

Accessibility for Ontarians with Disabilities Act, 2005

Multi-Year Accessibility Plan

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Statement of Commitment:

Durward Jones Barkwell and Company LLP (DJB) is committed to treating all people in a way that allows them to maintain their dignity and independence. DJB is committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its regulations.

This plan will:

- List the area of focus under the Integrated Accessibility Standards (https://www.ontario.ca/laws/regulation/110191) and describe the action item by which Durward Jones Barkwell & Company LLP (DJB) will remove and prevents barriers to people with disabilities;
- Identify the current status of each action item to show to progress that DJB has made in planning, adapting and removing barriers that were identified in the past multi-year review planning;
- Describe the measures DJB plans to take in the coming years to remove and prevent barriers to service and opportunity for people with disabilities; and
- Be made accessible to the public by including on the DJB website.

Initiative	Description	Action	Status
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. 3. (2) Obligated organizations, other than small organizations, shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies. O. Reg. 191/11, s. 3 (2). 3. (3) Every obligated organization, other than a small organization, shall, (a) prepare one or more documents describing the policies it developed under subsection (1); and (b) make the documents publicly available and, on request, provide them in an accessible format. O. Reg. 165/16, s. 3 (1). 	Developed the Accessibility for Ontarians with Disabilities Act – Plan and Policies	Complete
Accessibility Plans	 4. (1) The Government of Ontario, Legislative Assembly, designated public sector organizations and 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; (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and (c) review and update the accessibility plan at least once every five years. 80.44 In addition to the accessibility plan requirements set out in section 4, obligated organizations, other than small organizations, shall ensure that their multi-year accessibility plans include the following: 1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part. 2. Procedures for dealing with temporary disruptions when accessible elements required under this Part are not in working order. O. Reg. 413/12, s. 6. 	 Developed a multi-year plan Posted to DJB's website Created/implemented a review cycle for once every five years 	Complete
Self-Service 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. O. Reg. 191/11, s. 6 (2).	 Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policies 	Ongoing
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.	 All staff, volunteers and persons who participate in developing the organization's policies are trained as appropriate Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy the Accessibility for Ontarians with Disabilities 	Complete

Initiative	Description	Action	Status
Initiative	7. (2) The training on the requirements of the accessibility standards and on the Human Rights Code referred to in subsection (1) shall be appropriate to the duties of the employees, volunteers and other persons. O. Reg. 191/11, s. 7 (2). 7. (3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 191/11, s. 7 (3). 7. (4) Every obligated organization shall provide training in respect of any changes to the policies described in section 3 on an ongoing basis. O. Reg. 191/11, s. 7 (4). 7. (5) The Government of Ontario, the Legislative Assembly, every designated public sector organization and 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. O. Reg. 191/11, s. 7 (5). 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: 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. O. Reg. 165/16, s. 16. 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: 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	Act Policy is posted on DJB's website to share the training policy with the public	Status
	2. How to interact with persons with disabilities who use an assistive device or		
	80.49 (3) Every person referred to in subsection (1) shall be trained as soon as practicable. O. Reg. 165/16, s. 16.		
	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. O. Reg. 165/16, s. 16.		

Initiative	Description	Action	Status
	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. O. Reg. 165/16, s. 16.		
	80.49 (6) Every provider, other than a small organization, shall, (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 (b) on request, give a copy of the document to any person. O. Reg. 165/16, s. 16.		
	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. O. Reg. 165/16, s. 16.		
	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. O. Reg. 165/16, s. 16.		
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.	 All staff have been informed of DJB's accessibility feedback process Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities 	Complete
	11. (2) The organization shall notify the public about the availability of accessible formats and communications supports with respect to the feedback process. O. Reg. 165/16, s. 7.	 Act Policy Notification to the public about DJB's feedback process can be found on the website 	
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. 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. 	 Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy Notification to the public about the availability of accessible formats and communication supports is found on the website 	Complete

Initiative	Description	Action	Status
Emergency Procedures, Plans or Public Safety Information	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.	Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy	Complete
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. 14. (4) Designated public sector organizations and large organizations for their internet websites shall meet the requirements of this section. 14. (5) Except where meeting the requirement is not practicable, this section applies, (a) to websites and web content, including web-based applications, that an organization controls directly or through a contractual relationship that allows for modification of the product; and (b) to web content published on a website after January 1, 2012. O. Reg. 191/11, s. 14 (5). 	 Website content complies with the WCAG 2.0 requirements Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete
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.	 DJB indicates in the job ad on internal and external jobs posted that accommodations are available during the recruitment process, upon request Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete
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.	 In the interview confirmation/invitation email, applicants will be informed that interview accommodations are available upon request Appropriate accommodations are provided to interview candidates upon request Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete

Initiative	Description	Action	Status
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.	 All successful applicants are required to review and acknowledge all policies including accessibility related policies along with their Employment Letter Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete
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. 25. (2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. 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. 	 All new hires are required to review and acknowledge all policies including accessibility related policies along with their Employment Letter All current employees have reviewed and acknowledged the applicable policies Any changes to policies will be communicated to all staff 	Complete
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. 26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. 	Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy	Complete
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. 27. (2) If an employee who receives individualized workplace emergency response information requires assistance and 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. 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. O. Reg. 191/11, s. 27 (3). 	 New hires will have the opportunity to identify any emergency accommodation needs in Criterion Existing employees will be able to request accommodations through HR/PIC Any accommodations will be recorded on an Individual Accommodation Plan Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete

Initiative	Description	Action	Status
Documented Individual Accommodation Plans	 27. (4) Every employer shall review the individualized workplace emergency response information: (a) when the employee's overall accommodation needs or plans are reviewed; and (b) when the employer's overall accommodation needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies. 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. 28. (2) The process for the development of documented individual accommodation plans shall include the following elements: (a) The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. (b) The means by which the employer is assessed on an individual basis. (c) The manner in which the employer can request an evaluation by an outside medical or other expert, at the employee is expense, to determine if and how accommodation can be achieved. (d) 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, 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. (e) The steps taken to protect the privacy of the employee's personal. (f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. (g) If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. (h) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disabi	 New hires will have the opportunity to identify any emergency accommodation needs in Criterion Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete

Initiative	Description	Action	Status
Return to Work Process	 29. (1) Every employer, other than an employer that is a small organization; (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 (b) shall document the process 29. (2) The return to work process shall; (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 (b) use individual documented accommodation plans as described in section 28, as part of the process. 29. (3) The return to work process referenced in the section does not replace or override any other return to work process created by or under any other statute. 	 Developed a process to address return to work plans for employees who have been absent from work due to a disability Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete
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.	 Developed process to take into account the accessibility needs of employees with disabilities in the performance management process Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete
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.	 Developed process to take into account the accessibility needs of employees with disabilities in the career development and advancement process Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete
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.	 Developed process to take into account the accessibility needs when redeploying employees with disabilities Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Complete

Initiative	Description	Action	Status
Service Counters, Fixed Queuing Guides, and Waiting Areas	80.41 (1) When constructing new service counters, which includes replacing existing service counters, the following requirements must be met: 1. There must be at a minimum one service counter that accommodates a mobility aid for each type of service provided and the accessible service counter must be clearly identified with signage, where there are multiple queuing lines and service counters. 2. Each service counter must accommodate a mobility aid, where a single queuing line serves a single or multiple counters. O. Reg. 413/12, s. 6. (2) The service counter that accommodates mobility aids must meet the following requirements: 1. The countertop height must be such that it is usable by a person seated in a mobility aid. 2. There must be sufficient knee clearance for a person seated in a mobility aid, where a forward approach to the counter is required. 3. The floor space in front of the counter must be sufficiently clear so as to accommodate a mobility aid. O. Reg. 413/12, s. 6. Fixed queuing guides 80.42 When constructing new fixed queuing guides, the following requirements must be met: 1. The fixed queuing guides must provide sufficient width to allow for the passage of mobility aids and mobility assistive devices. 2. The fixed queuing guides must have sufficiently clear floor area to permit mobility aids to turn where queuing lines change direction. 3. The fixed queuing guides must be cane detectable. O. Reg. 413/12, s. 6. Waiting areas 80.43 (1) When constructing a new waiting area or redeveloping an existing waiting area, where the seating is fixed to the floor, a minimum of three per cent of the new seating must be accessible, but in no case shall there be fewer than one accessible seating space. O. Reg. 413/12, s. 6. (2) For the purposes of this section, accessible seating is a space in the seating area where an individual using a mobility aid can wait. O. Reg. 413/12, s. 6.	Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy	Ongoing

Initiative	Description	Action	Status
Customer Service Standard	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. O. Reg. 165/16, s. 16. (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. 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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16.	Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy	Complete
Use of Service Animals and Support Persons	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. O. Reg. 165/16, s. 16. (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	 Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy The above policy is posted on the website to identify the steps DJB takes to support service animals and support persons 	Complete

Initiative	Description	Action	Status
	with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises. O. Reg. 165/16, s. 16.		
	(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. O. Reg. 165/16, s. 16.		
	(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. O. Reg. 165/16, s. 16.		
	(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,		
	 (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 (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. 		
	(6) If an amount is payable for a person's admission to the premises or in connection with a person's presence on the premises, the provider shall ensure that notice is given in advance about the amount, if any, payable in respect of the support person. O. Reg. 165/16, s. 16.		
	(7) If, under subsection (5), the provider requires a person with a disability to be accompanied by a support person when on the premises, the provider shall waive payment of the amount, if any, payable in respect of the support person's admission to the premises or in connection with the support person's presence on the premises. O. Reg. 165/16, s. 16.		
	(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. O. Reg. 165/16, s. 16.		
	(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. O. Reg. 165/16, s. 16.		

Initiative	Description	Action	Status
	(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. O. Reg. 165/16, s. 16. 80.48 (1) If, in order to obtain, use or benefit from a provider's goods, services or		
Notice of Temporary Disruptions	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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16. (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. O. Reg. 165/16, s. 16.	 Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy The above policy is posted on the website to identify the steps DJB will take in connection with a temporary disruption 	Complete
Accessibility Reports	86.1 (3) Subject to subsections 33 (3) and (5) of the Act, organizations shall file the accessibility report required under subsection 14 (1) of the Act with a director every three years following the report that was due on December 31, 2014.	 DJB will file accessibility reports within the defined timelines Obligations and procedures are referenced in the Accessibility for Ontarians with Disabilities Act Policy 	Ongoing