



## AODA Compliance Checklist

The purpose of this checklist is to summarize the most common legal requirements for private sector organizations under the *Accessibility for Ontarians with Disabilities Act* (AODA). The AODA requirements summarized below are either currently in effect or will take effect on January 1, 2015. This checklist is not exhaustive. Depending on the nature of the organization, there may be additional requirements that should also be considered. A number of additional requirements will come into force at a later date. For further resources, including helpful links and Osler Updates, see our [AODA resource page](#).

The Ministry of Economic Development, Trade and Employment has also created an [AODA Compliance Wizard](#) to assist organizations in determining which AODA requirements apply to them.

For more information, contact [Jason Hanson](#), [Allan Wells](#), [Sven Poysa](#) or [Rhonda Shirreff](#).

### REPORTING REQUIREMENTS

- Organizations with 20 or more employees in Ontario were required to file an accessibility compliance report with the Ministry by December 31, 2012 to answer [these questions](#) regarding their compliance with the Accessibility Standards for Customer Service (Customer Service Standards).
- Organizations with 20 or more employees in Ontario are required to file a second accessibility compliance report by December 31, 2014, as follows:
  - Organizations with 20 to 49 employees in Ontario are required to answer questions regarding their requirements under the Customer Service Standards; and
  - Organizations with 50 or more employees in Ontario are required to answer questions regarding their requirements under the Customer Service Standards and the Integrated Accessibility Standards (Integrated Standards). These organizations are also required to file an additional accessibility compliance report every three years.
- The accessibility compliance reports can be filed [online](#).

### KEY REQUIREMENTS OF THE CUSTOMER SERVICE STANDARDS

#### Policies & Procedures

- Prepare policies, practices and procedures on how goods or services will be provided to people with disabilities in a manner consistent with the principles of independence, dignity, integration and equality of opportunity. Organizations with 20 or more employees in Ontario must document their policies, practices and procedures.
- Policies should include information about the following:
  - The use of assistive devices by people with disabilities to access the organization's goods or services.

- The use of service animals and support persons by people with disabilities on parts of the premises that the organization owns or operates and are open to the public or other third parties, including notice of any fee charged for support persons.
- The steps that will be taken in the event of a temporary disruption to services that people with disabilities use to access the goods or services of the organization.
- A process to receive and respond to feedback on how goods and services are being provided to people with disabilities. This should include information about how the feedback process will be made available to the public, how feedback may be provided (e.g., in person, by telephone, in writing or by email) and the actions that the organization will take if a complaint is received.
- A training policy, including a summary of the contents of the training and details of when training will be provided.

### Training

- Provide training for every person who deals with the public or other third parties on behalf of the organization, as well as for every person who participates in developing the policies, practices and procedures on providing goods or services to members of the public or third parties.
- Provide training to new employees as soon as practicable after the employee is assigned the applicable duties.
- Provide training on an ongoing basis in connection with any changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities.
- Training should include the following:
  - A review of the purposes of the AODA and the requirements of the Customer Service Standards.
  - How to interact and communicate with people with various types of disabilities.
  - How to interact with people with disabilities who use assistive devices, service animals or support persons.
  - How to use equipment or devices available on the premises or provided by the organization that may help with the provision of goods or services to people with disabilities.
  - What to do if a person with a disability is having difficulties accessing the goods or services provided by the organization.
  - A review of the policies, practices and procedures related to providing goods or services to people with disabilities.
- An organization that has more than 20 employees in Ontario must keep records of the dates on which the training is provided and the number of individuals to whom it has been provided.

### Posting of Notices

- Post the following notices in a conspicuous place on the premises, on the organization's website or by another reasonable method:
  - Notice of any temporary disruption in facilities or services that people with disabilities usually use to access goods or services of your organization. The notice should include the reason for the disruption, the duration of the disruption and any alternatives available.
  - Notice that the documents required under the Customer Service Standards are available upon request. If required, the documents should be provided to the person in a format that takes into account the person's disability.

## KEY REQUIREMENTS OF THE INTEGRATED STANDARDS

### Emergency Information and Procedures

- Provide individualized workplace emergency response information to employees who have a disability if the disability is such that individualized information is necessary and your organization is aware of the need for accommodation.
- If emergency procedure plans or public safety information is prepared and made available to the public, the information should be provided in an accessible format or with appropriate communication support as soon as practicable upon request.

### Self-Serve Kiosks

- Organizations with 50 or more employees in Ontario shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks. A “kiosk” means an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both. Effective January 1, 2015, this requirement will apply to organizations with at least one employee in Ontario.

### Accessibility Policies

- Organizations with 50 or more employees in Ontario must develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the Integrated Standards. Effective January 1, 2015, this requirement will apply to organizations with at least one employee in Ontario.
- Organizations with 50 or more employees in Ontario shall do the following:
  - Include in their policies a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner;
  - Prepare one or more written documents describing their policies; and
  - Make the written documents publicly available, and provide them in an accessible format upon request.

### Multi-Year Accessibility Plan

- Organizations with 50 or more employees in Ontario are required to do the following:
  - 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;
  - Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and
  - Review and update the accessibility plan at least once every five years.

### Website Requirements

- Organizations with 50 or more employees in Ontario shall ensure that new Internet websites and web content on those sites conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A, except where meeting the requirement is not practicable.
- The requirement for new Internet websites and web content applies to the following:
  - Websites and web content, including web-based applications, that the organization controls directly or through a contractual relationship that allows for modification of the product;
  - Web content published on a website after January 1, 2012;
  - Websites that are accessible to the public; and

- Websites with a new domain name or websites with an existing domain name undergoing a significant refresh on or after January 1, 2014.
- In determining whether meeting the requirement is not practicable, organizations may consider, among other things, (a) the availability of commercial software and/or tools; and (b) whether the requirement would have a significant impact on the implementation of a project that was planned or initiated before January 1, 2012.

### Training

- Effective January 1, 2015, organizations with 50 or more employees in Ontario shall ensure that training is provided on the requirements set out in the Integrated Standards and on the Ontario *Human Rights Code* as it pertains to persons with disabilities.
  - Training must be provided to all employees, volunteers, persons who participate in developing the organization's policies and all other persons who provide goods, services or facilities on behalf of the organization.
  - Training shall be appropriate to the duties of the employees, volunteers and other persons, and must be provided as soon as practicable.
  - Training shall be provided in respect of any changes to policies made pursuant to the Integrated Standards on an ongoing basis.
  - A record of the training shall be kept, including the date on which the training is provided and the number of individuals to whom it is provided.

### Feedback Process

- Effective January 1, 2015, organizations with 50 or more employees that have processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.
- The organization shall also notify the public about the availability of accessible formats and communication supports.