

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005 (AODA)
PENFINANCIAL CREDIT UNION – INTEGRATED ACCESSIBILITY STANDARDS – MULTI YEAR PLAN**

Part 1 General Requirements

Initiative	Description	Action	Status	Compliance Date	Responsible
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, a) all employees and volunteers; b) all persons who participate in developing the organization’s policies; c) all other persons who provide good, services or facilities on behalf of the organization (not cleaning staff, etc.)	All staff to be trained on Integrated Standards (must cover a high-level on standards of each requirement). CuSource developing training for all employees and will consider providing this training to all. CU Training updated training April 2021	Complete Complete	January 1, 2015 April 1, 2021	Human Resources
Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	Policy drafted and will be presented to Governance Committee. Policy to be approved by Board of Directors.	Complete	January 1, 2014	Human Resources
Accessibility Plan	4.(1) Large organizations shall, establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet it requirements under this Regulation.	Plan drafted. Updated April 2021	Drafter Complete	January 1, 2014 April 2021	Human Resources / Facilities

Part 1 General Requirements

Initiative	Description	Action	Status	Compliance Date	Responsible
	a) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and b) review and update accessibility plan at least once every five years				
Self-Serve Kiosks	6. (2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring, or acquiring self-service kiosks.	All kiosks have been identified and will consider accessibility requirements going forward when purchasing or replacing existing kiosks.	Ongoing	January 1, 2014	Facility/ATM
Accessibility Report	8. Every organization to whom an accessibility standard applies shall file an accessibility report with the director annually	File annual accessibility report as required by AODA Compliance Reporting Due Dec 31, 20 Extended June 30, 2021	Ongoing	January 1, 2014 June 30, 2021	Human Resources

Part 2 Information & Communication Standards

Initiative	Description	Action	Status	Compliance Date	Responsible
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.	ProLearning has a web accessibility guide for \$199/\$299 if assistance needed. Ensure website and app conforms with the WCAG 2.0	Ongoing Complete	January 1, 2014 (for all new content added from January 1, 2014 onwards) January 1, 2021 – Extended to June 30, 2021	Marketing/IT
Feedback	11.(1) Every obligated organization that has processes for receiving and responding to	Will provide alternative formats/methods, upon request.	Ongoing	January 1, 2015	Marketing

Part 2 Information & Communication Standards

Initiative	Description	Action	Status	Compliance Date	Responsible
	feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	As per policy.			

Part 3 Employment Standard

Initiative	Description	Action	Status	Compliance Date	Responsible
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.	Add statement to job postings (i.e. we are committed to providing accommodations to people with disabilities and will meet needs upon request).	Ongoing	January 1, 2016	Human Resources
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 that applicant’s accessibility needs due to disability.	Communicate to applicants that accommodations are available if requested. Add wording to Hiring policy within Personnel Policy Manual.	Ongoing	January 1, 2016	Human Resources
Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful	Put statement in offer letter (i.e. we are committed to accommodating people with	Ongoing	January 1, 2016	Human Resources

Part 3 Employment Standard

Initiative	Description	Action	Status	Compliance Date	Responsible
	applicant of its policies for accommodating employees with disabilities.	disabilities. More information will be shared with you during the orientation process).			
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.	Review AODA policies annually with all employees and sign off. Review any additions to policies.	Ongoing	January 1, 2016	Human Resources
Informing Employees of Supports	25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Same as above	Ongoing	January 1, 2016	Human Resources
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.	Same as above.	Ongoing	January 1, 2016	Human Resources
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 provide or arrange for the provision of accessible formats and communication supports for, a) information that is needed in order to perform the employee's job; and b) information that is generally available to employees in the workplace	Accessible formats and communication supports will be provided if requested.	Ongoing	January 1, 2016	Human Resources

Part 3 Employment Standard

Initiative	Description	Action	Status	Compliance Date	Responsible
Accessible Formats & Communication Supports for Employees	26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Consult with employee making the request to review possible accessible formats and communication supports.	Ongoing	January 1, 2016	Human Resources
Workplace Emergency Response Information	27. (1) All employers will prepare for the specific needs that employees with disabilities may have in emergency situations	As per policy	Completed	January 1, 2012	Human Resources / IT
Documented Individual Accommodation Plans	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. 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.	As per policy.	Completed	January 1, 2016	Human Resources

Part 3 Employment Standard

Initiative	Description	Action	Status	Compliance Date	Responsible
	<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> <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>				
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>	Return to work process created	Complete	January 1, 2016	Human Resources
Return to Work Process	<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> <p>b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	Return to work process created	Complete	January 1, 2016	Human Resources

Part 3 Employment Standard

Initiative	Description	Action	Status	Compliance Date	Responsible
Return to Work Process	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.	As per policy	Complete	January 1, 2016	Human Resources
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.	As per policy	Complete	January 1, 2016	Human Resources
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	As per policy	Complete	January 1, 2016	Human Resources
Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	As per policy	Complete	January 1, 2016	Human Resources