

Ken Knapp Ford Sales

Multi-Year Accessibility Plan

2024

**In Compliance with O. Reg. 191/11
Including Information and
Communication and Employment
Accessibility Standards**

January 1, 2024

Integrated Accessibility Standard Regulation: General Regulations

Regulation Requirement

O. Reg. 191/11- 27 (1-4)

Individualized workplace emergency response information must be provided upon request and in accessible formats when need is articulated. Individualized workplace emergency response information **shall** be reviewed when: employee moves to different location in organization, employee's overall accommodation needs or plans are reviewed and when employer reviews general emergency response policies.

Action Plan

1. Emergency Response Plan Template
 - 1.1. Create Emergency Response Planning Template and distribute to existing and new staff (as applicable)
2. Communication Plan:
 - 2.1. Inform staff of Emergency Response assistance

Responsibility

Controller

Required Resources

- 1.1 Emergency Response Plan Template
- 2.1 Notice of Emergency Response assistance provided to staff via memo and staff meeting

Status

Completed

Integrated Accessibility Standard Regulation: General Requirements

Regulation Requirement

O. Reg. 191/11- 3 (1-4)

Accessibility Policy

Develop Accessibility Policy to address compliance with Integrated Accessibility Standard Regulation. Policy can be one or more documents. Sections have varying compliance Due Dates.

Action Plan

1. Policy:
 1. Develop Policy
 2. Communicate policy to staff
 3. Post notice of policy in dealership and on website

Responsibility

Controller

Required Resources

1. Accessibility Policy
2. Circulate policy to staff
3. Dealership and Website posting

Status

Completed

Integrated Accessibility Standard Regulation: General Requirements

Regulation Requirement

O. Reg. 191/11- 4 (1-4)

Accessibility Plan

To outline compliance plan in regards to Integrated Accessibility Standard Regulation. Must be posted on website upon completion. Annual Progress Report required. Complete Plan update required every 5 years.

Action Plan

1. Plan Development:
 - 1.1. Develop Multi-Year Accessibility Plan
 - 1.2. Develop Progress Report Template

Responsibility

Controller

Required Resources

1. Multi-Year Accessibility Plan
2. Progress Report Template

Status

Completed

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 14 (1-7)

Websites*

New websites and web content **shall** conform to W3C WCAG 2.0 Level A. Except where not practicable, this applies to:

- Websites
- Web content (published after January 1, 2012)
- Web-based applications that an organization controls directly or through a contractual relationship that allows for modification of a product.

Action Plan

1. Website and Application Review:

- 1.1. Assess website using automatic quality tool (e.g. www.achecker.ca)

Responsibility

Website Manager

Required Resources

1. Website accessibility checking program

Status

Pending

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 22

Accommodation – Recruitment

Notice **shall** be provided to employees and public about the availability of accommodation for applicants with disabilities during recruitment process.

O. Reg. 191/11 – 23(1-2)

Accommodation – Selection

Accommodation **shall** be provided to applicants selected to participate in assessment or selection process, upon request. Suitable accommodation **shall** be provided in manner that takes applicant's accessibility needs.

Action Plan

1. Policy:
 - 1.1. Create/Update Employment Policy and Procedures section in Accessibility Policy.
 - 1.2. Establish procedure for recruitment accommodations including notice in advertisements and notifying candidates selected for interviews and testing of availability of accommodation.
 - 1.3. Provide procedural training regarding providing applicant accommodation for staff responsible for recruiting, selecting and hiring staff as well as staff who would participate in the recruitment process.

Responsibility

Department Manager

Required Resources

1. Employment Policy section in Accessibility Policy
2. Notice of accommodation in job ads/postings
3. Training via Ontario Human Rights Commission website - <http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>
4. Training via Access Forward website – www.accessforward.ca

Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 - 24

Accommodation Notice - New Employees

Successful applicant **shall** be informed of availability of accommodation and **shall** be provided with accommodation policy when making offer of employment.

Action Plan

1. Policy:
 1. Add Notice of Accommodation to standardized Employment Letter for all Offers of Employment
 2. Ensure Employment Offer letters include Ken Knapp Ford Sales Sales': Accessibility Policy, Accommodation Policy and Accommodation Planning Procedures and Emergency Response and Evacuation Support Procedures.

Responsibility

Controller

Required Resources

1. Template for Offer of Employment letter to include accessibility provision

Status

Completed

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Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 25 (1-3)

Accommodation Notice - All Employees

Accommodation policy provided to all employees and updates provided whenever changes are made

Action Plan

1. Policy/Procedure:
 - 1.1. Provide updates employees as needed
 - 1.2. Procedural training provided to supervisors regarding any policy updates

Responsibility

Controller

Required Resources

1. Communication Plan
2. Training Updates

Status

Completed as needed

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Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 26 (1-2)

Alternate formats provided to employees with disabilities upon request including information needed to perform employee's job, information generally available in workplace. Employer will consult employee making request when determining suitability of accessible format provided.

Action Plan

1. Policy and Procedure:

- 1.1. Establish Process/procedure regarding how to respond to requests for alternate formats from employees.

Responsibility

Controller

Required Resources

- 1.1 Communication Plan
- 1.2 Alternate Format request procedure

Status

Completed as needed

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Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 28 (1-2)

Documented Accommodation Plans provided to employees with disabilities

O. Reg. 191/11 – 29 (1-3)

Documented Return-to-Work process established including disability-related accommodations

Action Plan

1. Accommodation Planning Tool:

1.1. Create Accommodation Planning Form

1.2. Create Individualized Accommodation Plans to be completed with employee and on file as required

2. Return-to-Work Accommodation Planning Tool:

1. Create Return-to-Work Process and Accommodation Planning Form

2. Complete Individualized Accommodation Plans to be and retain on file as required

Responsibility

Controller

Required Resources

1. Accommodation Planning Template

2. Return-to-Work Accommodation Planning Template

3. Procedural training for Human Resources staff

Status

Completed

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Integrated Accessibility Standard Regulation: Employment

Regulation Requirement

O. Reg. 191/11 – 30 (1-2); 31 (1-2); 32 (1-2)

Accessibility Throughout Employment Life-Cycle

Performance Management, Career Development and advancement and Redeployment/
Reassignment processes include accessibility accommodation and provided in alternate format

Action Plan

1. Performance Management:
 - 1.1. Provide Procedural training for Managers and Supervisors
2. Career Development and Advancement:
 - 2.1. Establish procedure of addressing accommodation needs in advance of training participation of employee
3. Redeployment:
 - 3.1. Develop process for accommodation needs for employee transfers and redeployment
 - 3.2. Provide Procedural training for Managers and Supervisors

Responsibility

Department Manager

Required Resources

1. Procedure
2. Communication Plan
3. Procedural Training

Status

Completed

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 7 (1-6)

General IASR Training

Employers **shall** provide training regarding Integrated Accessibility Regulation to all employees and persons who participate in developing organizational policy and other persons who provide goods, services or facilities on behalf of the organization.

O. Reg. 191/11 – 7 (1-6)

Training in Employment Process and OHRC

Employers **shall** provide training regarding Integrated Accessibility Regulation – Employment Standard and Ontario Human Rights Code to all employees (i.e. Accessible recruitment and screening, employment policy and accommodation planning training).

Training to take place as soon as practicable and **shall** include any changes to policies on an ongoing basis. Record keeping of training provided and number of participants is required

Action Plan

1. Training Plan Development:

- 1.1. Train staff in General Requirements, Information and Communication Standard and Employment Standard as appropriate and in relation to their roles and responsibilities – through Access Forward website – www.accessforward.ca
- 1.2. Ensure senior staff participate in online training provided by Ontario Human Rights Commission: <http://www.ohrc.on.ca/en/learning/working-together-ontario-human-rights-code-and-accessibility-ontarians-disabilities-act>

Responsibility

Controller

Required Resources

1. Training Plan

Status- Complete

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 – 11 (1-4)

Feedback Mechanism

Ensure accessible feedback mechanism in relation to areas covered under Integrated Accessibility Regulation. Every obligated organization **shall** notify public about availability of accessible formats and communication supports.

Action Plan

1. Feedback Mechanism Update
 1. Update Feedback mechanism. Ensure web-based feedback mechanism is accessible. Ensure multiple channels of feedback are available.
 2. Mechanism/Policy to be expanded to include procedures for dealing with alternate format requests and employment related feedback

Responsibility

Controller, Website Manager

Required Resources

1. Feedback mechanism update
2. Policy update

Status

Pending

Integrated Accessibility Standard Regulation: Design of Public Spaces

Regulation Requirement

O. Reg. 413/12

Standard applies to public spaces that are newly constructed or redeveloped on and after January 1, 2016. The standard applies to new construction or major renovations being designed for the following facilities or elements:

- Exterior paths of travel
- Off-street parking
- Service counters and Waiting areas (indoor and outdoor)

Action Plan

Ensure newly constructed or redeveloped facilities on and after January 1, 2016 meet Accessibility Standard requirements.

Responsibility

Controller

Required Resources

Analysis of Standard requirements

Status

Analysis completed. Design of Public Spaces criteria to be included in new construction and extensive renovation projects.

Integrated Accessibility Standard Regulation: Information and Communications

Regulation Requirement

O. Reg. 191/11 - 12 (1)

Organizational Material in Alternate Format:

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 and in consultation with the person making the request

Action Plan

1. Alternate Format Provision:

- 1.1. Establish internal procedures for processing requests for alternate formats (i.e. response procedure to customer, customer follow-up)

Responsibility

Controller

Required Resources

Procedures

Status

Completed