

Company Plan– Defense Solutions Ottawa

Accessibility for Ontarians with Disabilities Act (AODA) Integrated Accessibility Standards Multi-Year Plan

Accessibility at Curtiss-Wright

The AODA seeks to provide a fully accessible Ontario by 2025. To meet this objective, organizations, including Curtiss-Wright, must work to ensure their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

The Integrated Accessibility Requirements Standard (IASR) requires all employers with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website. To meet the requirements of IASR the plan must outline a comprehensive strategy to prevent and remove barriers to accessibility.

The objective of the multi-year plan is to support Curtiss-Wright’s compliance with AODA and the IASR.

AODA Multi-year plan for the Integrated Accessibility Standards				
Compliance Date	Initiative	ISAR Requirements	Action	Status
January 1, 2014	Establishment of Accessibility Polices	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.	Create policy Post on website Post on intranet Add to new hire training Train existing employees	Completed
January 1, 2014	Accessibility Plans	4.(1) 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	Draft Multi-year plan Post to website Create/ implement a review cycle	Completed

		provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years.		
January 1, 2014	Accessible Website and Web Content Part II – s. 14	14.(2) Designated public sector 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, (by January 2021) and shall do so in accordance with the schedule set out in this section.	Assess current web functionality to ensure compliance and adequate accessibility features Ensure technology and content owners (IT and marketing) are aware of IASR requirements for existing web content Include WCAG 2.0 guidelines into CW design standards Determine web initiatives with 2014+ launch to ensure they conform with WCAG 2.0 level A guidelines (Jan 2014)	Completed
January 1, 2015	Training Part 1 – s.7	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.	Develop training plan to cover AODA and the Human Rights Code as it pertains to people with disabilities. Consider the requirement that training be customized to different employee groups Determine if training will be standalone or integrated into existing accessibility training (Customer Service Standard) Determine how training will be delivered (via LMS or live) Training will be mandatory for existing employees Training will be part of new hire orientation	Completed

			<p>Training will be available in an accessible format</p> <p>Determine mechanism for managing and tracking completion of training by CW Ottawa employees</p>	
January 1, 2015	Feedback Part II – s.11	<p>11.(1) Every obligated organization that has processes for receiving feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request</p>	<p>Make all groups who provide surveys (marketing, HR, PE/ customer service) aware of the IASR requirements</p> <p>Determine process for requesting accessible forms (i.e. website, via email to dedicated address, in person, via phone, in writing)</p> <p>Determine all current feedback surveys and mechanisms</p> <p>Develop understanding of current accessible formats and information and communication and technology tools available at CW to adequately respond to requests for accessible formats</p>	Completed
January 1, 2016	Accessible Formats & Communications Supports Part II – s.12	<p>12. (1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communications supports for persons with disabilities,</p> <p>a) in a timely manner that takes into account the person’s accessibility needs due to the disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p> <p>12. (2) The obligated</p>	<p>Review accessible formats and communications, technology supports currently available</p> <p>Review process for requesting accessible formats and communications supports</p> <p>As needed, update current process for requesting accessible formats</p> <p>Develop communication strategy for education employees on the</p>	Completed

		<p>organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>12. (3) Every obligated organization shall notify the public about the availability of accessible formats and communications support</p>	<p>availability of and process for requesting accessible formats and communication supports</p> <p>Develop a process to respond to, approve or decline a request</p> <p>Incorporate language in marketing material and website to advise, that in accordance with AODA, accessible format may be made available upon request.</p>	
January 1, 2016	Recruitment General Part III – s.22	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process	<p>Review all mechanisms for posting jobs (website, job boards, social media, universities)</p> <p>Incorporate language on postings and career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available upon request.</p>	Completed
January 1, 2016	Recruitment Assessment or Selection Process Part III – s.23	<p>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 material or processes to be used.</p> <p>(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.</p>	<p>Incorporate language in all notifications to applicants for interview (email, letter, phone) that accommodations are available upon request.</p> <p>Ensure Talent Acquisition team is trained to have accessibility conversations to solicit and handle accommodation requests</p> <p>Determine process to implement requests for accommodation in accordance with AODA</p> <p>Review recruitment process (tests, assessments, rooms, etc) to ensure barriers can be removed or accessibility</p>	Completed

			features provided, upon request	
January 1, 2016	Notice to successful applicants Part III –s.24	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Incorporate in Offer letter a section regarding CW's accessibility policies and when additional information on CW internal and external sites can be found Provide guidance to Talent Acquisition who will respond to requests	Completed
January 1, 2016	Informing Employees of Supports Part III –s.25	25.(1) Every employer shall inform its employees of its policies used to support 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 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.	Develop change and communication strategy to educate and advise CW employees on accessibility policies, plans, and processes Accessibility policies and processes to be incorporated in Onboarding program Develop process and strategy to communicate any policy changes by email, Site specific SharePoint Sites, posting on HR SharePoint Sites	completed
January 1, 2016	Accessible Formats and Communications Supports for Employees Part III –s.26	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 communications supports for, a) information that is needed	Educate employees and Managers on the availability of accessible format and communications supports in accordance with AODA. Develop, implement and educate employees and Managers on the process	

		<p>in order to perform the employee's job; and b) information that is generally available to the employees in the workplace.</p> <p>26. (2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>for requesting accessible formats and communications supports</p> <p>Develop a process for consulting with employees to determine accommodation needs</p> <p>Develop a process of advising employees of solution</p>	
January 1, 2016	Documented Individual Accommodation Plans Part III –s.28	<p>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.</p> <p>28. (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ul style="list-style-type: none"> 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 employee 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 employer's expense, to determine if an how accommodation can be achieved. d) The manner in which the employee can request the participation of their bargaining agent, 	<p>Review current accommodation processes and practices</p> <p>Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA</p> <p>Create a standard operating plan for the development of documented plans that will incorporate:</p> <ul style="list-style-type: none"> - Manner in which employee can request - Under which circumstances a medical is required - Accommodation plans to incorporate confidentiality requirements and outline when, and to whom (Manager, Manulife) and what information can be shared <p>Educate employees on accessibility policies and processes and procedures for requesting plans</p> <p>Develop change and communication plan to support awareness of process for, and availability</p>	completed

		<p>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> <ul style="list-style-type: none"> e) The steps taken to protect the privacy of the employee's personal information. 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 disability. 	of, individual accommodation plans, in support of AODA.	
January 1, 2016	Return to work Process Part III –s.29	<p>29.(1) Every employer other than an employer who is a small organization,</p> <ul style="list-style-type: none"> 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. <p>29.(2) the return to work</p>	<p>Liaise with Manulife to conduct a review of the current return to work process.</p> <p>Update and document return to work processes based on gaps and compliance requirements.</p>	Completed

		<p>process shall,</p> <ul style="list-style-type: none"> a) Outline the steps the employer will take to facilitate the return to work of employees who were absent because of their disability required them to be away from work; and b) Use documented individual accommodation plans as part of the process. <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>		
January 1, 2016	Performance Management Part III –s.30	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>Review and assess current performance review processes to ensure accessibility features are incorporated (i.e. Forms accessible, plain text available)</p> <p>Ensure any new introductions to the process incorporate accessibility features</p> <p>Ensure managers receive required training or communication to provide awareness on effective communications strategies, timing to allow employees to review and understand feedback prior to meetings, and reasonable accommodation</p>	Completed
January 1, 2016	Career Development and Advancement Part III –s.31	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	<p>Review of current training and professional development materials to determine accessibility features</p> <p>Ensure all future</p>	Completed

		individual accommodation plans, when providing career development and advancement to its employees with disabilities	<p>developed training and material are developed with accessibility features in mind</p> <p>Ensure promotion criteria and practices take into account individual accommodation needs and plans, in accordance with AODA</p> <p>Track career progression of individuals with disabilities</p>	
January 1, 2016	Redeployment Part III –s.32	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.	<p>Review and update (as necessary) current transfer and redeployment practices and processes to ensure accommodation plans are referenced</p> <p>Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs</p>	Completed