

Ministry of Labour >

Employment Standards

Health and Safety

Labour Relations

Jobs Protection Office

Agencies, Boards and Commissions >

Explore Government

Contacts >

Newsletters >

▶ What's New

▶ Safe At Work Ontario Today

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▶  RSS

Follow the Ministry >

▶  Twitter

▶  YouTube

▶  Facebook

Table of Contents |  [Print This Page](#)

2011-2012 Accessibility Plan

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Table of Contents

- [Introduction](#)
- Section One: [Report on Measures to Identify, Remove and Prevent Barriers in 2010-11](#)
 - Customer Service
 - Information and Communications
 - Employment
 - Built Environment
 - Procurement
 - Other
- Section Two: [Measures Planned for 2011-12 and Beyond](#)
 - Customer Service
 - Information and Communications
 - Employment
 - Built Environment
 - Procurement
 - Other
- Section Three: [Review of Acts, Regulations and Policies](#)
- [Glossary of Terms|Acronyms](#)
- [For More Information](#)

[Next](#)

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▶  YouTube

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[Table of Contents](#) |  Print This Page

Introduction

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Each year, the Government of Ontario sets a course to prevent, identify and remove barriers for persons with disabilities. Every ministry participates through its annual accessibility plans, as required under the [Accessibility for Ontarians with Disabilities Act, 2001](#) (ODA).

The [Accessibility for Ontarians with Disabilities Act, 2005](#) (AODA) is Ontario's roadmap to become barrier-free by 2025. It includes accessibility standards in:

- Customer service
- Information and communications
- Employment
- Transportation
- Built environment

This year the accessibility plans will help to inform planning requirements under the new Integrated Accessibility Standards (IAS) that came into force last summer under the AODA. The IAS requires the Government of Ontario to develop a multi-year plan to prevent and remove barriers for persons with disabilities.

Our annual accessibility plan outlines the specific steps the government is taking to improve opportunities for persons with disabilities.

Building on last year's plan, the ministry's 2011–12 accessibility plan will continue moving the Ministry of Labour toward the goal of an accessible province for all Ontarians.

The Ministry of Labour (MOL) has made significant progress towards making accessibility a part of its core business. The accessibility governance structure includes dedicated staff resources, an advisory leads committee and specifies managers throughout the organization as point persons to guide and oversee the implementation of the accessibility standards. The Ministry of Labour's strategic plan entrenches our commitment to improving accessibility and includes a key performance indicator that "the Ministry of Labour will communicate information openly, transparently and accessibly to all clients, stakeholders and the public." This ODA plan forms an integral component of the ministry's broader strategic plan.

To view other ministries' Accessibility Plans, visit [Ontario.ca](#).

[Previous](#) | [Next](#)

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Health and Safety

Labour Relations

Jobs Protection Office

Agencies, Boards and Commissions >

Explore Government

Contacts >

Newsletters v

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▶ Safe At Work Ontario Today

Subscribe v

▶  E-mail Alerts

▶  RSS

Follow the Ministry v

▶  Twitter

▶  YouTube

▶  Facebook

[Table of Contents](#) |  [Print This Page](#)

Section One: Report on Measures to Identify, Remove and Prevent Barriers in 2010-11

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The Government of Ontario is working to achieve an accessible province by 2025.

In 2010-11, the government continued to comply with the Accessibility Standards for Customer Service Regulation (O. Reg. 429/07) and continued to implement initiatives to enhance accessibility in other areas: employment, information and communication, transportation, the built environment and procurement.

This document includes a summary of the initiatives the Ministry of Labour implemented in 2010-11.

Customer Service

Initiatives undertaken by the Ministry of Labour have resulted in enhanced implementation of and compliance with the Accessibility Standards for Customer Service Regulation (Customer Service Standard) made under the [Accessibility for Ontarians with Disabilities Act, 2005](#) (AODA).

In 2010 and 2011 our ministry continued to improve its processes and practices for training, customer feedback, temporary service disruption requirements and other policies, procedures and practices, as set out in the Customer Service Standard.

To ensure compliance, the Ministry of Labour designated both an accessibility advisory group and point persons to effectively implement the Customer Service Standard and answer staff questions or handle public complaints or requests regarding accessible customer services.

Temporary Service Disruption Requirements

The ministry has a process in place in the event that there is a disruption to services or facilities that may impact on accessibility. A service disruption protocol exists for all ministry offices and service locations to ensure that employees and the public are notified in the event of a service disruption.

In the event of a service disruption the ministry follows an established process that is consistent with the obligations under the Customer Service Regulation. Service disruption notices were required in the following instances:

- On May 31, 2010, due to a major flow of water from a broken pipe in the ministry's Sudbury office, a notice of service disruption was posted at conspicuous place on premises and on website for the public.
- On December 8, 2010, a snow storm necessitated the closing of ministry offices as well as most of the City of London. The lead ministry in the building (not the MOL) communicated on website and posted notice at conspicuous place on premises about the closure of the building to the public.
- On January 24, 2011 due to flooding and electrical problems the building landlords at 400 University Avenue in Toronto posted service disruption notice in the lobby. The ministry updated its Emergency line with a service disruption message (212-EVAC).

Customer Feedback

The ministry has an accessible customer service feedback process in place.

Complaints are assigned to directors for resolution and follow-up is completed to ensure feedback is handled according to the principles of the AODA and the client is satisfied with the response.

In addition, the ministry continues to monitor and assign requests or complaints received from an online feedback site, the accessibility advisory leads group, and program managers.

The ministry received few requests for accessible services. All requests were resolved to the satisfaction of the client and were consistent with the principles set out in the AODA.

Some examples of these requests were:

- A stakeholder with a hearing disability requested an interpreter for a meeting with the Ministry of Labour. The ministry hired and paid for an interpreter from the Canadian Hearing Society.
- A College contacted the MOL seeking electronic formats of ministry's Acts and Regulations to assist students with vision loss. The ministry provided accessible electronic text versions.
- A client group requested the ministry's Acts and Regulations in alternate formats. The ministry provided an e-laws link along with various types of free downloadable readers that could accommodate different types of assistive devices.

Training and Awareness

At a Ministry of Labour Leadership Forum a session was held on multiple uses of the OPS Inclusion Lens. All managers, directors and senior leaders attended the learning session.

The ministry used multiple channels to promote awareness and encourage learning about accessibility issues.

- Center for Leadership and Learning (CFL) e-learning courses were promoted including using the Inclusion Lens, Mission Possible e-courses to create accessible documents at source in multiple electronic formats.
- Myworkplace@MOL (located on the ministry's Intranet) was regularly updated with new tools and resources to support accessibility awareness. These included, targeted presentations, e-courses, train-the-trainer, OPS Inclusion Lens training and best practices in implementing accessibility policies, practices and procedures.
- Through HR Update and Focus, managers and staff were provided with resources and articles of interest relating to accessibility, including how to help customers with different types of disabilities.

The Ministry of Government Service's Diversity Office recognized the Ministry of Labour Manager Toolkit and training materials for excellence in implementing the Customer Service Standard.

Accessibility awareness week was celebrated with a memo and video resources for managers to raise awareness among staff.

Ministry program areas were provided with the Inclusion Lens developed by the Diversity Office for consideration while implementing new programs, initiatives and legislation.

The ministry's orientation package and new e-learning orientation for new employees includes mandatory training for accessibility awareness.

Ministry program areas completed and documented all accessibility related training.

Ministry's emergency evacuation plan was reviewed and now includes evacuation protocols and processes to ensure the safety of persons with disabilities, and others who require assistance. These protocols and processes are now included in the annual briefing sessions for the ministry's emergency staff (emergency response leads, floor wardens and searchers).

Policies, procedures and practices

The ministry improved compliance with the accessible Customer Service Standard.

- Accessible customer service policy is built into appropriate education and outreach activities.
- Enhanced the existing feedback processes, following up on feedback received and responding with necessary changes.

Information and Communications

The ministry ensured that all new information posted to the existing and new external websites are fully accessible to persons with disabilities by using:

- structured HTML, for example, headings and lists
- text equivalent for images, for example, alternate tags
- text-equivalent for videos, for example, transcripts
- text-equivalents and descriptions for graphs and charts
- mark-up for acronyms and abbreviations
- data tables that use mark-up to associate data cells and header cells and provide a summary
- sufficient colour contrast between background and foreground colours
- text-accessible formats and PDF's
- cascading style sheets

The ministry continued to ensure its website met Cabinet Office's online design program requirements with:

- Cabinet Office accessible templates and code samples
- cascading style sheets for layout and style
- a common look and feel and a seamless user experience, for example, a mandatory footers on all sites that link to accessibility information.

Website accessibility issues were resolved in coordination with program areas.

Existing website content was reviewed for accessibility and new content was developed using proven accessible techniques.

New website features were tested by the Information and Information Technology (I&IT) Accessibility Centre of Excellence.

The ministry also continued to comply with the objectives of the Government of Ontario Information Technology Standard (GO-ITS) # 23: The standard ensures a consistent and positive experience for all Ontarians by defining quality web standards for accessibility and usability of government information services.

Employment

Standards and methods of employment accommodation for employees with disabilities continue to be communicated through internal e-mails, management development, leadership events and programs.

Ministry of Labour managers, directors and senior leaders were assessed using Equitable Leader Competencies that provide an evaluation of behavior in eight core competencies related to diversity. This multi-source feedback instrument provides developmental feedback for leaders and enables the leader to identify the areas in which they may need further development.

The Equitable Leader competencies include:

- Openness to Difference: Demonstrating a positive attitude toward others and actively seeking out opportunities to learn about cultures and lifestyles that are different.
- Equitable Opportunity: Making employment decisions, for example, promotion, placement on projects, development regarding team members on the basis of merit and skill.
- Accommodation: Demonstrating creativity when solving problems and adaptability when responding to the needs of different employees.
- Dignity and Respect: Creating a work environment that encourages open and transparent communication, and where the opinions and contributions of all team members are valued.
- Commitment to Diversity: Enthusiastically endorsing and participating in programs to create and support diversity in the workplace.
- Knowledge of Diversity: Engaging in behaviours that reflect a general understanding of the meaning of "diversity" and demonstrating knowledge of best practices and relevant legislation related to diversity.
- Change Management: Contributing to the development of an organization that values diversity through the implementation of effective change management practices.

Ethics and Integrity: Embodying the principles of fair and ethical conduct and demonstrating honesty, reliability, responsibility and constancy in one's daily work life.

Ergonomic assessments and assistive devices are provided to staff as necessary.

Built Environment

The ministry ensured current and any possible future ministry facilities will be accessible.

The Infrastructure Ontario (IO) Barrier-Free Design Guidelines were applied in the following relocation/renovation projects:

- 1290 Central Parkway, Mississauga, Operations Division
- 2275 Midland Avenue, Scarborough, Operations Division
- 305 Milner Drive, Scarborough, Office of the Worker Adviser
- 100 Ouellette Ave, Windsor, Office of the Worker Adviser
- 400 University Avenue, Employment Standard (ES) Project Team
- 400 University Avenue, Head Office Realignment
- 5001 Yonge Street, Central East Office
- 6711 Mississauga Road, Central West Office
- 119 King Street, Hamilton, ES project Team
- 70 Foster Drive, Sault Ste. Marie, Provincial Claim Centre

The ministry continued to work with Ministry managers to address accessibility issues for both employees and clients. For instance, large print, tactile lettering was added to floor signs to identify business units.

The Continuity of Operations Lead developed a guideline to assist ministry managers with developing their own service disruption notification protocols. The guideline was based on the materials from Emergency Management Ontario and the Diversity Office. The guideline advised managers of their posting responsibilities in the event of specific types of service disruption and depending on whether the building is government owned or leased.

The ministry landlords were notified of the AODA Customer Service Standard obligation to post a notice in the event of a service disruption and were provided with samples of signage.

The ministry facilities service providers, such as Infrastructure Ontario and Coldwell Banker Richard Ellis (CBRE), are reminded to post notices in the event of any disruption of services involving the ministry premises, for example, elevator upgrades and washroom closures.

The AODA guidelines and the updates to the service disruption notification protocols have been incorporated into the ministry's Continuity of Operations Plans since 2010.

Procurement

In accordance with the Ministry of Government Services' (MGS) new Procurement Directive the ministry's program areas took accessibility issues into account in the procurement of goods and services. For example, the Ministry in a contract stipulated that a vendor be compliant with the AODA to ensure that the services purchased by the ministry are accessible to people with disabilities.

The ministry also provides managers and staff, who have procurement responsibilities, with language to be included in service level contracts to ensure any procurement of goods and services have built in accessible service requirements.

The Economics and Transportation Cluster ensured all Internet applications met procurement requirements and were accessible to people with disabilities.

The ministry worked with the Economics and Transportation Cluster to use the OPS Inclusion Lens in its applications, services and purchases of new applications.

Other

The ministry ensured accessibility commitments and strategies were implemented through an effective governance framework involving an accessibility advisory leads group and managers as point persons.

During the Results-based Planning process initiatives and proposals were reviewed for compliance with ODA plans and AODA. Financial implications of accessibility standards were identified. Ministry's program areas were reminded of the need to consider accessibility requirements in developing or implementing any new activities and initiatives.

[Previous](#) | [Next](#)



Ministry of Labour >

Employment Standards

Health and Safety

Labour Relations

Jobs Protection Office

Agencies, Boards and Commissions >

Explore Government

Contacts >

Newsletters ▾

▶ What's New

▶ Safe At Work Ontario Today

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▶  RSS

Follow the Ministry ▾

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▶  YouTube

▶  Facebook

[Table of Contents](#) |  [Print This Page](#)

Section Two: Measures Planned for 2011–12 and Beyond

ISSN: 1708-363X
Issued: December 15, 2011
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This year, the Ministry of Labour's accessibility plan focuses on four areas. These initiatives will support compliance with the existing Accessibility Standards for Customer Service. They will also help us enhance accessibility in other areas:

- Employment
- Information & Communications
- The Built Environment and
- Procurement.

Customer Service

The Ministry of Labour's strategic plan states, "the Ministry of Labour will communicate information openly, transparently and accessibly to all clients, stakeholders and the public. They will receive services with the same high quality and timeliness as others."

Actions planned:

Temporary Service Disruption Requirements

In the event of a service disruption, the ministry will continue to implement the protocol for posting service disruption notices in all lead buildings as required.

In preparation for the 2012 Integrated Accessibility Standards Regulation (O. Reg. 191/11) (IASR) obligations, the ministry will ensure that any emergency procedures, plans and public safety information that is available to the public is available in accessible formats or with appropriate communication supports upon request.

Customer Feedback

The ministry will continue to monitor and assign complaints received regarding accessible services from the Internet feedback site, the accessibility advisory leads group, point persons, in-person or any other mode.

Complaints and requests will continue to be assigned to directors for resolution. Ministry staff responsible for accessibility will ensure matters have been resolved to the satisfaction of the client and according to the principles set out in the AODA.

Training and Awareness

In preparation for Integrated Accessibility Standards Regulation 2013 obligations, other than mandatory training for all ministry employees, the ministry is also developing a training plan targeted to key ministry positions in management, communications, policy, administration and public-facing telephone and enforcement services, to provide staff with training appropriate to their roles and responsibilities.

http://www.labour.gov.on.ca/english/about/pubs/accessibility/2011/2011_3.php[16/12/2011 2:41:44 PM]

The training plan will identify various courses, articles, training and other forms of learning and awareness building.

The accessibility advisory leads group and point persons will receive advanced orientation and training on the new Integrated Accessibility Standard Regulation.

All training provided to staff relating to accessibility will continue to be tracked by managers.

The accessible Intranet site, "Myworkplace", will be updated with new tools and resources to support accessibility awareness and best practices associated with the Integrated Accessibility Standard Regulation.

Training requirements under ODA and AODA continues to be incorporated into the ministry's orientation package. The new e-learning orientation program includes accessibility awareness and training for new employees.

The ministry's Senior Management Committee will be regularly briefed on progress made toward meeting the ministry's accessibility plan.

The ministry will continue the train-the-trainer approach and use WebEx technology to make training easily available to staff.

The ministry will promote new OPS accessibility information, communications training and education materials relating to Integrated Accessibility Standards Regulation obligations, as they become available.

The ministry will continue to provide resources and targeted training for staff required to make electronic documents accessible at source.

Policies, procedures and practices

The ministry will continue to highlight its ongoing compliance with the accessible Customer Service Standard:

- Accessible customer service policy in education and outreach activities.
- Enhanced feedback processes.
- Consideration of accessibility related feedback received.

Senior management will incorporate diversity, inclusion and accessibility commitments into performance plans. Performance commitments will specifically include the provision of accessible services and alternate formats.

Timeframe:

2011–2012

Information and Communications

The Ministry of Labour is committed to making government information and communications accessible to people with disabilities. The information we provide and the ways we communicate are key to delivering our programs and services to the public.

Actions planned:

The ministry's ongoing commitment is to make communication products accessible and to update the ministry's Intranet and Internet sites.

On the Internet the ministry will:

- Ensure that all resources posted to the existing external website or any new websites are fully accessible to persons with disabilities.
- Continue to ensure that the website meets all Government of Ontario and Ministry of Labour accessibility web standards and that existing and future web resources are developed accessibly.
- Work with staff who create documents for the public use to create web-ready, accessible documents at source using Hypertext Markup Language (HTML), Adobe 9 Pro and Microsoft (MS) Word Styles and Formats.
- Audit ministry website content annually for accessibility and ensure new content is in accessible formats and written in plain language.
- Work with program areas to address any new website accessibility issues.
- Continue to comply with the objectives of the Government of Ontario Information Technology

Standard (GO-ITS) #23.

- Conduct accessibility testing of any new applications, interactive content or any other new resource.
- Regularly review accessibility requirements and techniques to improve accessibility and usability.

On the Intranet the ministry will:

- Review, redesign and re-launch its Intranet site to meet accessibility requirements and user needs.
- Work with program areas to conduct a thorough review of the existing Intranet site for currency, usability and accessibility.
- Explore options to move the Intranet to a new platform that facilitates greater accessibility.
- Work with program areas to develop an accessible layout/design template with simple navigation to improve accessibility and ease of maintenance.
- Ensure that staff responsible for developing and maintaining Intranet content is fully aware of accessibility requirements and the impact on content development and workflow.
- Work with program areas to migrate existing relevant content and new resources to the redesigned Intranet using accessible techniques.
- Ensure that program areas participate in regular audits of the Intranet and that all Government of Ontario and Ministry of Labour accessibility web standards continue to be met.

Timeframe:

2011–2012

Employment

Given the Ministry of Labour's mandate and mission, the ministry strives to be a leader in fair and accessible employment practices. An organizational effectiveness goal of the ministry as set out its strategic plan, states: "the Ministry of Labour's reputation and achievements will be highly regarded and our expertise sought out by the OPS, other jurisdictions, our stakeholders and the public. And further the Ministry of Labour's organizational practices will attract and retain a talented, diverse and inclusive workforce and promote efficiency and effectiveness and retain talented employees with disabilities."

Actions planned:

The ministry will:

- Promote the Ontario Public Service, Human Resources directives policies and guidelines for accessible employment practices among managers.
- In preparation for IASR 2012 obligations where managers are aware of the need for accommodation provide individualized workplace emergency response information to employees who have a disability.
- Educate managers and inform employees about workplace accommodation.
- Offer and provide requested accommodation to all applicants throughout the recruitment process.
- Provide staff with ergonomic assessments and assistive devices.

When necessary, applications will be made to the Employment Accommodation Fund to meet the accessibility needs of the ministry.

Employment accommodation for employees with disabilities will continue to be communicated through internal emails and the ministry's management development programs and learning activities.

Inclusive practices will continue to be included in management programs.

Timeframe:

2013

Built Environment

The Ministry of Labour is committed to greater accessibility in and around ministry buildings.

Actions planned:

The ministry will:

- Ensure that current and future ministry facilities are accessible to people with disabilities by incorporating accessibility features when designing, procuring or acquiring new facilities.
- Continue to apply the Infrastructure Ontario Barrier-Free Design Guidelines in all relocation/renovation projects, for example, addition of strobe lights added to fire alarms for the hearing impaired and door handles are changed to lever handles.
- At 400 University Avenue, Ministry of Labour is working with Ministry of Citizenship and Immigration to make the employee lunchroom accessible.
- Continue to work with managers to identify opportunities and address areas that require accessibility improvements (for both employees and customers).
- Use an Inclusion Lens for all new accommodation projects.

Timeframe:

Ongoing

Procurement

The Ministry of Labour is committed to integrating accessibility considerations into our procurement processes.

Actions planned:

The Ministry of Labour will continue to:

- Incorporate accessibility into specific procurement initiatives. This includes, requiring vendors to build accessibility into the services or goods purchased by the ministry so that they are accessible to people with disability.
- Adopt Ontario Public Service procurement policies which consider the needs of persons with disabilities when procuring or acquiring good, services, or facilities.
- Audit procurement contracts for accessibility considerations.
- Participate in the Diversity and Accessibility Working Group on Procurement.
- Provide new and existing managers and staff that have procurement responsibilities with training on language to be included in Request for Proposals and service level contracts. Managers and staff will be reminded of the requirement to retain any AODA compliance information.
- Work with the Economics and Transportation Cluster on its use of the Ontario Public Service (OPS) Inclusion Lens in its applications, services and purchases of new applications.
- Ensure program areas are aware of accessibility requirements and work with the Economics and Transportation Cluster on all Internet applications that are procured and are accessible to people with disabilities.
- Use the Inclusion Lens in the procurement decision making process.

Timeframe:

2011–2012

Other

Actions planned:

The ministry program areas will:

- Commit to compliance with the ODA plan developed by the ministry.
- Be reminded of the accommodations necessary to make all services accessible.
- Ensure ODA and AODA accessibility standards are taken into account in Results-based Planning activities.

The ministry will adopt and implement new policies and practices developed by the Diversity Office in order to comply with Integrated Accessibility Standard Regulation obligations.

The Economics and Transportation Cluster will incorporate the use of Information and Information Technology (I&IT) Accessibility Guidebook. The Accessibility Guidebook informs and guides information technology (IT) professionals to incorporate accessibility in each step of the project life cycle. Therefore, any new or upgraded solutions will adhere to legislative obligations and support implementation of usable and accessible IT solutions.

Timeframe:

Ongoing

[Previous](#) | [Next](#)

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[Table of Contents](#) |  [Print This Page](#)

Section Three: Review of Acts, Regulations and Policies

ISSN: 1708-363X
Issued: December 15, 2011
Content last reviewed: December 2011

In support of our commitment to improve accessibility for people with disabilities, the Ministry of Labour will continue to review government initiatives, including legislation and policies, to identify and remove barriers.

Acts, Regulations and Policies Reviewed in 2010–11

In April 2011, the Ministry of Labour participated in training for multidisciplinary teams from all ministries on how to use the OPS Inclusion Lens to review laws for accessibility barriers. Going forward, the OPS Diversity Office and the Ministry of the Attorney General are working together to support a coordinated approach to legislative review across government.

Acts and Regulations

The Ministry of Labour is committed to ensuring that the Acts and Regulations for which it is responsible are reviewed for potential accessibility barriers.

The ministry considered accessibility issues in any new or amended legislation or regulations.

The Ministry's Legal Service Branch completed a review of three Ministry of Labour acts using the OPS Inclusion Lens.

Policies

The ministry:

- Ensured policies, practices and procedures were in place that support AODA and its standards and inform necessary staff of these requirements.
- Complaints were assigned to the appropriate branch for consideration and resolution. No complaints were received in 2010–2011.
- Ensured a resource toolkit was provided to all new managers and new assigned point persons for implementation of policies, practices and procedures at the branch and unit level.

Acts, Regulations and Policies to Be Reviewed in 2011–12

Actions planned:

The ministry will:

- Ensure accessibility issues are considered and addressed in any new or amended legislation or regulations.
- Continue to review existing Acts and Regulations for which the Ministry is responsible to identify

http://www.labour.gov.on.ca/english/about/pubs/accessibility/2011/2011_4.php[16/12/2011 2:42:15 PM]

opportunities to enhance accessibility using the OPS Inclusion Lens developed by the Diversity Office.

- Identify the OPS Inclusion Lens course - Making Acts and Regulations Barrier Free as necessary training for policy and Legal staff to ensure accessibility issues are considered and addressed in any legislation and regulations being proposed.

Timeframe:

2011–2012

Policies

Actions planned:

The ministry will:

- Ensure it has policies, practices and procedures in place that support AODA and inform necessary staff of the associated requirements.
- Continue to assign, track, monitor and report on complaints regarding the accessibility of services and make the necessary adjustments to the ministry's policies.
- Continue to update managers and other point persons to ensure effective implementation at the branch and unit level.
- Develop new ministry-level targeted training and implementation plans for the new Integrated Accessibility Standards Regulation.

Timeframe:

2011–2012

Inclusion Lens

In 2011, the Ontario Public Service launched the Inclusion Lens. The Lens is an innovative tool to help address diversity and accessibility. With this tool, ministries can identify and address potential barriers to people with disabilities, and others that may be present in existing or proposed legislation, policies, programs, practices or services.

In 2010–11, the Ministry of Labour:

- Managers, directors and senior leaders were provided orientation on the multiple uses of the OPS Inclusion Lens at a Leadership Forum held in June 2011.
- Staff attended training on the OPS Diversity Office's Inclusion Lens.
- Legal Services Branch that reviewed three MOL Acts attended a specialized Inclusion Lens training to help them identify and remove barriers in legislation and regulations.
- Organized an in-depth training session for accessibility advisory leads group and program area leads on the multiple uses of the Inclusion Lens.

In the future, our ministry will:

- Continue to use the Inclusion Lens to review acts, regulations, policies, programs, practices and services.
- Continue to organize targeted training sessions for program areas for new staff.
- Encourage staff to include the Inclusion Lens e-course in their yearly learning plans.
- Encourage staff to use the Inclusion Lens when developing or reviewing policies, programs or services.
- Promote new training being developed by the Diversity Office on the use of the Inclusion Lens as it relates to procurement, Result-based Planning, Information Technology and Human Resources.

[Previous](#) | [Next](#)



Ministry of Labour >

Employment Standards

Health and Safety

Labour Relations

Jobs Protection Office

Agencies, Boards and Commissions >

Explore Government

Contacts >

Newsletters >

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Follow the Ministry >

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▶  YouTube

▶  Facebook

[Table of Contents](#) |  [Print This Page](#)

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ISSN: 1708-363X
Issued: December 15, 2011
Content last reviewed: December 2011

- AODA**
Accessibility for Ontarians with Disabilities Act
- OPS**
Ontario Public Service
- ODA**
Ontarians with Disabilities Act
- IASR**
Integrated Accessibility Standards Regulation
- MGS**
Ministry of Government Services
- MOL**
Ministry of Labour
- IO**
Infrastructure Ontario
- HTML**
Hypertext Markup Language
- MS**
Microsoft
- PDF**
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[Previous](#) | [Next](#)

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Employment Standards

Health and Safety

Labour Relations

Jobs Protection Office

Agencies, Boards and Commissions >

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▶  Facebook

[Table of Contents](#) |  [Print This Page](#)

For More Information

ISSN: 1708-363X
Issued: December 15, 2011
Content last reviewed: December 2011

Questions or comments about the ministry's accessibility plan are always welcome.

Please phone:

- 416-326-7606
- 416-314-5811 (TTY)

E-mail: ODAinquiries@ontario.ca

Visit the [Ministry of Community and Social Services Accessibility Ontario web portal](#). The site promotes accessibility and provides information and resources on how to make Ontario a barrier-free province.

Alternate formats of this document are available free upon request from:

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