



Cancer Care Ontario Multi-Year AODA Accessibility Plan - Updated: December 7, 2018

Cancer Care Ontario (CCO) is an organization committed to ensuring accessible services and communications to individuals with disabilities.

To receive any part of this document in an alternate format, please contact Cancer Care Ontario's Communications Department at:

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Background

Cancer Care Ontario (CCO) is a designated public sector organization that is subject to the provisions of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*. The *AODA* came into force in 2005. Its purpose is to ensure greater accessibility for Ontarians with disabilities. Since becoming law, CCO has been required to comply with its provisions, which are being phased in between 2010 and 2025.

This Multi-Year Accessibility Plan (Accessibility Plan) outlines CCO's compliance with the *AODA*, sets out CCO's upcoming obligations pursuant to the *AODA*, identifies how CCO will meet those obligations, and provides a status report on the progress of measures taken by CCO. CCO is committed to fulfilling its obligations under the *AODA* and making its premises and services accessible to all Ontarians.

This Accessibility Plan covers the following areas:

1. Overview of the *AODA* and its Accessibility Standards;
2. CCO's Accessibility Committee; and
3. Reporting on Compliance.

Statement of Commitment to Accessibility

At CCO, we are committed to doing all we can to respect the core principles of accessibility legislation: dignity, independence, integration and equal opportunity. We will incorporate these principles into our policies, procedures, training and best practices. Our aim is that all Ontarians can access our services and information when and how they need them, regardless of their abilities or disabilities.

Ensuring our operations are accessible and barrier-free is a shared effort. As an organization, we are dedicated to working with the people of Ontario to make accessibility for everyone a reality.

OVERVIEW OF THE AODA AND ITS ACCESSIBILITY STANDARDS

The AODA came into force in 2005. It permits the government to establish Accessibility Standards in order to remove or prevent barriers for Ontarians with disabilities¹ by 2025. CCO is required to comply with the AODA by creating documents, policies, practices, and procedures as prescribed by the Accessibility Standards to accommodate persons with disabilities. Accessibility Standards currently exist in the following areas:

Accessibility Standards for Customer Service

Purpose:

- To ensure all services offered to the public are provided in an accessible manner.

Application:

- CCO must ensure that all services it provides to the public, including screening services (e.g., ColonCancerCheck), clinical programs (e.g., PET Program), and public facing events, such as CCO's Annual General Meeting and CCO's public-facing website, are accessible.

Status:

- Came into force on January 1, 2008 through O. Reg 429/07. As a designated public sector organization, CCO was required to comply with the Customer Service Standards as of January 1, 2010.²
- As of January 1, 2010, CCO achieved full compliance with the Customer Service Standards not relating to CCO's public-facing websites.
- As of March 1, 2018, CCO achieved full compliance with WCAG 2.0 Customer Service Standards requirements for CCO's corporate and cancer websites, it is working towards compliance for its tertiary websites.
- As of August 8, 2018, CCO achieved full compliance with WCAG 2.0 Customer Service Standards requirements for CCO's for its renal and tertiary websites.
- A compliance timeline and summary is set out in **Appendix "A"**.

Integrated Accessibility Standards: Information and Communications Standards, Employment Standards, Transportation Standards and Design of Public Spaces Standards

Purpose:

- To ensure accessibility in the areas of information and communications, employment, transportation and the design of public spaces.

Application:

- CCO will be required to make its information and communications and its HR practices accessible to people with disabilities, and will need to develop a number of policies, plans and procedures to outline its compliance with the Integrated Accessibility Standards.

¹ The AODA uses the same definition of disability as the *Ontario Human Rights Code*, which includes disabilities of differing severity, both visible and non-visible, as well as permanent and transient disabilities. See *Guide to the Accessibility Standards for Customer Service*, Ontario Regulation 429/07, Accessibility Directorate of Ontario, January 2008.

² See Section 2 of the *Customer Service Regulation*.

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- As CCO does not provide transportation services, the Transportation Standard does not apply to CCO.
 - CCO will be required to ensure that any CCO public spaces that are newly constructed or redeveloped on and after January 1, 2016 meet the requirements set out in the Design of Public Spaces Standards.

Status:

- Came into force on July 1, 2011 through O. Reg 191/11.
- CCO was required to comply with various requirements under the Integrated Accessibility Standards, which were phased in between January 1, 2012 – January 1, 2015. CCO achieved compliance with such requirements under the Integrated Accessibility Standards, in accordance with the required timelines.
- As of January 1, 2021, CCO will be required to comply with the next phase of requirements under the Integrated Accessibility Standards regarding accessible websites and web content.
- A compliance timeline and summary is set out in Appendix “B” and Appendix “C”.

CCO'S ACCESSIBILITY COMMITTEE

In 2009, CCO formally constituted an Accessibility Committee, with designated representatives from across the organization. The purpose of the Accessibility Committee is to review the *AODA* and to plan, develop and implement processes and procedures to ensure that CCO is meeting its legal requirements under the *AODA* and its regulations. The Accessibility Committee meets on an ad hoc basis as required to review CCO's progress in achieving compliance with the *AODA*, with meetings chaired by CCO's Legal Department. CCO's Legal Department is responsible for presenting updates from the Accessibility Committee to CCO's Enterprise Services Committee, CCO's Executive Team (ET), the Corporate Governance and Nominating Committee (CGNC), CCO's Board of Directors and CCO Staff, as needed.

REPORTING

The following chart sets out CCO's reporting requirements under the *AODA* and Accessibility Standards:

Legislation	Requirement	Deadline	Responsibility	Status
Accessibility Report (s.14, <i>AODA</i>; s. 86.1, <i>Integrated Accessibility Standards Regulation</i>)	First Accessibility Report required to be filed with the Ministry of Community and Social Services	March 31, 2010	Legal	COMPLETED
Accessibility Report (s.14, <i>AODA</i>; s. 86.1, <i>Integrated Accessibility Standards Regulation</i>)	Second Accessibility Report required to be filed with the Ministry of Economic Development, Trade and Employment ("MEDTE")	December 31, 2013	Legal	COMPLETED
Accessibility Report (s.14, <i>AODA</i>; s. 86.1, <i>Integrated Accessibility Standards Regulation</i>)	Subsequent Accessibility Reports required to be filed <u>every two years</u> thereafter	December 31, 2015 (and every two years thereafter)	Legal	COMPLETED/ ONGOING Next completion date – December 31, 2019
Accessibility Plans (s. 4, <i>Integrated Accessibility Standards Regulation</i>)	Establish, implement, maintain and document a multi-year accessibility plan (to be reviewed and updated at least once every five years)	January 31, 2013	Legal	COMPLETED/ ONGOING Accessibility Plan drafted and reviewed by CCO's Accessibility Committee and by persons with disabilities who self-selected to assist CCO in the completion of the plan. Next expected completion date – December 31, 2023
Accessibility Plans (s. 4, <i>Integrated Accessibility Standards Regulation</i>)	Establish, review and update accessibility plan in consultation with persons with disabilities and CCO's	January 31, 2013	Legal and People and Culture	COMPLETED / ONGOING

Legislation	Requirement	Deadline	Responsibility	Status
	Accessibility Committee.			
Accessibility Plans (s. 4, <i>Integrated Accessibility Standards Regulation</i>)	Post accessibility plan on CCO's website and provide the plan in an accessible format upon request.	January 31, 2013	Web and Digital Services	COMPLETED / ONGOING Updated plan posted December 2018.
Annual Status Reports (s.4(3), <i>Integrated Accessibility Standards Regulation</i>)	Prepare an annual status report on the progress of measures taken to implement the accessibility plan.	January 1, 2014 and annually.	Legal	COMPLETED/ ONGOING
Annual Status Reports (s.4(3), <i>Integrated Accessibility Standards Regulation</i>)	Post the status report on CCO's website and provide the report in an accessible format upon request.	January 1, 2014 and annually.	Web and Digital Services	COMPLETED/ ONGOING

Appendix “A”

Customer Service Standards: Timeline to Completion Chart

Requirement	CCO Activity	Deadline	Responsibility	Status	Compliance
Draft Required Documentation	Develop CCO Customer Service policy / procedures for the compliance with the Customer Service Standards.	Jan 1, 2010	Legal	COMPLETED. As of January 2015, CCO’s <i>Customer Service Policy and Procedures</i> has been incorporated into CCO’s combined <i>AODA Policy and Procedures.</i>	Yes
Make CCO’s external website accessible (www.ccohealth.ca)	Make all public information on CCO’s external website accessible to persons with disabilities.	Jan 1, 2010	Web and Digital Services	COMPLETED, continuing on an as need basis	Yes
Make any other CCO designated, maintained and hosted public facing website accessible	Make all public information on any other CCO designated, maintained and hosted public facing website accessible to persons with disabilities.	Jan 1, 2010	Web and Digital Services	INCOMPLETE	No
Make CCO’s Annual General Meeting (“AGM”) accessible	Make all AGMs accessible by ensuring that all CCO correspondence and invitations to the AGM include a provision stating that alternate accommodation is available upon request and all AGM-related documents are available in alternate formats upon request.	Jan 1, 2010	Communications	COMPLETED, continuing on an as needed basis – Communications (External Events Coordinator) ensures that selected venue is accessible, that all invitations include statement regarding accessibility, and that any identified accessibility needs are addressed.	Yes
Make CCO’s public events accessible	Make all CCO events designated by Communications as being “for the public” accessible by ensuring that all CCO correspondence and invitations to public events include a provision stating that alternate accommodation is available upon request and all event-related documents are available in alternate formats upon request.	Jan 1, 2010	Communications	COMPLETED, continuing on an as needed basis - Communications (External Events Coordinator) ensures that selected venues are accessible, that all invitations include statement regarding accessibility, and that any identified accessibility needs are addressed.	Yes
Make CCO’s public-facing portion of the Colon-Cancer	Make all CCO correspondence to the public for the Colon-Cancer-Check program accessible by including a	Jan 1, 2010	Prevention & Cancer Control	COMPLETED, continuing on an as needed basis	Yes

Requirement	CCO Activity	Deadline	Responsibility	Status	Compliance
Check accessible	provision that alternate formats of the correspondence are available upon request.				
Make CCO's public-facing portion of the OBSP and OCSP accessible	Accessibility of the OBSP affiliate websites are the responsibility of the affiliate. Make all OBSP and OCSP correspondence to the public that is CCO's responsibility accessible by including a provision that alternate formats of such correspondence are available upon request.	Jan 1, 2010	Prevention & Cancer Control	COMPLETED, continuing on an as needed basis	Yes
Make CCO's public-facing portion of Aboriginal Programs accessible	Make all CCO Aboriginal Programs accessible by including an accessibility icon on the applicable CCO-maintained websites and by including a provision in all CCO correspondence to the public dealing with these programs that alternate formats of such correspondence are available upon request.	Jan 1, 2010	Aboriginal Cancer Control, Web and Digital Services	COMPLETED, continuing on an as needed basis	Yes
Include the concept of accessibility in CCO procurements to the public	When procuring goods/services that will be provided to the public, CCO shall ensure that all procurement documents specify that the winning vendor shall perform its services in accordance with the customer service standards as set out in the <i>AODA</i> and the evaluation process shall provide for the evaluation of proposals in respect of the <i>Customer Service Standards</i> .	Jan 1, 2010	Legal, Procurement	COMPLETED, continuing on an as needed basis – template legal agreements include a provision requiring successful vendor to be knowledgeable of the applicable <i>AODA</i> requirements and to perform its services in accordance with the <i>AODA</i> and the <i>Customer Service Standards</i> .	Yes
Make notice forms re: temporary disruptions	"Notice of temporary disruption form" to be created and posted at CCO's public premises at 620, 525 and 505 University Ave and on CCO's website when access to such premises are temporarily disrupted (such public notice might relate to facility renovations or repairs, including maintenance of elevators or accessible washrooms).	Jan 1, 2010	Facilities and Landlords of CCO premises	COMPLETED, continuing on an as needed basis	Yes

Requirement	CCO Activity	Deadline	Responsibility	Status	Compliance
Training	AODA training to be provided to all CCO Staff via the <i>e-accessibility</i> module CCO will also keep a record of all members of CCO staff who have completed training.	Training must be provided before Jan 1, 2010 for all existing CCO staff and must thereafter be provided on an ongoing basis to all new CCO staff.	Legal	COMPLETED, continuing on an as needed basis – Initial training for CCO Staff provided in Dec, 2009 and completed by CCO Staff by Jan 1, 2010.	Yes
Implement Feedback Process	A feedback process needs to be developed so that individuals can provide CCO with feedback on its provision of accessible services to persons with disabilities.	Jan 1, 2010	Web and Digital Services	COMPLETED	Yes
Notify public that documents required under the <i>Customer Service Standards</i> are available from CCO upon request	CCO's external website needs to include a statement that CCO's Customer Service Documents are available to the public upon request.	Jan 1, 2010	Web and Digital Services	COMPLETED	Yes
Dissemination of customer service standards and the AODA to CCO Staff	CCO to communicate to new and existing CCO staff the requirements of the AODA Customer Service Standards.	Initial roll out prior to Jan 1, 2010	Communications, Legal	COMPLETED, continuing on an as needed basis	Yes
TTY	TTY number to be put in place	Jan 1, 2010	Technology Services & Facilities	COMPLETED	Yes

Appendix “B”

Integrated Accessibility Regulation: Timeline to Completion Chart

PART 1 – General Requirements

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
Establishment of accessibility policies (s. 3)	Prepare one or more written documents describing policies on the Integrated Accessibility Standards and CCO’s commitment to achieving accessibility.	January 1, 2013	Legal	COMPLETED - Accessibility Policy drafted, and reviewed by CCO’s Accessibility Committee in Nov, 2012.	Yes
Establishment of accessibility policies (s. 3)	Make the documents publicly available, and provide in an accessible format upon request.	January 1, 2013	Web and Digital Services, Communications	COMPLETED - Accessibility Policy posted on CCO’s external and internal websites in Dec, 2012. As of January 2015, CCO’s <i>Accessibility Policy</i> has been incorporated into CCO’s combined <i>AODA Policy and Procedures</i> and posted on CCO’s website.	Yes
Procuring or acquiring goods, services or facilities (s. 5)	Incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable.	January 1, 2013	Procurement	COMPLETED – Procurement Policy, Procurement Documents, and legal agreements refer to CCO’s obligations under the <i>AODA</i> and Accessibility Standards.	Yes
Training (s. 7)	Provide training to all CCO employees and volunteers on the requirements of the Accessibility Standards and on the <i>Human Rights Code</i> . The	January 1, 2014	Legal	COMPLETED – CCO-wide training incorporating the <i>Integrated Accessibility Standards</i> was rolled out on April 2, 2013.	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
	training is to be appropriate to the duties of the individuals receiving the training.				
Training (s. 7)	Training is to be provided to all other persons who provide goods and services on behalf of CCO.	January 1, 2014	Procurement, Legal	Successful 3 rd party service providers to be provided with online training on the <i>AODA</i> prior to commencement of services for CCO. A clause to this effect has been included in all 3 rd party service contracts.	Yes

Part 2 – Information and Communication Standard

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
Feedback (s. 11)	Processes for receiving and responding to feedback shall be accessible through the provision or arranging for the provision of accessible formats and communication supports.	January 1, 2014	Web and Digital Services	COMPLETED Individuals can provide feedback to CCO either by calling the public inquiry line (accessible via TTY) or by submitting a Contact Form.	Yes
Feedback (s. 11)	Shall notify the public about the availability of accessible formats and communication supports.	January 1, 2014	Web and Digital Services	COMPLETED There is a statement to this effect on CCO's external website.	Yes
Accessible formats and communication supports (s. 12)	Shall, upon request, provide or arrange for the provision of accessible formats and communication supports for all public CCO information and communications for persons with disabilities.	January 1, 2015	Communications, Web and Digital Services	COMPLETED – ONGOING. CCO Communications continues to manage any requests for accessible formats in accordance with CCO's <i>AODA Policy</i> .	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
Accessible formats and communication supports (s. 12)	Shall notify the public about the availability of accessible formats and communication supports.	January 1, 2015	Communications, Web and Digital Services	COMPLETED – ONGOING. CCO's website contains a statement explaining how the public may make requests for accessible formats to CCO. CCO Communications continues to review all CCO public information and communications to ensure that all such information and communications include a statement that they are available in accessible formats upon request.	Yes
Accessible websites and web content (s. 14)	Internet websites and web content (excluding live captioning and audio description) must conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA. Note: This applies to all web content published on a website after January 1, 2012.	Jan 1, 2014 (Level A) Jan 1, 2021 (Level AA)	Web and Digital Services, Communications	COMPLETED current requirements, continuing on an as needed basis Sites developed after Jan 2012 are compliant to minimum Level A. CCO has taken steps to improve the accessibility of older sites.	Yes
Emergency procedure, plans or public safety information (s. 13)	Any CCO emergency procedures, plans or public safety information that are made available to the public must be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	January 1, 2012	Facilities, Web and Digital Services, People and Culture	COMPLETED, continuing on an as needed basis CCO's Fire Safety and Emergency Evacuation Procedures now include a statement that they are available in alternate formats upon request.	Yes

Part 3 – Employment Standard

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
Employee Recruitment, Selection and Support (ss. 23- 26)	CCO shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.	January 1, 2014	People and Culture	COMPLETED CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
Employee Recruitment, Selection and Support (ss. 23- 26)	During a recruitment process, CCO shall notify invited applicants that accommodations are available upon request in relation to the materials or processes to be used. If accommodation is requested, CCO shall consult with the applicant to ensure suitable accommodation respecting the applicant's disability.	January 1, 2014	People and Culture	COMPLETED CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
Employee Recruitment, Selection and Support (ss. 23- 26)	Successful applicants shall be notified of CCO's policies for accommodating employees with disabilities.	January 1, 2014	People and Culture	COMPLETED CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
Employee Recruitment, Selection and Support (ss. 23- 26)	As soon as practicable after they begin their employment, employees shall be informed of CCO's policies supporting employees with disabilities. Changes to CCO's policies shall be communicated to employees.	January 1, 2014	People and Culture	COMPLETED CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	Yes
Employee Recruitment,	Where requested, CCO shall consult	January 1, 2014	People and Culture	COMPLETED	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
Selection and Support (ss. 23- 26)	with an employee with a disability to ensure provision of accessible formats and communication supports for information needed to perform the employee's job and other information generally available to employees in the workplace.			CCO currently has a number of processes in place to ensure that accessibility is incorporated throughout the recruitment process.	
Workplace emergency response information (s.27)	Provide individualized workplace emergency response information to employees who have a disability, where necessary.	January 1, 2012	Facilities, People and Culture	COMPLETED, continuing on an as needed basis CCO's Fire Safety Plans and Emergency Evacuation Procedures were revised in Dec, 2011 to include an evacuation procedure for CCO Staff requiring additional assistance. CCO Staff requiring evacuation assistance can complete and send a copy of the Emergency Evacuation Assistance Request Form to People and Culture	Yes
Individual accommodation plans (s. 28)	CCO shall have a written process for developing documented individual accommodation plans (IAPs) for employees with disabilities.	January 1, 2014	People and Culture	COMPLETED	Yes
Return to work process (s. 29)	CCO shall have a return to work process for employees who have been absent from work due to a disability and require	Jan 1, 2014	People and Culture	COMPLETED	Yes

Requirement	Tasks	Deadline	Responsibility	Status	Compliance
	accommodation in order to return to work.				
Performance management (s. 30)	CCO shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans in the performance management process.	Jan 1, 2014	People and Culture	COMPLETED	Yes
Career development (s. 31)	CCO shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans in the career development process.	Jan 1, 2014	People and Culture	COMPLETED	Yes

Appendix “C”

Upcoming Integrated Accessibility Regulation Requirements At-a-Glance

Date	Category	Requirement
January 1, 2021	Information and Communications	All existing websites and their content must conform to WCAG 2.0 level AA