multi-Year Accessibility Plan (Accessibility Plan) outlines CCO's compliance with the *AODA*, sets out CCO's upcoming obligations pursuant to the *AODA*, identifies how CCO will meet those obligations, and provides a status report on the progress of measures taken by CCO. CCO is committed to fulfilling its obligations under the *AODA* and making its premises and services accessible to all Ontarians.

This Accessibility Plan covers the following areas:

1. Overview of the *AODA* and its Accessibility Standards;
2. CCO's Accessibility Committee; and
3. Reporting on Compliance.

## **OVERVIEW OF THE AODA AND ITS ACCESSIBILITY STANDARDS**

The *AODA* came into force in 2005. It permits the government to establish Accessibility Standards in order to remove or prevent barriers for Ontarians with disabilities<sup>1</sup> by 2025. CCO is required to comply with the *AODA* by creating documents, policies, practices, and procedures as prescribed by the Accessibility Standards to accommodate persons with disabilities.

Accessibility Standards currently exist in the following areas:

### **Accessibility Standards for Customer Service**

#### ***Purpose:***

- To ensure all services offered to the public are provided in an accessible manner.

#### ***Application:***

- CCO must ensure that all services it provides to the public, including screening services (e.g., ColonCancerCheck), clinical programs (e.g., PET Program), and public facing events, such as CCO's Annual General Meeting and CCO's public-facing website, are accessible.

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<sup>1</sup> The *AODA* uses the same definition of disability as the *Ontario Human Rights Code*, which includes disabilities of differing severity, both visible and non-visible, as well as permanent and transient disabilities. See *Guide to the Accessibility Standards for Customer Service*, Ontario Regulation 429/07, Accessibility Directorate of Ontario, January 2008.

***Status:***

- Came into force on January 1, 2008 through O. Reg 429/07. As a designated public sector organization, CCO was required to comply with the Customer Service Standards as of January 1, 2010.<sup>2</sup>
- As of January 1, 2010, CCO achieved full compliance with the Customer Service Standards.
- A compliance timeline and summary is set out in **Appendix “A”**.

**Integrated Accessibility Standards (includes Information and Communications Standards, Employment Standards, Transportation Standards and Design of Public Spaces Standards)**

***Purpose:***

- To ensure accessibility in the areas of information and communications, employment, transportation and the design of public spaces.

***Application:***

- CCO will be required to make its information and communications and its HR practices accessible to people with disabilities, and will need to develop a number of policies, plans and procedures to outline its compliance with the Integrated Accessibility Standards.
- As CCO does not provide transportation services, the Transportation Standard does not apply to CCO.
- CCO will be required to ensure that any CCO public spaces that are newly constructed or redeveloped on and after January 1, 2016 meet the requirements set out in the Design of Public Spaces Standards.

***Status:***

- Came into force on July 1, 2011 through O. Reg 191/11.
- Amended on January 1, 2013 by O. Reg 413/12 to include Accessibility Standards for the Design of Public Spaces.
- CCO was required to comply with various requirements under the Integrated Accessibility Standards, which were phased in between January 1, 2012 – January 1, 2015. CCO achieved compliance with such requirements under the Integrated Accessibility Standards, in accordance with the required timelines.
- As of January 1, 2021, CCO will be required to comply with the next phase of requirements under the Integrated Accessibility Standards regarding accessible websites and web content.
- A compliance timeline and summary is set out in **Appendix “B”** and **Appendix “C”**.

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<sup>2</sup> See Section 2 of the *Customer Service Regulation*.

## CCO'S ACCESSIBILITY COMMITTEE

In 2009, CCO formally constituted an Accessibility Committee, with designated representatives from across the organization. The purpose of the Accessibility Committee is to review the *AODA* and to plan, develop and implement processes and procedures to ensure that CCO is meeting its legal requirements under the *AODA* and its regulations. The Accessibility Committee meets on an ad hoc basis as required to review CCO's progress in achieving compliance with the *AODA*, with meetings chaired by CCO's Legal Department. CCO's Legal Department is responsible for presenting updates from the Accessibility Committee to CCO's Enterprise Services Committee, CCO's Executive Team (ET), the Corporate Governance and Nominating Committee (CGNC), CCO's Board of Directors and CCO Staff.

## REPORTING

The following chart sets out CCO's reporting requirements under the *AODA* and Accessibility Standards:

<b>Legislation</b>	<b>Requirement</b>	<b>Deadline</b>	<b>Responsibility</b>	<b>Status</b>
<b>Accessibility Report (s.14, <i>AODA</i>; s. 86.1, <i>Integrated Accessibility Standards Regulation</i>)</b>	First Accessibility Report required to be filed with the Ministry of Community and Social Services	March 31, 2010	Legal	COMPLETED
<b>Accessibility Report (s.14, <i>AODA</i>; s. 86.1, <i>Integrated Accessibility Standards Regulation</i>)</b>	Second Accessibility Report required to be filed with the Ministry of Economic Development, Trade and Employment ("MEDTE")	December 31, 2013	Legal	COMPLETED
<b>Accessibility Report (s.14, <i>AODA</i>; s. 86.1, <i>Integrated Accessibility Standards Regulation</i>)</b>	Subsequent Accessibility Reports required to be filed <u>every two years</u> thereafter	December 31, 2015 (and every two years thereafter)	Legal	TO BE COMPLETED by December 31, 2015.
<b>Accessibility Plans (s. 4, <i>Integrated Accessibility Standards Regulation</i>)</b>	Establish, implement, maintain and document a multi-year accessibility plan (to be reviewed and updated at least once every five years)	January 31, 2013	Legal	<b>COMPLETED</b> - 2012-2013 Accessibility Plan drafted, and reviewed by CCO's Accessibility Committee and by persons with disabilities who self-selected to assist CCO in the completion of the plan in <b>Nov, 2012</b> .
<b>Accessibility Plans (s. 4, <i>Integrated Accessibility Standards Regulation</i>)</b>	Establish, review and update accessibility plan in consultation with persons with disabilities and CCO's Accessibility Committee.	January 31, 2013	Legal and HR	<b>COMPLETED / ONGOING</b>
<b>Accessibility Plans (s. 4, <i>Integrated Accessibility</i>)</b>	Post accessibility plan on CCO's website and provide the plan in an	January 31, 2013	Web and Digital Services	COMPLETED / ONGOING - Plan posted on CCO's

<b>Legislation</b>	<b>Requirement</b>	<b>Deadline</b>	<b>Responsibility</b>	<b>Status</b>
<i>Standards Regulation</i>	accessible format upon request.			external website in Dec, 2012. Updated plan posted in January 2014 and January 2015.
<b>Annual Status Reports (s.4(3), Integrated Accessibility Standards Regulation)</b>	Prepare an annual status report on the progress of measures taken to implement the accessibility plan.	January 1, 2014 and annually.	Legal	Completed for January 1,2014 and January 1, 2015.
<b>Annual Status Reports (s.4(3), Integrated Accessibility Standards Regulation)</b>	Post the status report on CCO's website and provide the report in an accessible format upon request.	January 1, 2014 and annually.	Web and Digital Services	Completed for January 1,2014 and January 1, 2015.

## Appendix “A”

### *Customer Service Standards: Timeline to Completion Chart*

Requirement	CCO Activity	Deadline	Responsibility	Status	Compliance
<b>Draft Required Documentation</b>	Develop CCO Customer Service policy / procedures for the compliance with the Customer Service Standards.	Jan 1, 2010	Legal	<b>COMPLETED.</b> As of January 2015, CCO’s <i>Customer Service Policy and Procedures</i> has been incorporated into CCO’s combined <i>AODA Policy and Procedures</i> .	Yes
<b>Make CCO’s external website accessible (www.cancercare.on.ca)</b>	Make all public information on CCO’s external website accessible to persons with disabilities.	Jan 1, 2010	Web and Digital Services	<b>COMPLETED, continuing on an as need basis</b>	Yes
<b>Make any other CCO designated, maintained and hosted public facing website accessible</b>	Make all public information on any other CCO designated, maintained and hosted public facing website accessible to persons with disabilities.	Jan 1, 2010	Web and Digital Services	<b>COMPLETED, continuing on an as needed basis</b>	Yes
<b>Make CCO’s Annual General Meeting (“AGM”) accessible</b>	Make all AGMs accessible by ensuring that all CCO correspondence and invitations to the AGM include a provision stating that alternate accommodation is available upon request and all AGM-related documents are available in alternate formats upon request.	Jan 1, 2010	Communications	<b>COMPLETED, continuing on an as needed basis –</b> Communications (External Events Coordinator) ensures that selected venue is accessible, that all invitations include statement regarding accessibility, and that any identified accessibility needs are addressed.	Yes
<b>Make CCO’s public events accessible</b>	Make all CCO events designated by Communications as being “for the public” accessible by ensuring that all CCO correspondence and invitations to public events include a provision stating that alternate accommodation is available upon request and all event-related documents are available in alternate formats upon request.	Jan 1, 2010	Communications	<b>COMPLETED, continuing on an as needed basis -</b> Communications (External Events Coordinator) ensures that selected venues are accessible, that all invitations include statement regarding accessibility, and that any identified accessibility needs are addressed.	Yes
<b>Make CCO’s public-facing portion of the Colon-Cancer Check accessible</b>	Make all CCO correspondence to the public for the Colon-Cancer-Check program accessible by including a provision that alternate formats of the	Jan 1, 2010	Prevention & Cancer Control	<b>COMPLETED, continuing on an as needed basis</b>	Yes

Requirement	CCO Activity	Deadline	Responsibility	Status	Compliance
	correspondence are available upon request.				
<b>Make CCO's public-facing portion of the OBSP and OCSP accessible</b>	Accessibility of the OBSP affiliate websites are the responsibility of the affiliate. Make all OBSP and OCSP correspondence to the public that is CCO's responsibility accessible by including a provision that alternate formats of such correspondence are available upon request.	Jan 1, 2010	Prevention & Cancer Control	<b>COMPLETED, continuing on an as needed basis</b>	Yes
<b>Make CCO's public-facing portion of Aboriginal Programs accessible</b>	Make all CCO Aboriginal Programs accessible by including an accessibility icon on the applicable CCO-maintained websites and by including a provision in all CCO correspondence to the public dealing with these programs that alternate formats of such correspondence are available upon request.	Jan 1, 2010	Aboriginal Cancer Control, Web and Digital Services	<b>COMPLETED, continuing on an as needed basis</b>	Yes
<b>Include the concept of accessibility in CCO procurements to the public</b>	When procuring goods/services that will be provided to the public, CCO shall ensure that all procurement documents specify that the winning vendor shall perform its services in accordance with the customer service standards as set out in the <i>AODA</i> and the evaluation process shall provide for the evaluation of proposals in respect of the <i>Customer Service Standards</i> .	Jan 1, 2010	Legal, Procurement	<b>COMPLETED, continuing on an as needed basis</b> – template legal agreements include a provision requiring successful vendor to be knowledgeable of the applicable <i>AODA</i> requirements and to perform its services in accordance with the <i>AODA</i> and the <i>Customer Service Standards</i> .	Yes
<b>Make notice forms for CCO website re: temporary disruptions</b>	"Notice of temporary disruption form" to be created and posted at CCO's public premises at 620 University when access to such premises are temporarily disrupted (such public notice might relate to facility renovations or repairs, including maintenance of elevators or accessible washrooms).	Jan 1, 2010	University Health Network (UHN)	<b>COMPLETED, continuing on an as needed basis</b>	Yes

<b>Requirement</b>	<b>CCO Activity</b>	<b>Deadline</b>	<b>Responsibility</b>	<b>Status</b>	<b>Compliance</b>
<b>Training</b>	AODA training to be provided to all CCO Staff via the <i>e-accessibility</i> module  CCO will also keep a record of all members of CCO staff who have completed training.	Training must be provided before Jan 1, 2010 for all existing CCO staff and must thereafter be provided on an ongoing basis to all new CCO staff.	Legal	<b>COMPLETED, continuing on an as needed basis</b> – Initial training for CCO Staff provided in Dec, 2009 and completed by CCO Staff by Jan 1, 2010.	Yes
<b>Implement Feedback Process</b>	A feedback process needs to be developed so that individuals can provide CCO with feedback on its provision of accessible services to persons with disabilities.	Jan 1, 2010	Web and Digital Services	<b>COMPLETED</b>	Yes
<b>Notify public that documents required under the <i>Customer Service Standards</i> are available from CCO upon request</b>	CCO's external website needs to include a statement that CCO's Customer Service Documents are available to the public upon request.	Jan 1, 2010	Web and Digital Services	<b>COMPLETED</b>	Yes
<b>Dissemination of customer service standards and the AODA to CCO Staff</b>	CCO to communicate to new and existing CCO staff the requirements of the AODA Customer Service Standards.	Initial roll out prior to Jan 1, 2010	Communications, Legal	<b>COMPLETED, continuing on an as needed basis</b>	Yes
<b>TTY</b>	TTY number to be put in place	Jan 1, 2010	Technology Services & Facilities	<b>COMPLETED</b>	Yes



## Appendix “B”

### *Integrated Accessibility Regulation: Timeline to Completion Chart*

#### PART 1 – General Requirements

<b>Requirement</b>	<b>Tasks</b>	<b>Deadline</b>	<b>Responsibility</b>	<b>Status</b>	<b>Compliance</b>
<b>Establishment of accessibility policies (s. 3)</b>	Prepare one or more written documents describing policies on the Integrated Accessibility Standards and CCO’s commitment to achieving accessibility.	January 1, 2013	Legal	COMPLETED - Accessibility Policy drafted, and reviewed by CCO’s Accessibility Committee in <b>Nov, 2012.</b>	Yes
<b>Establishment of accessibility policies (s. 3)</b>	Make the documents publicly available, and provide in an accessible format upon request.	January 1, 2013	Web and Digital Services, Communications	COMPLETED - Accessibility Policy posted on CCO’s external and internal websites in <b>Dec, 2012.</b>  As of January 2015, CCO’s <i>Accessibility Policy</i> has been incorporated into CCO’s combined <i>AODA Policy and Procedures</i> and posted on CCO’s website.	Yes
<b>Procuring or acquiring goods, services or facilities (s. 5)</b>	Incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable.	January 1, 2013	Procurement	COMPLETED – Procurement Policy, Procurement Documents, and legal agreements refer to CCO’s obligations under the <i>AODA</i> and Accessibility Standards. Accessibility Project to be piloted by CCO working group, from January to April 2013. Pilot to inform the development of a procurement	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
				process that will provide guidance on implementing the procurement requirements of the AODA.	
<b>Training (s. 7)</b>	Provide training to all CCO employees and volunteers on the requirements of the Accessibility Standards and on the <i>Human Rights Code</i> . The training is to be appropriate to the duties of the individuals receiving the training.	January 1, 2014	Legal	<b>COMPLETED</b> – CCO-wide training incorporating the <i>Integrated Accessibility Standards</i> was rolled out on April 2, 2013.	Yes
<b>Training (s. 7)</b>	Training is to be provided to all other persons who provide goods and services on behalf of CCO.	January 1, 2014	Procurement, Legal	Successful 3 <sup>rd</sup> party service providers to be provided with online training on the AODA prior to commencement of services for CCO. A clause to this effect has been included in all 3 <sup>rd</sup> party service contracts.	Yes

## **Part 2 – Information and Communication Standard**

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
<b>Feedback (s. 11)</b>	Processes for receiving and responding to feedback shall be accessible through the provision or arranging for the provision of accessible formats and communication supports.	January 1, 2014	Web and Digital Services	<b>COMPLETED</b>  Individuals can provide feedback to CCO either by calling the public inquiry line (accessible via TTY) or by submitting a Contact Form.	Yes
<b>Feedback (s. 11)</b>	Shall notify the public about the availability of accessible formats and communication supports.	January 1, 2014	Web and Digital Services	<b>COMPLETED</b>  There is a statement to this effect on CCO's external website.	Yes
<b>Accessible formats and</b>	Shall, upon request, provide or	January 1, 2015	Communications, Web and Digital	<b>COMPLETED – ONGOING.</b>	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
<b>communication supports (s. 12)</b>	arrange for the provision of accessible formats and communication supports for all public CCO information and communications for persons with disabilities.		Services	CCO Communications continues to manage any requests for accessible formats in accordance with CCO's <i>AODA Policy</i> .	
<b>Accessible formats and communication supports (s. 12)</b>	Shall notify the public about the availability of accessible formats and communication supports.	January 1, 2015	Communications, Web and Digital Services	<b>COMPLETED – ONGOING.</b> CCO's website contains a statement explaining how the public may make requests for accessible formats to CCO. CCO Communications continues to review all CCO public information and communications to ensure that all such information and communications include a statement that they are available in accessible formats upon request.	Yes
<b>Accessible websites and web content (s. 14)</b>	Internet websites and web content (excluding live captioning and audio description) must conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA. Note: This applies to all web content published on a website <b>after January 1, 2012.</b>	<b>Jan 1, 2014 (Level A)</b> <b>Jan 1, 2021 (Level AA)</b>	Web and Digital Services, Communications	<b>COMPLETED current requirements, continuing on an as needed basis</b> Sites developed after Jan 2012 are compliant to minimum Level A. CCO has taken steps to improve the accessibility of older sites.	Yes
<b>Emergency procedure, plans or public safety information (s. 13)</b>	Any CCO emergency procedures, plans or public safety information that	January 1, 2012	Facilities, Web and Digital Services, HR	<b>COMPLETED, continuing on an as needed basis</b>  CCO's Fire Safety	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
	are made available to the public must be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.			and Emergency Evacuation Procedures now include a statement that they are available in alternate formats upon request.	

### **Part 3 – Employment Standard**

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
<b>Employee Recruitment, Selection and Support (ss. 23- 26)</b>	CCO shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.	January 1, 2014	HR (in consultation with UHN)	<b>COMPLETED</b> CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
<b>Employee Recruitment, Selection and Support (ss. 23- 26)</b>	During a recruitment process, CCO shall notify invited applicants that accommodations are available upon request in relation to the materials or processes to be used. If accommodation is requested, CCO shall consult with the applicant to ensure suitable accommodation respecting the applicant's disability.	January 1, 2014	HR (in consultation with UHN)	<b>COMPLETED</b> CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
<b>Employee Recruitment, Selection and Support (ss. 23- 26)</b>	Successful applicants shall be notified of CCO's policies for accommodating employees with disabilities.	January 1, 2014	HR (in consultation with UHN)	<b>COMPLETED</b> CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
<b>Employee Recruitment, Selection and Support (ss. 23- 26)</b>	As soon as practicable after they begin their employment, employees shall be informed of CCO's policies	January 1, 2014	HR (in consultation with UHN)	<b>COMPLETED</b> CCO currently has a number of processes in place to ensure that accessibility is incorporated	Yes

<b>Requirement</b>	<b>Tasks</b>	<b>Deadline</b>	<b>Responsibility</b>	<b>Status</b>	<b>Compliance</b>
	supporting employees with disabilities. Changes to CCO's policies shall be communicated to employees.			throughout the recruitment process.	
<b>Employee Recruitment, Selection and Support (ss. 23- 26)</b>	Where requested, CCO shall consult with an employee with a disability to ensure provision of accessible formats and communication supports for information needed to perform the employee's job and other information generally available to employees in the workplace.	January 1, 2014	HR (in consultation with UHN)	<b>COMPLETED</b> CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
<b>Workplace emergency response information (s.27)</b>	Provide individualized workplace emergency response information to employees who have a disability, where necessary.	January 1, 2012	Facilities, HR	<b>COMPLETED, continuing on an as needed basis</b> CCO's Fire Safety Plans and Emergency Evacuation Procedures were revised in Dec, 2011 to include an evacuation procedure for CCO Staff requiring additional assistance. CCO Staff requiring evacuation assistance can complete and send a copy of the Emergency Evacuation Assistance Request Form to Occupational Health Services (OHS).	Yes
<b>Individual accommodation plans (s. 28)</b>	CCO shall have a written process for developing documented individual accommodation plans (IAPs) for employees with disabilities.	January 1, 2014	HR (in consultation with UHN)	<b>COMPLETED</b>	Yes

<b>Requirement</b>	<b>Tasks</b>	<b>Deadline</b>	<b>Responsibility</b>	<b>Status</b>	<b>Compliance</b>
<b>Return to work process (s. 29)</b>	CCO shall have a return to work process for employees who have been absent from work due to a disability and require accommodation in order to return to work.	<b>Jan 1, 2014</b>	HR (in consultation with UHN)	<b>COMPLETED</b>	Yes
<b>Performance management (s. 30)</b>	CCO shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans in the performance management process.	<b>Jan 1, 2014</b>	HR (in consultation with UHN)	<b>COMPLETED</b>	Yes
<b>Career development (s. 31)</b>	CCO shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans in the career development process.	<b>Jan 1, 2014</b>	HR (in consultation with UHN)	<b>COMPLETED</b>	Yes

## Appendix “C”

### Upcoming Integrated Accessibility Regulation Requirements At-a-Glance

Date	Category	Requirement
January 1, 2012	Information and Communications	Emergency Procedures, Plans and Public Safety documents to be available in accessible formats
January 1, 2012	Employment Standards	Individualized workplace emergency response information for employees with disabilities
January 1, 2013	General	<ul style="list-style-type: none"> <li>• Develop, implement and maintain policies on the Integrated Accessibility Standards and CCO’s commitment to achieving accessibility. Policies must be publicly available in accessible formats upon request</li> <li>• Review accessibility plans in consultation with persons with disabilities</li> <li>• Establish accessibility criteria for the procurement of goods, services and facilities</li> </ul>
January 1, 2014	General	Provide training to CCO Staff on the Integrated Regulations
January 1, 2014	Information and Communications	<ul style="list-style-type: none"> <li>• Feedback processes accessible to persons with disabilities</li> <li>• All new internet websites and their content must conform with WCAG 2.0 level A</li> </ul>
January 1, 2014	Employment Standards	<ul style="list-style-type: none"> <li>• Recruitment</li> <li>• Accessible formats and communication supports for all CCO employees with disabilities</li> <li>• Individual accommodation plans</li> <li>• Return to work process</li> <li>• Performance management</li> <li>• Career development and advancement</li> </ul>
January 1, 2015	Information and Communications	Accessible formats and communication supports for all CCO communications and information
January 1, 2021	Information and Communications	All existing websites and their content must conform to WCAG 2.0 level AA

Cancer Care Ontario (CCO) is an organization committed to ensuring accessible services and communications to individuals with disabilities. To receive any part of this document in an alternate format, please contact CCO’s Communications Department at: 1-855-460-2647, TTY (416) 217-1815, or [publicaffairs@cancercare.on.ca](mailto:publicaffairs@cancercare.on.ca).