Time for Large Ontario Employers to Review their Multi-Year Accessibility Plans

September 03, 2019

Effective January 1, 2014, private sector employers with 50 or more employees in Ontario had to have multi-year accessibility plans in place and posted on their websites. A multi-year accessibility plan must outline the employer's strategy for preventing and removing barriers faced by individuals with disabilities, and for meeting all of the requirements under the *Integrated Accessibility Standards*, Ontario Regulation 191/11 (the Regulation).

The Regulation requires employers to review and update their accessibility plans at least once every five years. That means that this year, five years after the requirement was put in place, large private sector employers are due to undertake a review of their multi-year accessibility plans. Next year, in 2020, employers will also have to file accessibility compliance reports by December 31, so it is important that the requirement to review and update their multi-year plans does not slip through the cracks. Key dates to comply with accessibility standards are available on the Government of Ontario website.

Additional Accessibility Update

An Information and Communications Standards Development Committee (the Committee) has recently issued recommendations for updating and amending the Information and Communication Standards contained in the Regulation. The Committee is now calling for feedback on these recommendations. All feedback must be submitted by September 27, 2019.

The Information and Communication Standards address requirements relating to the following areas:

- website accessibility;
- feedback processes;
- accessible formats and communication supports for individuals with disabilities;
- emergency procedures and plans;
- educational and training resources and materials;
- training to educators;

- production of educational or training material; and
- libraries (both education and training institution libraries and public libraries).

Other notable recommendations include:

- Organizations should be required to obtain agreement from individuals requesting communication supports or accessible formats about the specific support or format to be provided and the timeframe in which it is to be provided;
- The website standards should be broadened to include mobile applications;
- Additional accessibility design, criteria and features ought to be incorporated when procuring goods, services and facilities;
- Various exemptions from the website standards ought to be removed, including those currently exempting extranets and intranets and pre-2012 active content;
- Certification requirements of provincially regulated professions must include knowledge and application of accessibility and the prevention of attitudinal barriers; and
- A new category of “high-impact” organizations should be created to capture organizations that do not have many employees in Ontario, but have a widespread impact on Ontarians through services provided. These organizations would be subject to the same requirements as large organizations.

It remains to be seen what recommendations, if any, will actually be implemented through amendments to the Regulation, however, it is worthwhile for employers and service providers alike to review the recommended changes and to consider whether they have concerns arising out of their experiences with the Information and Communication Standards so far, or whether they have concerns about the recommendations that they want to raise through the Committee’s feedback process.

By

Stephanie Young

Expertise

Labour & Employment

BLG | Canada's Law Firm

As the largest, truly full-service Canadian law firm, Borden Ladner Gervais LLP (BLG) delivers practical legal advice for domestic and international clients across more practices and industries than any Canadian firm. With over 800 lawyers, intellectual property agents and other professionals, BLG serves the legal needs of businesses and institutions across Canada and beyond – from M&A and capital markets, to disputes, financing, and trademark & patent registration.

blg.com

BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

The information contained herein is of a general nature and is not intended to constitute legal advice, a complete statement of the law, or an opinion on any subject. No one should act upon it or refrain from acting without a thorough examination of the law after the facts of a specific situation are considered. You are urged to consult your legal adviser in cases of specific questions or concerns. BLG does not warrant or guarantee the accuracy, currency or completeness of this publication. No part of this publication may be reproduced without prior written permission of Borden Ladner Gervais LLP. If this publication was sent to you by BLG and you do not wish to receive further publications from BLG, you may ask to remove your contact information from our mailing lists by emailing unsubscribe@blg.com or manage your subscription preferences at blg.com/MyPreferences. If you feel you have received this message in error please contact communications@blg.com. BLG's privacy policy for publications may be found at blg.com/en/privacy.

© 2026 Borden Ladner Gervais LLP. Borden Ladner Gervais LLP is an Ontario Limited Liability Partnership.