

MULTI-YEAR  
**ACCESSIBILITY PLAN**

**2021-2026**

# Table of Contents

Message from the Director.....	4
Statement of Commitment.....	5
Accessible Emergency Information.....	6
Accessibility in Action.....	7
Training.....	7
Employment.....	7
Design of Public Spaces.....	7
Customer Service.....	7
Information and Communications.....	8
Overview of Objectives: 2021-2026 Plan.....	9
Training.....	9
Planned Actions.....	9
Outcomes.....	9
Information and Communications.....	10
Planned Actions.....	10
Outcomes.....	10
Employment.....	11
Planned Actions.....	11
Outcomes.....	11
Additional Information.....	12
Glossary of Terms.....	13
Accessible Formats.....	13
Assistive Device.....	13
Communication Supports.....	13
Conversion Ready.....	13
Disability.....	13
Guide Dog.....	13
Information.....	14
Internet Website.....	14
Intranet Website.....	14
Kiosk.....	<b>Error! Bookmark not defined.</b>
Redeployment.....	14
Service Animal.....	14
Service Dog.....	14

Support Person.....14  
Web Content Accessibility Guidelines .....14

## Message from the Director

WalterFedy and AEC's Accessibility Plan represents our intentions to meet and exceed our obligations under the Ontarians with Disabilities Act (ODA) 2001 and identifies our achievements in this work over the past few years.

We are committed to our responsibilities under the Ontario Human Rights Code (OHRC), and under the Accessibility for Ontarians with Disabilities Act (AODA) and the Integrated Accessibility Standards Regulation (2011), and our commitments continue to grow and evolve. Our previous efforts in this area have resulted in tangible accomplishments across our organization related to communication, improved recruitment practices, and the design of our office spaces.

We are building on our past work, to further commit to achieving our accessibility goals in a way that promotes and ensures respect for every person's human rights, dignity and independence. Our intention is that we are one step ahead in removing barriers, so we may act before they have the opportunity to impact our employees and our clients. Our focus extends beyond physical barriers and includes those that we can't touch and feel.

As we look to the future, we know there is still much work to be done in ensuring that we prioritize accessibility for all. This work will be done in collaboration with senior leadership to identify and eliminate barriers in our system that would otherwise contravene the Ontario Human Rights Code (OHRC) and represents our ongoing commitment to begin to remove systemic barriers.

We invite you to review our Accessibility Plan 2021-2026 and would welcome any questions or feedback.



Victoria Campbell  
Director, Human Resources

## **Statement of Commitment**

WalterFedy is committed to treating all people in a way that allows them to maintain their dignity and independence.

We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner.

We will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

## **Accessible Emergency Information**

We are committed to providing our clients with publicly available emergency information in an accessible way upon request.

We will also provide employees with disabilities with individualized emergency response information as necessary.

# Accessibility in Action

## Training

We have trained employees, volunteers, agents, contractors, and others who deal with the public or act on our behalf on the provisions required by the Accessibility Standards for Customer Service:

- Accessibility for Ontarians with Disabilities Act, 2005
- Accessibility Standards for Customer Service, Ontario Regulation 429/07
- Instructions on how to interact and communicate with customers with various types of disabilities
- Instructions on how to interact with people with disabilities who: use assistive devices; require the assistance of a guide dog, service animal or service dog; or require the use of a support person.
- Instructions on how to use equipment or devices available at/on our premises or that may help customers with disabilities.
- Instructions on what to do if a customer with a disability is having difficulty accessing our services
- WalterFedy employees understand their responsibilities to provide accessible services that consider the needs of clients with disabilities.

We keep records of training that include the dates training was provided and the number of employees who attended.

## Employment

- We have developed a process for welcoming new employees with disabilities and creating an accommodation plan and personalized emergency response plan, including performance management.
- Our new hire orientation program includes a section on accessibility, which covers information about the Ontarians with Disabilities Act and its different sections.
- Potential employees are notified of the availability of accommodation in our job postings and interview invitations.
- We continue to ensure there are documented individual accommodation plans for each current employee with a disability.

## Design of Public Spaces

Our Hamilton office was designed and constructed as per Ontario Building Code's standards for accessibility.

## Customer Service

- We developed a policy that complies with the Accessibility Standard for Customer Service.
- We allow customers to use their own personal assistive devices when accessing our services.
- We developed other measures to enable customers to access our services in the event that the assistive device presents a safety concern or where accessibility might be an issue.
- We allow customers with disabilities to be accompanied by a guide dog, service dog and/or service animal unless prohibited by law.
- We allow customers who are accompanied by a support person to bring that person with them while accessing goods and services.

- We provide notice of service disruptions that include the reason, anticipated duration and alternative options to access our services.
- We have documented, in writing, all of our policies for providing compliant customer service and employee standards.
- When requested, we provide documents in a format that takes into consideration the customer's disability.
- We keep records of employee and client feedback regarding AODA policy and procedures.

## Information and Communications

We have taken the following steps to make all new websites and content conform with WCAG 2.0, Level A, to the extent practicable:

- All of our websites are assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A.
- All of our web content is assessed and evaluated for accessibility conformance.
- We continue to notify the public about the availability of accessible formats and communication supports.

We have taken the following steps to make all websites and content conform to WCAG 2.0, Level AA, to the extent practicable:

- Identified accessibility features and functions during planning stages
- Identified all accessibility non-compliance during the testing phase.
- Conducted accessibility reviews of all websites prior to launch.

We have taken the following steps to ensure existing feedback processes are accessible to people with disabilities upon request, to the extent practicable:

- Our customer feedback processes allow for multiple types of communication such as email, telephone, or regular mail.
- All accessibility-related inquiries are forwarded to Human Resources for review and resolution.

We have taken the following steps to make sure all publicly available information is made accessible upon request, to the extent practicable:

- All employees will receive training on the AODA Integrated Accessibility Standards Regulation.
- Accessible formats and communication supports will be produced upon request in a timely manner with no additional cost charged.

Employees and clients with disabilities can provide feedback via multiple types of communication.

Our employees and clients with disabilities have equal access to company information through communication supports, alternate formats, and accessible websites.



# Overview of Objectives: 2021-2026 Plan

## Training

**Objective:** To educate all employees and maintain an understanding of AODA standards

### Planned Actions

- Train employees, volunteers, agents, contractors and others who deal with the public or act on our behalf on the provisions required by IASR and on the provisions required by us and develop policies, procedures, and practices surrounding the legislation.
- Train those who are involved in the development and approval of customer service policies, practices and procedures on the required provisions.
- Train on developing individual accommodation plans for employees with disabilities.
- Institute a refresher training cycle at least every three years, or as changes occur, to ensure knowledge remains current.
- Provide accessibility training to leaders.
- Provide AODA training for digital content creators and engage them in the annual audit process.

### Outcomes

- All employees and volunteers will have current AODA knowledge.
- Those who are involved in the development and approval of customer service policies, practices, and procedures will be trained on the required provisions.
- Those who develop individual accommodation plans for employees with disabilities will be trained on the required provisions.
- Leaders will have received accessibility training.

## Information and Communications

**Objective:** To continue our commitment to making information and communications accessible to people of all abilities.

### Planned Actions

- Conduct accessibility reviews of all websites and pages prior to launch.
- Outline roles and responsibilities in web content and development policies regarding content compliance for new Intranet sites.
- Conduct web accessibility audits on all existing websites and web content to determine if AODA requirements are met and develop a remediation plan if the content does not conform to the requirements.
- Continue to review the AODA policy annually.
- Continue making the AODA policy available in an accessible format for client requests.
- Continue to use the accessible feedback and request mechanism as a means for enabling people with disabilities to request accessible formats or communication supports.
- Add an Accessibility section on the company's Intranet site, to allow employees to easily access accessibility information

### Outcomes

- All websites will be AODA compliant.
- The AODA policy will be up to date.
- Continue to ensure that our documents are available in an accessible format.
- Employees will have easy access to accessibility information.

## Employment

**Objective:** To ensure employment processes are inclusive and accommodating for all applicants.

### Planned Actions

- Establish a process to consult with any applicant who requests an accommodation in a manner that considers the applicant's disability.
- Review existing policies and procedures and if necessary, augment processes for people with disabilities on the development of accommodation plans and return to work processes.
- Continue addressing barriers to recruitment.
- Continue to accommodate employees by providing individual accommodation plans and providing information in an accessible format, as needed.

### Outcomes

- Our policies and procedures will support the removal of any barriers to recruitment for candidates and employees with disabilities.

## **Additional Information**

For more information on this accessibility plan, please contact Human Resources:

**Phone:** 519-576-2150

**Email:** [hr@walterfedy.com](mailto:hr@walterfedy.com)

Alternative accessible formats of this document are available upon request from Human Resources.

# Glossary of Terms

## Accessible Formats

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

## Assistive Device

An assistive device is a technical aid, communication device or other instrument used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that customers bring with them such as a wheelchair, walker or a personal oxygen tank, that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

## Communication Supports

Communication supports include, but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

## Conversion Ready

An electronic or digital format that facilitates conversion into an acceptable format.

## Disability

The term Disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, refers to:

- 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 coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal, or on a wheelchair or other remedial appliance or device;
- a condition of mental impairment or a developmental disability;
- a learning disability, or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- a mental disorder;
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

## Guide Dog

A guide dog is 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

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

## Internet Website

Internet Website refers to a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

## Intranet Website

Intranet Website refers to an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization and includes extranet websites.

## Redeployment

Redeployment is the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

## Service Animal

As reflected in Ontario Regulation 429/07, an animal is a service animal for a person with a disability if:

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
- if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

## Service Dog

As reflected in Health Protection and Promotion Act, Ontario Regulation 562, a dog other than a guide dog for the blind is a service dog if:

- it is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- if the person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

## Support Person

As reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

## Web Content Accessibility Guidelines

This refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0."