Accessibility Policy and Plan

Revision	Date	Author	Description
	June 2024		Initial Release

Overview

The *Accessibility for Ontarians with Disability Act, 2005* (the "AODA") is a provincial statute that outlines the requirements for developing, implementing, and mandating accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises.

A detailed compliance framework is included in the Integrated Accessibility Standards Regulation (IASR) (O. Reg. 191/11) that defines the standards for accessibility in areas including:

- Customer service
- Employment practices
- Information and communication
- Transportation
- Design of public spaces

The Accessibility Policy (the "Policy") is developed to ensure that DEFSEC meets its compliance obligations for accessibility set out in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and Ontario Regulation 191/11 - Integrated Accessibility Standards Regulation (IASR) (collectively, "AODA") and in consideration of the related provisions of the Ontario *Human Rights Code*, the *Workplace Safety Insurance Act, 1997,* and the *Occupational Health and Safety Act*.

Purpose

This policy defines:

- DEFSEC's (herein referred to as the Company) vision and goals for accessibility.
- Expectations to ensure compliance with the AODA, its standards and regulations, other applicable legislation, and Company policies.

The overall goal is to increase accessibility for persons with disabilities in a way that is respectful of their dignity and independence.

Application and Scope

This Policy applies to all Company employees and contractors and pertains to all services provided by the Company.

In scope are the accessibility needs of persons with disabilities including customers and Company employees.

Policy Statement

DEFSEC is committed to establishing a barrier-free environment and meeting the requirements of the AODA and the organizational policies that address employees' human rights and privacy.

In fulfilling its mandate, the Company strives to provide its services in a way that respects the dignity and independence of people with disabilities. The Company is also committed to ensuring people with disabilities have the same opportunity to access Company services and benefits as others.

DEFSEC is also committed to ensuring its employment practices are accessible to meet the needs of employees and job applicants with disabilities.

To deliver on these commitments, the Company will identify, prevent, and remove barriers to accessibility that might interfere with the ability of the people with disabilities to interact with the Company, or obtain goods and/or services in a timely manner, use Company facilities, or work productively in the Company's workplace.

Definitions

For the purpose of this policy:

AODA means, the *Accessibility for Ontarians with Disability Act, 2005* and its Regulations.

Accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product, or environment.

Accessible formats may include, but are not limited to, large print, recorded audio, electronic formats, braille, and other formats usable by persons with disabilities.

Assistive devices mean an auxiliary aid such as communication aids, cognition aids, personal mobility aids, mobility assistive devices, and medical aids (canes, wheelchairs, crutches, or hearing aids).

Barrier means anything that keeps someone with a disability from participating in all aspects of society. Examples of barriers include:

- Physical and architectural barriers: Occur in the environment and prevent access for people with disabilities.
- Information or communications barriers: Arise when a person with a disability cannot easily receive and/or understand information that is available to others (e.g. publications that are not available in large print, digitally, Braille, or other accessible formats).

- Technological barriers: Occur when technology or the way it is used does not meet the needs of people with disabilities (e.g. a website that does not support screen reading software).
- Attitudinal barriers: May result in people with disabilities being treated differently than people without disabilities (e.g. a receptionist who talks to an individual's support person rather than the individual with a disability).
- Systemic barriers: Policies, practices, and procedures result in people with disabilities being treated differently than others or sometimes excluded altogether.

Customers means the subset of the general public to whom the Company provides goods, services, and facilities, in the ordinary course of business, including, but not limited to, injured workers, employers, and other representatives of the public.

Communication supports may include, but are not limited to, captioning, alternative, and augmentative communication supports (i.e. methods used to supplement or replace speech or writing for those with impairments in the production or comprehension of spoken or written language), plain language, sign language, and other supports that facilitate effective communication.

Guide Dog means a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act,* to provide mobility, safety, and increased independence for people who are blind.

Information means data, facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Person Requiring Assistance (PRA) means a person identified as requiring assistance at the time of an evacuation. This can be due to a medical condition or some other reason.

Person with Disabilities means an individual who has a disability. "Disability" is defined in the Ontario *Human Rights Code* as:

a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect, or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or in a wheelchair or other remedial appliance or device.

b) A condition of mental impairment or a developmental disability.

c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.

d) A mental disorder.

e) An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997.*

Service Animal means a service animal for a person with a disability if:

a) The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal.

b) The person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:

- The College of Audiologists and Speech-Language Pathologists of Ontario
- The College of Chiropractors of Ontario
- The College of Nurses of Ontario
- The College of Occupational Therapists of Ontario
- The College of Optometrists of Ontario
- The College of Physicians and Surgeons of Ontario
- The College of Physiotherapists of Ontario
- The College of Psychologists of Ontario
- The College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

Support Persons means any person, whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability in order to help with communication, mobility, personal care, medical needs, access to goods, services or facilities.

Temporary Disruption means a short term planned or unplanned disruption to facilities or services that persons with disabilities usually use to obtain the Company's goods and/or services.

Undue Hardship: The duty to accommodate obliges the employer to make reasonable efforts to alter the workplace to accommodate an employee's disability related needs thus allowing the employee to properly carry out their work duties. This duty stops short of the employer experiencing "undue hardship". Such undue hardship generally involves excessive interference with a business' operation, or an increased risk to the health and safety of the employee, co-workers, or others. What constitutes undue hardship varies based on the circumstances surrounding each individual case.

Web Content Accessibility Guidelines (WCAG) means the World Wide Web Consortium Recommendation, dated December 2008, entitled *Web Content Accessibility Guidelines 2.0*.

Requirements

Accessible Customer Service

The Company will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all customers receive the same value and quality.
- Allowing customers with disabilities to do things in their own way and at their own pace when accessing goods and services provided this does not pose a safety risk

- Using alternative methods, when possible, to ensure that customers with disabilities have access to the same services, in the same place, and in a comparable manner.
- Taking individual needs into account when providing goods and services.
- Communicating in a manner that takes the customer's disability into account.

Employees and agents are encouraged to be proactive in seeking solutions and removing barriers, as well as alerting all customers to the range of available accommodations.

It is recommended that employees use the term "persons with disabilities" or "people with disabilities" and if a specific condition must be referenced, the condition be referenced last (e.g., person with low vision). To guide communication and interaction with or about people with all types of disabilities:

- It is important to put people first. It is more appropriate to say, "person with a disability", rather than "disabled person" or "the disabled".
- It is best not to make assumptions. Wait until an individual describes their disability to you. Disabilities can be complex, and our assumptions may be inaccurate.

Guide Dogs and Service Animals

If a customer with a disability is accompanied by a guide dog, a service dog, or another service animal, the Company will allow the person to enter any Company facility with the animal and to keep the animal with them.

If it is not readily apparent that the animal is being used by the customer for reasons related to their disability, the Company may request verification from the customer. Verification may include:

- A confirmation that the person requires the animal for reasons related to the disability (see Service Animal definition).
- A certificate of training from a recognized guide dog or service animal training school.

It is the responsibility of the customer with a disability to ensure that their service animal is under their control at all times.

Use of Support Persons

If a person with a disability is accompanied by a support person, the Company will ensure that both are allowed to enter its premises together, and that the person with a disability is not prevented from having access to the support person.

The Company may require the person with a disability to be accompanied by a support person when on the Company's premises in the event that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises. This may only occur after consulting with the person with a disability.

Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing the Company's goods and/or services. In cases where the assistive device presents a safety concern

or where a barrier may exist, other reasonable measures may be used to ensure the access of goods and/or services.

The Company will ensure that its employees and agents are familiar with the use of assistive devices available on the Company's or its agent's premises, as appropriate to their duties, and inform persons with disabilities of the available assistive devices.

Notice of Temporary Disruptions

Service or facilities related disruptions may occur due to reasons that may or may not be within the control or knowledge of the Company. Where possible, when a temporary disruption occurs, the Company will take reasonable steps to continue assisting people with disabilities.

The Company will provide customers with notice in the event of a planned disruption in the facilities or services usually used by people with disabilities.

In the event of an unexpected disruption, the Company will make reasonable efforts to contact customers with disabilities that may be impacted by the disruption prior to their scheduled meetings.

The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

Notice(s) will be placed at visible place(s) on the premises (e.g., public entrances, service counters) and posted on the Company website. When posted notices are used, there must also be a plan to convey the information to people who may not see or cannot understand the signage.

Feedback Process

The ultimate goal of the Company is to meet customer expectations while serving customers with disabilities.

The feedback process allows customers to provide comments through the website, by email, phone, or in-person.

Accessible formats and communication supports will be made available upon request to persons wishing to provide feedback. Privacy will be respected throughout the process.

The Company's response will be in a format that respects the communication preference of the person with a disability. Additional time may be required for follow-up depending on the format of response required.

Availability of Accessibility Documents

All documents required by the Accessibility Standards for Customer Service, including the Company accessibility policy, notices of temporary disruptions, and written feedback process will be available upon request.

When providing these documents to a person with a disability, the Company will endeavor to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

Where the Company determines that these documents cannot be converted into an accessible format, the Company will provide the person requesting the information or communication with:

- An explanation as to why the information or communications are inconvertible.
- A summary of inconvertible information or communication.

AODA Training

The Company will ensure that training, using appropriate methodologies, is provided to the following:

- All employees.
- People engaged to deliver goods and/or services and/or facilities on the Company's behalf.
- Any person involved in developing Company policies, as required by the AODA

Training will be provided to each person according to their duties as soon as reasonably practicable. Ongoing training will be provided in connection with changes to the Company's policies, practices, and procedures governing the provision of goods and/or services and/or facilities to persons with disabilities.

The Company will maintain a training plan that integrates the requirements of the AODA.

The Company will ensure that the amount and format of training will be in relation to the person's level of interaction with Company customers.

The Company will maintain a record of the dates on which the training is provided and the individuals to whom it is provided.

Regardless of the format, training will cover the following:

- A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Accessibility Standards for Customer Service.
- Instructions on how to interact and communicate with people with diverse types of disabilities.
- Instruction on how to interact with people with disabilities who:
    - Use an assistive device(s).
    - Require the assistance of a guide dog, service dog, or other service animal.
    - Require the use of a support person.

- Instructions on how to use equipment available on Company premises that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing Company services.
- Company policies, procedures, and practices pertaining to providing accessible customer service to customers with disabilities.

Information and Communication

Accessible Formats Available Upon Request

The Company will provide, upon request, information under the Company's control, relating to the Company's goods and/or services. Where possible, appropriate accessible format or communication supports will be used. Such information will be provided in a timely manner and consider the accessibility needs of the person with a disability. This information will be provided at a cost that is no more than the regular cost charged to others.

The Company will notify the public about the availability of accessible formats and communication supports through its website and will engage in an ongoing process of identifying additional accessible formats and communications supports that may be offered by the Company.

Where the Company determines that information or communications cannot be converted into an accessible format, the Company will provide the person requesting the information or communication with:

- An explanation as to why the information or communications are inconvertible.
- A summary of inconvertible information or communication.

Website Accessibility

Any new internet websites or web-based applications (including when making significant modifications to these) controlled directly by the Company or through a contractual relationship that allows for modification of a product, will conform to the WCAG Level A and increasing to level AA.

The Company will continue to work towards increasing the accessibility of its existing web content, website(s) and web-based applications.

Beginning January 1, 2021: all public websites and web content posted after January 1, 2012, will meet WCAG 2.0 Level AA other than criteria 1.2.4 (live captions) and 1.2.5 (pre-recorded audio descriptions).

Multi-Year Accessibility Plan and Annual Progress Reports

The Company will maintain and make public a Multi-Year Accessibility Plan to improve the accessibility of its goods, services, and facilities and meet the compliance requirements of the

AODA. The Plan will be updated at least once every five years and then posted on the Company's external website.

The Company will prepare an annual status report on the progress of measures taken to implement the Multi-Year Accessibility Plan.

Publicly Available Emergency Procedures and Safety Information

The Company prepares for emergency situations and develops protocols for the protection of, and assistance to, everyone on Company premises during an emergency. Publicly available emergency procedures and safety information will be made available in an accessible manner upon request.

Upon request, the Company will work with the building's landlord to provide publicly available emergency procedures and safety information related to the building, to Customers in an accessible format or with appropriate communication supports.

Procurement

Where practical, the Company will incorporate accessibility criteria and features during procurement or acquisition of goods, services, and facilities. The Company will provide an explanation where it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities.

Employment

Notice of Accommodation Availability in Recruitment and Selection

The Company is committed to fostering and sustaining an inclusive and accessible workplace that allows all employees to fully participate. Company policies promote the recruitment, retention, and development of talented employees through equitable and barrier-free practices. The Company uphold the rights of all employees to be treated with dignity, respect, and equality. Every staff member is expected to contribute to creating and sustaining a workplace that is respectful and inclusive of individual needs and differences.

Human Resources sets out the framework for human resources policies. All directives, policies, and practices encompass the principles of inclusion and accessibility.

Accessible Formats and Communications Supports for Employees

Upon request by an employee with a disability, the Company will provide, or arrange for, accessible formats and communication supports for information that is needed to perform their job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, the Company will consult with the employee making the request.

Accessible formats and communications supports regarding general workplace information will also be provided to employees with disabilities.

The Company will ensure that a formalized process is in place for the development of documented individual accommodation plans for employees with disabilities.

Workplace Emergency Response Information and Individualized Plans for Employees

Where the Company is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as possible.

Employee-wide communication is to be deployed to identify employees with disabilities who will require workplace emergency response assistance.

A process for communicating individual emergency response plans to floor fire wardens will be implemented so as to maintain the privacy of any medical information that may be disclosed during the accommodation process.

Documented Individual Accommodation Plans for Employees

The Company will establish a process for developing documented individual accommodation plans for employees with disabilities. If requested, the accommodation plan can include information regarding accessible format and communication supports provided, individualized emergency response information, and any other accommodation that is to be provided.

Design of Office Layout and Public Spaces

When facilities management constructs or redevelops Company public spaces such as, service counters and waiting areas the Company will do so in keeping with requirements set out in the Integrated Accessibility Standards - The Design of Public Spaces Standards and Ontario's Building Code.

Roles and Responsibilities

Human Resources is responsible for:

- Documenting, maintaining, and updating this policy.
- Preparing the annual status report in consultation with areas that have specific AODA responsibilities and making it available on the Company's website.
- Ensuring the AODA Multi-Year Accessibility Plan, the annual status report, and relevant AODA information are posted on the Company website.
- Filing the AODA Corporate Compliance Report with the Ontario Government.
- Addressing AODA concerns escalated to the Accessibility Office.
- Ensuring internet, intranet, and SharePoint content conforms to the Company's accessible design standards.
- Ensuring that feedback process is documented and is working effectively as required and soliciting such feedback.

- Upon request, converting information, by persons with disabilities in an accessible format or ensuring the use of appropriate communication supports, where available.
- Participating in planning for the management of customers with disabilities during emergency situations.
- Assisting in formulating security plans and the posting of signage when there is a disruption to accessible services.
- Ensuring emergency plans are established and annually reviewed for Company employees who require assistance.
- Meeting AODA requirements when procuring goods, services, or facilities
- Incorporating accessibility design criteria and features in the development of new tools and systems or when a significant upgrade is being implemented.

Directors, Managers, and Supervisors are responsible for:

- Raising awareness to facilitate understanding of the policy.
- Demonstrating sensitivity to and respecting confidentiality of information.
- Participating and co-operating to facilitate workplace accommodation, including the development of contingency plans.

Reception employees are responsible for:

- Ensuring reception area and equipment in reception area are accessible.
- Reporting any accessibility and/or equipment concerns for reception area to management for resolution.
- Formulating plans, in conjunction with management and security, for advising customers and delivery services if reception area or Company building is not accessible for people with disabilities.

All employees are responsible for:

- Ensuring they understand the intent of this policy.
- Complying with the provisions of this policy.
- Completing required training.

Employees with disabilities are responsible for:

- Participating and cooperating with all parties to facilitate workplace accommodation.
- Informing Human Resources of their need for accommodation in an emergency.

Policy Maintenance

This Policy is reviewed every three years or sooner, if necessary.

Inquiries about the Policy should be addressed to Human Resources.

Related Documents

This Policy should be read in conjunction with the following documents, as applicable:

- *Accessibility for Ontarians with Disabilities Act, 2005* (AODA)
- Integrated Accessibility Standard Regulation (IASR)
- *Blind Persons' Rights Act*
- *Ontarians with Disabilities Act, 2001*
- Ontario *Human Rights Code*
- *Workplace Safety and Insurance Act,1997*