

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005

INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan

Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	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 ready for approval. Nov. 30, 2013.	Complete	January 1, 2014
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>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;</p> <p>b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>Multi-Year Accessibility plan is available starting January 1, 2014 at: www.insception.com</p> <p>Plan is occasionally updated to reflect changes. Last update was made December 24, 2014 to reflect IASR reporting compliance.</p>	Complete	January 1, 2014

7	Training	<p>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,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>Starting January 1, 2014, Inception will:</p> <ul style="list-style-type: none"> • Determining the method of training (online/classroom) based on budget for 2014 • Determine training content (all integrated standards, addressing disabilities under the Human Rights Code, information about staff accommodations) • Training shall be appropriate to job duties. Managers will be trained differently (which will involve recruiting, accommodation needs and process, return to work etc.) 	<p>Complete</p> <p>All staff was trained before December 31, 2014</p>	<p>January 1, 2015</p>
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PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	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.	<ul style="list-style-type: none"> • Conduct a review of all feedback processes across the organization (Employee engagement survey, Client Satisfaction survey, etc. Shall be both internal and external.) • Will ensure those are offered in an alternative format, as requested. • Communicate the process internally for those that administer the feedback. 	Complete	January 1, 2015
12	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.	<ul style="list-style-type: none"> • Conduct a review of all Information and Communication across the organization (to clients and internal) • Will ensure those are offered in an alternative format, as requested. • Ensure all departments are aware and develop accessible formats for the information they provide. 	In progress/ Ongoing	January 1, 2016
12		12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<ul style="list-style-type: none"> • Consult Management across the organization on ways to handle these requests. • Understand process: what to do if you can't accommodate, who do they escalate to, what if an agreement can't be reached. 	In progress/ Ongoing	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of	<ul style="list-style-type: none"> • Will be posted on our website, and at all our locations 	In progress/ Ongoing	January 1, 2016

		accessible formats and communication supports.			
13	Emergency Procedures, Plans or Public Safety Info	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.	Not applicable	N/A	January 1, 2012
14	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.	<ul style="list-style-type: none"> • Consultation with IT department and Sales & Marketing regarding website content requirements. 	<p>Complete</p> <p>New website and all content conforms with WCAG 2.0 level AA</p>	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success

					criteria 1.2.5 Audio Descriptions (Pre- recorded).
15	Educational & Training Resources & Materials	<p>15(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <ol style="list-style-type: none"> 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, <ol style="list-style-type: none"> i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format. 2. Provide student records and information 	N/A	N/A	January 1, 2013

		on program requirements, availability and descriptions in an accessible format to persons with disabilities.			
16	Training to Educators	16(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.	N/A	N/A	January 1, 2013
		(2) Obligated organizations that are school boards or educational or training institutions 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.	N/A	N/A	January 1, 2013
17	Producers of Educational or Training Material	17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.	N/A	N/A	January 1, 2015 For accessible or conversion ready versions of textbooks
17		(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or	N/A	N/A	January 1, 2020 For accessible or conversion ready versions of printed materials that are

		conversion ready versions of the printed materials available to the institutions.			educational or training supplementary learning resources.
18	Libraries of educational & training institutions	<p>18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request.</p> <p>(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).</p>	N/A	N/A	<p>January 1, 2015 For print-based resources or materials</p> <p>January 1, 2020 For digital or multimedia resources or materials</p>

PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	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.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
23	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. 23.(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.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
24	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.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016

		not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.			
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
25		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.	See 25 (1)		January 1, 2016
26	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.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
26		26.2. The employer shall consult with the employee making the request in	• We will consult with the person with Disability before determining the alternate format.	In progress/ Ongoing	January 1, 2016

		determining the suitability of an accessible format or communication support.	•In progress, will meet deadline		
27	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.	Harneet Maggu, HR Associate is the contact, as listed in our Customer Service Policy under AODA policies, all staff are aware.	Complete	January 1, 2012
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with 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.	Practice in place with regards to workplace emergency response information for anyone requiring assistance.		January 1, 2012
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.	Practice in place with regards to workplace emergency response information for anyone requiring assistance.		January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a	Practice in place with regards to workplace emergency response information for anyone requiring assistance.		January 1, 2012

		<p>different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.</p>			
28	Documented Individual Accommodation Plans	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.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 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 	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016

		<p>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.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</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>			
29	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</p>	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016

		<p>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>			
29		<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>	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
29		<p>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.</p>	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
30	Performance Management	<p>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.</p>	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016
			Under review, will meet compliance	In progress/	



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CANADA'S #1 CORD BLOOD PROGRAM

31	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.	deadline.	Ongoing	January 1, 2016
32	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.	Under review, will meet compliance deadline.	In progress/ Ongoing	January 1, 2016