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Reflecting AODA and Best Practices: An Employer Compliance Checklist

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As a national, non-profit organization, Trucking HR Canada advances modern HR solutions for the trucking and logistics workforce. One of our strategic priorities is to make a company's job easier by delivering a comprehensive collection of up-to-date guides, reports, templates and more to support effective human resource management, recruitment, and retention efforts.

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WANT MORE?

Visit the HR Resource Library on Trucking HR Canada's website for up to date, practical HR management guides and tools designed specifically for trucking and logistics employers.

Employers participating in the 2024 THRC pilots of new tools can also refer to their [resource list](#) and are welcome to call their designated advisor for consultation and guidance.

THE LEGISLATIVE CONTEXT

This resource primarily references the *Accessibility for Ontarians with Disabilities Act*. This Ontario-based legislation outlines comprehensive standards that came into effect in 2005. They are requirements for Ontario employers and are good practice for others. Consult your own provincial or federal standards to confirm any specific requirements within your jurisdiction.

Federally regulated employees are subject to compliance with the *Accessible Canada Act* and the *Canadian Human Rights Act*. For more information on compliance with *Accessible Canada* regulations, please visit the following:

- [Accessible Canada Act: Guidance on the Accessible Canada Regulations.](#)
- [Canadian Human Rights Act: Rights in the Workplace.](#)

Employers who adopt the principles of this legislation will lead the market in their employment practices for persons with disabilities.

INTRODUCTION

The Accessibility for Ontarians with Disabilities Act (AODA) applies to all employers in Ontario however, the requirements can vary depending on the business' type and size. As private sector employers in Ontario, trucking and logistic companies can use this checklist as a guideline for compliance. **While employers outside Ontario are not governed by the AODA, this checklist can be used as a guideline for best practice.**

Ontario-based employers must understand and fulfill their obligations within each of the 5 standards including: Customer Service, Employment, Information and Communication, Design of Public Spaces and Transportation.

Note: The intent of this tool is to assist with act compliance as it relates to your workplace and the accessibility standards that apply to employees and potential employees of your organization. The Transportation standard applies only to organizations and agencies providing transportation services such as public transit, taxicabs and school boards, hospitals, and universities. This checklist does not include the Customer Service Standard which focuses on removing barriers for people with disabilities so they can access goods, services, and facilities that your business provides. For more information regarding requirements for this standard, please refer to *Accessibility for Ontarians with Disabilities Act*.

- Customer Service Standard (<https://www.aoda.ca/customer-care-standard/>)
- Customer Service Guide (<https://aoda.ca/customer-care-guide/>)

COUNTING EMPLOYEES

As you refer to the checklists below, here is how you count your employees.

DO include in your employee count:

- ✓ Full-time employees
- ✓ Part-time employees
- ✓ Seasonal employees
- ✓ Contract workers

DO NOT include in your employee count:

- X Employees outside Ontario
- X Volunteers
- X Independent contractors

Note: In Ontario, your company is still responsible for delivering *Accessibility for Ontarians with Disabilities Act* training to contractors that provide services on your behalf.

GENERAL REQUIREMENTS

Requirement	Employee Count 1-19	Employee Count 20-49	Employee Count 50+
CREATE POLICIES TO ACHIEVE ACCESSIBILITY GOALS	<p>Required to:</p> <ul style="list-style-type: none"> create accessibility policies but not required to document them (although it is recommended) 	<p>Required to:</p> <ul style="list-style-type: none"> create accessibility policies but not required to document them (although it is recommended) 	<p>Required to:</p> <ul style="list-style-type: none"> create policies and document them tell employees, customers and notify the public about the policies provide policies in an accessible format when requested. <p><i>Accessible formats could include but not be limited to: HTML, Microsoft Word, braille, audio formats, large print, and text transcript of visual and audio information.</i></p>

TRAIN STAFF AND VOLUNTEERS	<p>Required to train all employees on:</p> <ul style="list-style-type: none"> the Ontario Human Rights Code accessible customer service practices any accessibility requirements that apply to individual job duties and your organization 	<p>Required to train all employees on:</p> <ul style="list-style-type: none"> the Ontario Human Rights Code accessible customer service practices any accessibility requirements that apply to individual job duties and your organization 	<p>Required to train all employees on:</p> <ul style="list-style-type: none"> the Ontario Human Rights Code accessible customer service practices any accessibility requirements that apply to their job duties and your organization keep records of this training including how many people were trained and the date the training was provided
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For more information on what types of training are legally required and who is required go through it, please visit: <https://aoda.ca/aoda-training-requirements-who-needs-it-and-why/>

CREATE MULTI-YEAR ACCESSIBILITY PLAN	Not required	Not required	<p>Required to:</p> <ul style="list-style-type: none"> create and document a multi-year accessibility plan post the plan on the company website provide the plan in an accessible format when requested review the plan and update every 5 years <p>For more information, see: [ON] How to create an accessibility plan and policy</p>
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EMPLOYMENT

Requirement	Employee Count 1-19	Employee Count 20-49	Employee Count 50+
ACCOMMODATE EMPLOYEES WITH DISABILITIES THROUGHOUT THE ENTIRE RECRUITMENT, SELECTION AND EMPLOYMENT LIFECYCLE	Required to: <ul style="list-style-type: none"> • make recruitment processes accessible • inform employees regarding the availability of supports • offer accessible formats and communication support for employees • provide individual accessible workplace emergency response information • consider the needs of employees with disabilities if you have performance management, career development and re-deployment processes 	Required to: <ul style="list-style-type: none"> • make recruitment processes accessible • inform employees regarding the availability of supports • offer accessible formats and communication support for employees • provide individual accessible workplace emergency response information • consider the needs of employees with disabilities if you have performance management, career development and re-deployment processes 	Required to: <ul style="list-style-type: none"> • make recruitment processes accessible • inform employees regarding the availability of supports • offer accessible formats and communication support for employees • provide individual accessible workplace emergency response information • consider the needs of employees with disabilities if you have performance management, career development and re-deployment processes • document individual accommodation plans (IAP) • create a return-to-work process and plan

The *Accessibility for Ontarians with Disabilities Act* describes in greater detail how your company can design an accessible recruitment process: <https://www.aoda.ca/how-to-make-the-hiring-process-accessible/>

For tips specific to the trucking and logistics industry, employers participating in the 2024 Disability Inclusion pilot project can see these [THRC tools](#):

- Attracting new talent – Persons with Disabilities*
- Disability Inclusive Hiring Practices*
- Successful Onboarding and Early Days – Employees with Disabilities*

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INFORMATION AND COMMUNICATION

Requirement	Employee Count 1-19	Employee Count 20-49	Employee Count 50+
PROVIDE ACCESSIBLE INFORMATION	Applies to: <ul style="list-style-type: none"> emergency and public safety information feedback processes for employees and the public information provided to employees other public information provided in print, on websites or handheld devices 	Applies to: <ul style="list-style-type: none"> emergency and public safety information feedback processes for employees and the public information provided to employees other public information provided in print, on websites or handheld devices 	Applies to: <ul style="list-style-type: none"> emergency and public safety information feedback processes for employees and the public information provided to employees other public information provided in print, on websites or handheld devices
	Required to: <ul style="list-style-type: none"> inform the public and employees that written information and other forms of communication will be made accessible upon request. This can be accomplished through <ul style="list-style-type: none"> - note on your website - sign on business window - posting on a bulletin board 	Required to: <ul style="list-style-type: none"> inform the public and employees that written information and other forms of communication will be made accessible upon request. This can be accomplished through <ul style="list-style-type: none"> - note on your website - sign on business window - posting on a bulletin board 	Required to: <ul style="list-style-type: none"> inform the public and employees that written information and other forms of communication will be made accessible upon request. This can be accomplished through <ul style="list-style-type: none"> - note on your website - sign on business window - posting on a bulletin board
	Required to: <ul style="list-style-type: none"> provide accessible information or communications supports when requested when a person with a disability makes a request, work with them to figure out how to meet their needs accessible formats don't need to be on hand, but it does need to be provided in a timely manner 	Required to: <ul style="list-style-type: none"> provide accessible information or communications supports when requested when a person with a disability makes a request, work with them to figure out how to meet their needs accessible formats don't need to be on hand, but it does need to be provided in a timely manner 	Required to: <ul style="list-style-type: none"> provide accessible information or communications supports when requested when a person with a disability makes a request, work with them to figure out how to meet their needs accessible formats don't need to be on hand, but it does need to be provided in a timely manner
	Not Required	Not Required	Required to: <ul style="list-style-type: none"> make all public websites accessible (conform to the web content accessibility guidelines (wcag) 2.0, at level AA except where this is impracticable) where it is impracticable, the company will provide an explanation upon request the organization that controls the website must meet the accessibility requirements

Note: Organizations cannot charge more for providing accessible formats than they do for other formats.

PUBLIC SPACES

Requirement	Employee Count 1-19	Employee Count 20-49	Employee Count 50+
CREATE ACCESSIBLE PUBLIC SPACES ON YOUR BUSINESS PROPERTY	Required to: <ul style="list-style-type: none"> • establish a baseline level of accessibility for your public spaces including: <ul style="list-style-type: none"> - parking lots and sidewalks - service counters - fixed waiting lines - waiting areas with fixed seating - public eating areas 	Required to: <ul style="list-style-type: none"> • establish a baseline level of accessibility for your public spaces including: <ul style="list-style-type: none"> - parking lots and sidewalks - service counters - fixed waiting lines - waiting areas with fixed seating - public eating areas 	Required to: <ul style="list-style-type: none"> • establish a baseline level of accessibility for your public spaces including: <ul style="list-style-type: none"> - parking lots and sidewalks - service counters - fixed waiting lines - waiting areas with fixed seating - public eating areas

Note: This standard only applies to new construction and renovated existing public spaces.

ACCESSIBILITY COMPLIANCE REPORTING

Requirement	Employee Count 1-19	Employee Count 20-49	Employee Count 50+
CREATE AND FILE AN AODA COMPLIANCE REPORT	Not required	Required to: <ul style="list-style-type: none"> • file a report every 3 years 	Required to: <ul style="list-style-type: none"> • file a report every 3 years

Note: The next reporting deadline is Dec. 31st, 2026.

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