

Accessibility - Statement of Commitment

Navacord is committed to excellence in serving all customers, employees, job applicants, suppliers, and any visitors, including people with disabilities, and will carry out its functions and responsibilities in an appropriate manner to accommodate such individuals.

Navacord is also dedicated to giving people with disabilities the same opportunity to access our goods and services, and allowing them to benefit from the same services, in the same place, and in a similar way as other customers.

Navacord will strive to ensure that its policies, practices and procedures are consistent with the following core principles as outlined in the AODA.

Dignity – Goods and services are provided in a manner that is respectful to persons with a disability and does not diminish the person’s importance.

Independence – Accommodating a person’s disability means respecting their right to do for themselves and to choose the way they wish to receive goods and services.

Integration – Wherever possible, services will be provided in a manner that enables people with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. This may require alternative formats and flexible approaches. It means inclusiveness and full participation. This is a fundamental human right.

Equal Opportunity – Service is provided to persons with disabilities in a way that their opportunity to access goods and services is equal to that given to others.

More Information

Please contact your Human Resources Department.

INTEGRATED ACCESSIBILITY STANDARDS POLICY

The following policy has been established by Navacord to govern the provision of services with Regulation 191/11, “Integrated Accessibility Standards” (“Regulation”) under the *Accessibility for Ontarians with Disabilities Act, 2005*.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

Navacord is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

Commitment

Navacord 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 persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

This policy will be implemented in accordance with the time frames established by the Regulation.

Accessibility Plan

Navacord will develop, maintain and document an Accessibility Plan outlining the company’s strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company’s website. Upon request, Navacord will provide a copy of the Accessibility Plan in an accessible format.

Training Employees and Volunteers

Navacord will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to persons with disabilities, to:

- all its employees and volunteers;
- all persons who participate in developing Navacord’s policies; and,
- all other persons who provide goods, services or facilities on behalf of the company



The training will be appropriate to the duties of the employees, volunteers and other persons.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained within 60 days of the start of their employment.

Navacord will keep a record of the training it provides.

INFORMATION AND COMMUNICATIONS STANDARDS

Feedback

Navacord will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

Accessible Formats and Communication Supports

Upon request, Navacord will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

Navacord will consult with the person making the request in determining the suitability of an accessible format or communication support.

Navacord will also notify the public about the availability of accessible formats and communication supports.

Accessible Websites and Web Content

Navacord will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

EMPLOYMENT STANDARDS

Recruitment

Navacord will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

Recruitment, Assessment or Selection Process



Navacord will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, Navacord will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Notice to Successful Applicants

When making offers of employment, Navacord will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Navacord will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, Navacord will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, Navacord will consult with the employee making the request.

Workplace Emergency Response Information

Navacord will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Navacord is aware of the need for accommodation due to the employee's disability. Navacord will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, Navacord will, with the consent of the employee, provide the workplace emergency response information to the person designated by Navacord to provide assistance to the employee.



Navacord will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

Documented Individual Accommodation Plans

Navacord will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

Return to Work Process

Navacord maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps Navacord will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (i.e. the *Workplace Safety Insurance Act, 1997*).

Performance Management, Career Development and Advancement & Redeployment

Navacord will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.



NAVACORD

Questions about this policy

This policy has been developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation will be provided by:

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AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Provision of Goods and Services

1 POLICY

- 1.1 The mission of Navacord is to be the broker of choice for quality conscious insurance buyers who appreciate thoroughly planned, cost effective strategies to risk management, to help them make smart insurance decisions and enhance their opportunities.
- 1.2 Our commitment in fulfilling our mission is to strive at all times to provide our goods and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place, and in a similar way as other customers.
- 1.3 Reasonable efforts will be made to ensure that:
 - Persons with disabilities are provided equal opportunity to obtain, use and benefit from the Navacord goods and services;
 - Goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
 - The goods and services provided to persons with disabilities are integrated with the provision to others unless an alternative measure is necessary to allow a person with a disability to benefit: the alternative measure may be temporary or permanent;
 - Communications with a person with a disability are conducted in a manner that takes the person's disability into account;
 - Persons with disabilities may use assistive devices, service animals and support persons as is necessary to access Navacord goods and services, unless superseded by other legislation.
- 1.4 The requirements of the Integrated Accessibility Standards Regulation include the following four items:
 - Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation;
 - Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
 - Training; and
 - Other specific requirements under the Information and Communications, Employment transportation Standards and Public Spaces.

2 PURPOSE

- 2.1 This policy and its procedures address the accessibility requirements of Regulation 429/07 Accessibility Standards for Customer Service under the Accessibility for Ontarians with Disabilities Act.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager and/or immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

- 5.1 "Assistive Devices" are auxiliary aids such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs or hearing aids).
- 5.2 "Disability", as per the Ontario Human Rights Code, means:
- 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 a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
 - A mental disorder; or
 - An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act.
- 5.3 "Employees" means every person who deals with members of the public or other third parties on behalf of Navacord, whether the person does so as an employee, agent, volunteer or otherwise.
- 5.4 "Persons with Disabilities" are individuals who have a disability as defined under the Ontario Human Rights Code (and above).
- 5.5 "Service Animals" are animals individually trained to do work or perform tasks for the benefit of a person with a disability.
- 5.6 "Support Persons" are any persons, whether a paid professional, volunteer, family member, or friend, who accompany a person with a disability in order to help with communications, personal care or medical needs, or with access to goods or services.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

Providing goods and services to people with disabilities Navacord is committed to excellence in serving all customers including people with disabilities and we will carry out our functions and responsibilities in the following areas:

7.1 Communication

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

7.2 Telephone services

We are committed to providing fully accessible telephone service to our customers. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by mail or in person if telephone communication is not suitable to their communication needs or is not available.

7.3 Assistive devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services. Once we receive a request from a client, we will ensure that our staff are trained and familiar with various assistive devices that may requested by customers with disabilities while accessing our goods or services.

7.4 Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices will be provided in the following formats upon request: hard copy, large print, email, etc., in which provider will provide invoices. We will answer any questions customers may have about the content of the invoice in person, by telephone or email.

7.5 Use of service animals and support persons

We are committed to welcoming people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. We will also ensure that all staff, volunteers and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter Navacord's premises with his or her support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises.

7.6 Notice of temporary disruption

Navacord will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. The notice will be placed at all public entrances and service counters on our premises.

7.7 Training for staff

Navacord will provide training to all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures.

All employees of Navacord and affiliate companies will receive online training to accommodate.

This training will be provided within one month of an employee being hired with Navacord. Training will include the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of the customer service standard
- How to interact and communicate with people with various types of disabilities
- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- What to do if a person with a disability is having difficulty in accessing Navacord's goods and services

Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

7.8 Feedback process

The ultimate goal of Navacord is to meet and surpass customer expectations, while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are welcomed and appreciated.

Feedback regarding the way Navacord provides goods and services to people with disabilities can be made by email, in person, or on the phone. Alternative methods to provide feedback may be made available, upon request. All feedback will be directed to the Human Resources Director. Customers can expect to hear back in 10 business days.

Complaints will be addressed according to complaint categories already established in our company's complaint management procedures.

Upon receipt, the Human Resources Director will investigate the matter with the appropriate personnel and provide a written response within thirty (30) days.

7.9 Modifications to this or other policies

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.

Any policy of Navacord that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

7.10 Questions about this policy:

This policy exists to achieve service excellence to customers with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to your Human Resources Department.

A copy of this policy is available upon request by contacting your Human Resources Department. In addition, a copy of this policy is available on the company's intranet site, ADP. The policy document will be provided in a format that takes into account the person's disability.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Use of Assistive Devices

1. POLICY

- 1.1 Navacord will welcome all customers and the broader public to our facilities by committing our staff and volunteers to providing our goods and services that respect the independence and dignity of people with disabilities. Such access to goods and services incorporate measures that include but are not limited to the use of assistive devices.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure that each facility that is open to the public will, as applicable, post information in the front office or reception area or entrance that indicates the availability of assistive devices and encourages potential users to seek support from staff and volunteers as they require it.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 Managers, supervisors, department heads will ensure that staff are trained to support customers and the broader public who may use assistive devices while accessing our facilities so that we can provide our goods and services.
- 4.2 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.

5 DEFINITIONS

"Assistive devices" are any devices used by persons with disabilities to help with daily living and tasks such as auxiliary aids, communication aids, cognition aids, personal mobility aids and medical aids. Assistive devices include a range of products such as wheelchairs, walkers, white canes, crutches, oxygen tanks, hearing aids and other electronic communication devices.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 Training is focused on how to interact with people using assistive devices rather than on the technical use of the assistive devices.
- 7.2 Assistive devices carried by persons with disabilities: Navacord facilities that provide goods and services respect the independence of people with disabilities and offer services that include assistive devices.

7.3 Each of Navacord's facilities that is open to the public welcomes the use of assistive devices and encourages users to seek support from staff and volunteers as they require it.

7.4 Assistive devices/services made available by Navacord:

Navacord will provide services and access to goods to people with disabilities. These could include wheelchairs and lift accessibility. This could also include assistive services such as language interpretation, oral interpretation, real-time captioning and/or alternative service methods such as assistance of a staff person to complete a transaction.

7.6 Employees must not touch or move a person's assistive device without the person's permission. If you do have their permission, do not move the device out of the user's reach.

7.7 Navacord employees are expected to practice consideration and safety. Do not leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors.

7.8 Let the person know about accessible features in the immediate environment such as automatic doors, accessible washrooms or change room

8 RECORD KEEPING

Navacord will maintain accurate records of training delivered to our staff and volunteers and make these records available for inspection as may be required.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Use of Service Animals

1 POLICY

- 1.1 Navacord welcomes people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public. If a service animal is excluded by law from Navacord premises, we will ensure that alternative means are available to enable the person with a disability to access our goods and services.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities who are accompanied by a service animal are treated accordingly.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers, immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

- 5.1 "Service animal" is an animal that a person with a disability uses for support. Such use is either readily apparent or is supported by a letter from a physician or nurse.

It may be readily apparent that an animal is a service animal when its appearance or behaviour (e.g., wearing a harness or saddle bags) identifies it as a service animal or the owner has a certificate or identification card from a service animal training school. It may also be apparent if a person is using the animal to assist him or her, e.g., opening doors or retrieving items.

Service animals offer independence and security to many people with various disabilities. Some laws generally prohibit animals in certain areas, such as food preparation areas. However, service animals are permitted in most public situations. For example, a service animal would not be allowed in a restaurant kitchen, but is allowed in the restaurant itself.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07 Health Protection and Promotion Act, Ontario Regulation 562, sections 59 & 60 Food Safety and Quality Act, 2001

7 PROCEDURES

- 7.1 Unless otherwise excluded by law, the customer service standard requires that a person is permitted to be accompanied by his or her guide dog or other service animal in the areas that are open to the public or third parties. As such, Navacord employees should allow persons with disabilities to be accompanied by their guide dog or service animal unless the animal is excluded by law.
- 7.2 In the event that a law excludes a service animal, the reason why the animal is excluded should be explained to the individual, and other reasonable arrangements to provide goods and services should be explored with the assistance of the person with the disability.
- 7.3 Service animals are non-participants and therefore whenever possible should be granted free admission to the goods and/or services being accessed by the person with a disability they are accompanying.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Use of Support Persons

1 POLICY

- 1.1 Navacord is committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on our premises. In the event that a fee is charged in relation to a support person's presence on Navacord premises or to attend a Navacord-sponsored event, a support person will be considered a non-participant and the fee will be waived..

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities who are accompanied by a support person are treated accordingly.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

"Support persons" assist people with disabilities in a variety of ways, by aiding with communication such as an intervenor, sign language interpreter or a personal support worker providing physical assistance. The support person could be a paid professional, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 A person with a disability who is accompanied by a support person will be welcomed at Navacord premises and events with his or her support person.

- 7.2 Access will be in accordance with normal security procedures.
- 7.3 It is important to remember to direct all communications directly to the individual and not the support person.
- 7.4 In some cases a support person may have to agree to rules or requirements that are specific to the kinds of goods or services provided. For example, where confidentiality is important because of the kinds of information discussed, you may require the support person to sign a confidentiality agreement prior to the disclosure of information. A copy of the signed consent should be retained at the Navacord office.
- 7.5 It may also be necessary to first obtain consent of disclosure from the individual prior to discussing or releasing confidential personal information in the presence of a support person. If the individual uses a different support person for subsequent confidential meetings, a new signed consent may be required. Please refer to the confidentiality consent form for that purpose.

STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Disruption of Services

1 POLICY

- 1.1 Navacord will make reasonable efforts to provide notice in the event of a planned or unexpected disruption in the facilities or services where they have control over such facilities or services. This notice will include information about the reasons for the disruption, its anticipated duration and a description of alternative facilities or services, if available. Navacord will provide notice by posting information in visible places on our premises or on the Navacord website or by any other method that may be reasonable under the circumstances.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure persons with disabilities know when there is a temporary disruption of service.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors, and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 If a disruption in service is planned and expected, Navacord should provide notice as far in advance of the disruption as possible as individuals may require considerable time to make alternative arrangements.

- 7.2 If a disruption is unexpected, Navacord should provide notice as soon as possible after the disruption has been identified.
- 7.3 The notice of disruption should include information about the service that is disrupted, reason(s) for the disruption, the anticipated duration and a description of alternative facilities, services or alternate mechanisms to access the good/services.
- 7.4 Depending on the nature of the disruption, notice may be given by posting the information at a conspicuous place (e.g., on or directly to the side of an elevator door or a washroom door) or in Navacord's facilities or venue area. Other options that may be use include: placing a message on voicemail, posting on the Navacord website or through direct communication with users of the services in accordance with Navacord's practices.
- 7.5 Generally, disruptions to or of an organization's services, such as during a power outage, do not require this special notice. However, if the disruption has a significant impact on people with disabilities, Navacord should provide the notice of disruption in an appropriate manner as soon as possible.
- 7.6 From time to time Navacord may not have direct control over facilities or services (e.g., one office within a building leased by many businesses). In these circumstances it is recommended that Navacord endeavour to work with the organization that does have control over the facility/service in order to ensure a notice of temporary disruption is posted.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Customer Feedback

1 POLICY

- 1.1 Navacord welcomes feedback as it encourages continuous service improvements. Feedback from a member of the public about the delivery of goods and services to persons with disabilities may be given by telephone, in writing, in electronic format or through other methods.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to implement a process for individuals to provide feedback on how Navacord provides goods and services to people with disabilities, respond to any feedback and take action on any complaints/suggestions, as required by the Accessibility Standards for Customer Service. Feedback from our customers gives the Navacord opportunities to learn, improve and acknowledge performance.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of the managers and/or immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each managers and/or immediate supervisors and/or department heads is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005

Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 Please use any of the following feedback methods: Call Navacord at 416.259.4625, email us at careers@Navacord.com or visit/write us at 2375 Skymark Avenue, Mississauga, ON L4W 4Y6, attention Human Resources.
- 7.2 Feedback can be communicated to Navacord via telephone, email, mail, verbally in person or any other means that effectively accommodates the person with the disability.
- 7.3 If an individual indicates that he or she would like a response, the Navacord is responsible for addressing that individual's comments/suggestions in a timely fashion. In some cases, comments may be very specific to one situation. In other cases, comments may be broader and provide an opportunity for enhancing Navacord's policies and practices.
- 7.4 Record feedback received and actions taken.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Training

1 POLICY

- 1.1 Navacord will provide training to all employees, volunteers and others who deal with the public on their behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures. Training will be provided as soon as practicable after an individual assumes responsibilities related to the public and will include the following:
- The purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of the Accessibility Standards for Customer Service;
 - Information regarding Navacord policies, practices and procedures relating to the customer service standards;
 - How to interact and communicate with people with various types of disabilities; What to do if a person with a particular type of disability is having difficulty accessing your goods or services;
 - How to interact with people with disabilities who use an assistive device, service animal or support person;
 - How to use the equipment or assistive devices that may be available at the Navacord. The amount and format of training will be tailored to suit each person's interactions with the public or his/her involvement in the development of policies, procedures and practices pertaining to the provision of goods and services.
 - Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is that Navacord is required to provide training to all employees, volunteers, contractors, and others who deal with the public on Navacord's behalf. Navacord must also train all others who are involved in the development of policies, practices and procedures.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

For the purpose of this policy, employees encompass all of the groups indicated in section 2.01.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005

Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

7.1 Training includes the following elements:

- Review of the purposes of the Accessibility for Ontarians with Disabilities Act and the requirements of the customer service standard;
- How to interact and communicate with people with various types of disabilities;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use an assistive device, service animal or support person;
- How to use the equipment or assistive devices available at Navacord, if applicable;
- What to do if a person with a particular type of disability is having difficulty accessing your goods or services;
- Information regarding Navacord's policies, practices and procedures relating to the customer service standards.

7.2 Timing of training: All current employees who work with the public should be trained immediately.

7.3 All new employees who work with the public should be trained as soon as practicable. It is recommended that training take place within 60 days after commencing employment.

7.4 Current employees who assume new job responsibilities that include interaction with the public should be trained as soon as practicable. It is recommended that training take place within 60 days after commencing these new job responsibilities.

7.5 Employees should also be trained on an ongoing basis when changes are made to the policies, practices and procedures.

7.6 Methods of training: All Navacord staff should be provided the mandatory training as follows: e- learning training module

7.7 Keep a copy of the training certificate received at the end of the training in the employee's file. Also record when and how the training was done for each employee.

7.8 Part of training includes reviewing all Navacord policies, procedures and practices under the customer service standard (e.g., customer service, assistive devices, communication, service animal, support person, disruption of service, feedback process, etc.)

7.9 The training may not be exactly the same for all staff and need not be delivered in the same manner as long as it meets the requirements as outlined above.

8 RECORD KEEPING

8.1 Navacord is required by the customer service regulation to keep a record of all training provided under the AODA and Regulation 429/07. The training records to be maintained include, the date on which training was provided, the type of training and participants.

AODA STATEMENT of POLICY and PROCEDURE

Customer Service Policy: Availability and Format of Documentation

1 POLICY

- 1.1 Documents required by the Accessibility Standards for Customer Service are available upon request. When providing a document to a person with a disability, Navacord will work with the individual to determine options in order to provide the document or the information contained in the document in a format that takes the person's disability into account.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is that, per regulations, Navacord is required to post a notice that documents required by the customer service standard are available upon request and in a format that takes a person's disability into account.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor, and department head is responsible to ensure all employees are trained under the customer service standard and these policy, practices and procedure.

5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

- 7.1 Navacord has a template that includes sample text of notification of availability of documentation. It is recommended that the notification be placed on Navacord website and in a conspicuous place in Navacord's facilities

- 7.2 In determining a suitable format that takes the individual's disability into account, it is recommended that Navacord work with the individual to determine options in order to provide the document(s) or the information contained in the document(s) in a format that is reasonable and takes the person's disability into account.

- 7.3 More information about alternative formats is available in our policy communicating with persons with disabilities.

- 7.4 Note that the release of information may be subject to applicable privacy legislation.

AODA STATEMENT of POLICY and PROCEDURE

Information and Communications Policy

1 POLICY

- 1.1 We are committed to communicating with people with disabilities in ways that take into account their disability and in keeping with the principles of dignity, independence, integration and equal opportunity.
- 1.2 This policy provides guidance in considering how to improve communication with people with a disability through general communications, involvement of people with a disability in consultation, or in meetings, during a transaction and producing publications in accessible formats.
- 1.3 This policy applies to all Navacord communications with the public, including in relation to consultation, and the development of pamphlets, flyers, letters, memos, emails, websites, brochures, invoices, papers and reports, among others.
- 1.4 All oral and written communication should seek to be inclusive of and positive toward people with a disability. Avoid phrases that demean people with disabilities (such as unfit, defective or incapacitated), avoid words such as "handicapped," "crippled" and "wheelchair-bound". Do not refer to people by categories such as "the blind" or "the disabled".

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to ensure that persons with disabilities have communication access that is effective as that provided to persons without disabilities. To be equally effective, an aid, benefit or service need not produce the identical result or level of achievement for disabled and non-disabled persons; it must afford the person to whom it is provided equal opportunity to achieve equal results, gain equal benefit and reach the same level of achievement.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and/or department heads to ensure that all employees follow the guidelines set out in this policy.
 - 4.2 Each manager, immediate supervisor and/or department head is responsible to ensure all employees are trained under Accessibility Standards for Customer Service and this policy, practices and procedure.
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5 DEFINITIONS

None

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Accessibility Standards for Customer Service, Ontario Regulation 429/07

7 PROCEDURES

7.1 Terminology: the terminology we use can influence the way we see people and may unintentionally create a negative perception. The words we use can be very powerful. However unintentional, many words used to describe the nature of a disability can be demeaning and disrespectful. Please refer to the terminology chart to assist you in making your communication with or without people with disabilities more successful.

7.2 The words "disability" and "disabled" are more appropriate than "handicap" or "handicapped."

7.3 Remember to put people first. It is preferable to say "person with a disability" instead of "disabled person."

7.4 Considering an individual's disability in communication: A key aspect of communication is taking into consideration the specific needs of an individual. Employees may need to utilize a variety of different techniques to best interact with a person with a disability in order to effectively provide goods and services to that individual.

7.5 To assist people with disabilities access our services, employees should utilize the following general guidelines:

7.6 Treat people with disabilities with the same respect and consideration you offer everyone else.

7.7 If you're not sure what to do, ask the individual, "May I help you?" Ask before you offer to help; don't just jump in. People often have their own way of doing things. Individuals with disabilities know if they need help and how you can provide it.

7.8 If you don't know someone, or if you are unfamiliar with the disability, it's better to wait until the individual describes his or her situation to you, rather than to make your own assumptions. Many types of disabilities have similar characteristics and your assumptions may be wrong. Some disabilities are not visible.

Take the time to get to know the individual's needs. Speak normally, clearly and directly. Speak directly to a person with a disability, not to their interpreter or someone who is with them.

Be patient; give the individual time to explain him or herself.

7.9 Utilize the materials provided in the Overview of the policy manual to assist you with individual/specific situations, techniques, best practices and alternative communication methods to assist with the provision of goods and services based on the needs of the individual.

7.10 We will give careful consideration to whether consultations, meetings, and transaction methods are inclusive of people with disabilities.

- 7.11 When organizing meetings, we will make attempts to use facilities that cater for people with disability; e.g., ramps, handrails and lifts for people with mobility disabilities, inductive loop or radio systems to assist the hearing impaired. We will consider whether it is appropriate to hire an interpreter to assist in presentations at meetings. Where such facilities are available, they should be advertised as part of the information about the location of the meeting.
- 7.12 Emergency procedures, plans and safety information will be provided in accessible format, or with appropriate communication supports, upon request.
- 7.13 Navacord will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.
- 7.14 When organizing consultation meetings, consider the environment available for any person with a disability attending the meeting; e.g., physical access to the building and meeting room, access to toilets, lighting in the room, external noise.
- 7.15 Publications: When preparing material intended to be distributed to the public, we will consider the format of the material and its accessibility to the target audience. In particular, we will consider whether alternative formats are required in order to facilitate access by a person with a disability.
- 7.16 Excessive cost can be avoided by carefully targeting the audience. Options for making accessible formats available may include:
- Distributing standard formats, and developing and providing alternative formats only upon request.
 - Providing a pamphlet or booklet in accessible format, and supplementary documents upon request.
 - Advertising the availability of certain alternative formats. Where only standard formats are distributed, consideration should be given to advertising the availability of alternative formats upon request.

Reception and publications staff should be made aware of the availability of alternative formats, and particular formats Navacord is willing to provide upon request.

- 7.17 One or more of the following formats may be appropriate for development to improve accessibility:

Internet: The Internet is a highly suitable medium for many people with hearing, vision, and mobility impairments. To make the publication most compatible to software that assists people with a disability, it should be posted on the Internet in HTML or ASCII format.

CD or DVD: Providing information in a portable electronic format may be suitable for people with hearing, vision, mobility and/or manipulatory impairments. The publication should be converted to ASCII format to make it most compatible with accessibility computer software.

Audio cassette, digital audio file, podcast: Audio is used by a wide range of people although it is often targeted to people with vision impairment. These formats are relatively easy and cost-effective to produce and post.

Braille: This format is used by people with severe vision impairment who have learned the Braille alphabet.

Large and illustrated print: Large print is mainly targeted to those with low vision. It refers to any printed matter that uses a font that is 14 point or larger. Illustrated print is designed to provide a quick visual outline of a message. It is often preferred by people with an intellectual disability, people with some visual impairment and can also assist people from culturally and linguistically diverse backgrounds.

Easy English: This format is useful if specifically providing information to people with intellectual disabilities or limited reading skills. The information is summarized and expressed in short sentences that each conveys a single idea or concept.

- 7.18 Provide information about events and services in a variety of media (for example, publicize telephone and fax numbers, provide print information and radio notices).
- 7.19 Provide sufficient notice of events to ensure there is time to arrange transport or other requirements.
- 7.20 Navacord will provide targeted information for people with disabilities, their families, and support person, and service providers, for no additional charge.
- 7.21 If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Navacord will ensure that the individual who made the request is provided with an explanation and a summary of the information.

AODA STATEMENT of POLICY and PROCEDURE

Employment Standard Policy

1 POLICY

- 1.1 Navacord is committed to implementing fair and accessible employment practices throughout its entire employment cycle. The policy will be reviewed once every 5 years to ensure that is reflective of Navacord's current practices, as well as, legislative requirements.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Employment Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005. Navacord will ensure that employees and the public are aware of the availability of accommodations for applicants with disabilities.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

None.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards, Ontario Regulation 191/11

7 PROCEDURES

- 7.1 Internal and external job postings will provide information to applicants regarding the availability of accommodation, and how to request and access this accommodation.
- 7.2 If a selected applicant requests accommodation, Navacord will consult with the applicant and will arrange for suitable accommodation that takes into account the applicant's disability.

- 7.3 Employment tests that occur during the recruitment process will be made available to the applicant in an accessible format, that takes into account the applicant's disability, upon request.
- 7.4 Successful applicants, who requested accommodation, will be provided with existing policies in an accessible format, that takes into account the employee's disability.
- 7.5 Navacord will take into account an individual's accommodation needs or Individual Accommodation Plans when providing career development information, performance reviews and implementing redeployment procedures.
- 7.6 Navacord will generate individual workplace emergency response procedures for employees with disabilities, that take into account the unique challenges created by the individual's disability, the physical nature of the workplace, and will be created in consultation with the employee.
- 7.7 Navacord will generate a process for developing Individual Accommodation Plans and return to work plans for employees who have been absent due to a disability.

The Individual Accommodation Plan will include the following:

- Consultation with the employee in the development of the IAP
- Assessment on an individual basis;
- Navacord may request an evaluation by a medical or other expert, at our expense, to assist with determining how accommodation can be achieved;
- The employee may request that a representative from the workplace be present during the consultation;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- If denied, the reasons for denial will be provided to the employee
- The IAP will be provided in an accessible format;
- Identification of any other accommodation that is to be provided.

AODA STATEMENT of POLICY and PROCEDURE

IASR Design of Public Spaces Policy

1 POLICY

- 1.1 Navacord shall incorporate accessibility into public spaces on its premises that are newly constructed or redeveloped, on or after January 1, 2017. Navacord will ensure that barriers pertaining to buildings and public spaces are removed.
- 1.2 The policy will be reviewed once every 5 years to ensure that is reflective of Navacord's current practices, as well as, legislative requirements. Navacord shall ensure that our multi-year accessibility plan addresses procedures for temporary disruption and maintenance procedures for accessible elements in public spaces.

2 PURPOSE

- 2.1 The purpose of this Statement of Policy and Procedure is to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 for the Design of Public Spaces Standard set forth under the Accessibility for Ontarians with Disabilities Act, 2005.

3 SCOPE

- 3.1 This policy applies to all employees and all facilities of Navacord in Ontario.

4 RESPONSIBILITY

- 4.1 It is the responsibility of managers, immediate supervisors and department heads to ensure that all employees follow the guidelines set out in this policy.
- 4.2 Each manager, immediate supervisor and department head is responsible to ensure all employees are trained under the Accessibility Standards for Customer Service and this policy, practices and procedure.

5 DEFINITIONS

- 5.1 Exterior Paths of Travel – Refers to sidewalks and walkways designed and constructed for pedestrian travel and intended to provide a functional route from Point A to Point B, rather than a recreational experience.
- 5.2 Redeveloped – A planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURE

Accessibility for Ontarians with Disabilities Act, 2005
Integrated Accessibility Standards, Ontario Regulation 191/11

7 PROCEDURES

- 7.1 Navacord is committed to ensuring that any newly constructed and/or redeveloped outdoor public use eating areas have a minimum 20% of tables that are made accessible in accordance with the Integrated Accessibility Standards, section 80.17.
- 7.2 To ensure the health and safety of all pedestrians, any newly constructed or redeveloped exterior paths of travel will meet, and where possible exceed, the technical requirements of the Integrated Accessibility Standards, section 80.23, and where applicable, sections 80.24 – 80.28.
- 7.3 Navacord will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities:
Type A – Parking space with a minimum width of 3.4 m; and
Type B – Standard parking space with a minimum width of 2.4 mm.
Access aisles will be provided for all accessible parking spaces and will meet the requirements of the Integrated Accessibility Standards, section 80.35.
- 7.4 Navacord will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the Integrated Accessibility Standards, section 80.36.
- 7.5 When constructing or replacing any service counters, Navacord will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, section 80.41.
- 7.6 When constructing or redeveloping an existing waiting area, JDIMI Inc. will ensure that a minimum of 3% of the seating is made accessible. JDIMI Inc. will ensure that there will be at least one (1) accessible seat.

ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT, 2005
INTEGRATED ACCESSIBILITY STANDARDS – Multi Year Plan
Part I – GENERAL REQUIREMENTS

Section	Initiative	Description	Action	Status	Compliance Date
3	Establishment of Accessibility Policies	3.(1) Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation.	HR to review policy Jan 1, every year	Complete	January 1, 2014
4	Accessibility Plans	<p>4.(1) Large organizations shall,</p> <p>a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation;</p> <p>b) post the accessibility plan on website, and provide the plan in an accessible format upon request; and</p> <p>c) review and update the accessibility plan at least once every five years.</p>	<p>H&S Committee to Identify barriers during monthly inspections</p> <p>complete</p> <p>HR will review Jan 1, every year</p>	Complete	<p>January 1, 2014</p> <p>November 18, 2014</p>



7	Training	7.(1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities to, (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services or facilities on behalf of the organization.	Training has been designed, sr. mgt.; first line mgrs. and one for all employees via E-learning	Ongoing	January 1, 2015
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PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	11.(1) Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.	Conduct a review of all feedback processes across the organization (internally and externally). Consult with all functional areas to make sure all feedback processes are captured. Determine what accessible formats and communication supports we will provide upon request	Complete	January 1, 2015



			Ensure staff and management are aware of the need to accommodate upon request (included in training)		
12	Accessible Formats & Communication Supports	<p>12.(1) Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</p> <p>a) in a timely manner that takes into account the person's accessibility needs due to disability; and</p> <p>b) at a cost that is no more than the regular cost charged to other persons.</p>	<p>Determine what accessible formats and communication supports we will provide to persons with disabilities upon request.</p> <p>Ensure these formats and supports can be provided in a timely manner (within 24 hours)</p> <p>Communicate to staff and management that no <u>additional charge</u> is required (Included in training)</p> <ul style="list-style-type: none">• must be produced within 24 hours of request• ask managers to discuss in team meetings	Ongoing	January 1, 2016



			<p>Advise Reception teams for each location – contact is HR to request accessible formats of documents:</p> <ul style="list-style-type: none">• Mississauga• Port Hope• Cambridge• Collingwood• TIFG• Luso• Iberia• Vieira• Trenton• Belleville• Stirling		
12		<p>12.(2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p>	<p>Communicate to staff and management this requirement</p> <p>Develop protocol for situations where a suitable agreement cannot be made</p>	Ongoing	January 1, 2016
12		<p>12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	<p>Have a sign posted in reception area</p> <p>Post on website</p>	Ongoing	January 1, 2016



13	Emergency Procedures, Plans or Public Safety Info	13.(1) In addition to its obligations under section 12, if an obligated organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.	Health & Safety Committee and Fire Wardens have emergency procedures in place	Complete	January 1, 2012
14	Accessible Websites & Web Content	14.(2) Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section.	Sent Marketing department to webinar on Accessible Websites Sourcing vendors and pricing to develop accessible website Continuously review WCAG guidelines to be informed of changes and updates	Complete Complete Ongoing	January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A. January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than, <ul style="list-style-type: none">• success criteria 1.2.4 Captions (Live)



					<ul style="list-style-type: none"> • success criteria 1.2.5 Audio Descriptions (Pre-recorded).
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PART III – Employment Standard

Section	Initiative	Description	Action	Status	Compliance Date
22	Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Include notice on: Job Descriptions Job Postings Offers of employment	Complete	January 1, 2016
23	Recruitment, Assessment or Selection Process	23.(1) During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.	All applicants who are successful in obtaining a face to face interview must receive an email or meeting request with the following verbiage: “Navacord is committed to excellence in serving all customers, employees, job applicants, suppliers, and any visitors, including people with disabilities, and will carry out its functions and responsibilities in an appropriate manner to	Complete	January 1, 2016



			<p>accommodate such individuals. If you require accommodation or more information, please let us know and we will work with you to meet your needs.”</p> <p>Identify barriers utilizing: Accessible Interviewing Checklist</p>		
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24	Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Put a statement in hire letter	Complete	January 1, 2016
25	Informing Employees of Supports	25.(1) Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	Post policy on Navacord ADP and JDIMI.com Training provided if required All staff emails	Complete	January 1, 2016
25		25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	During orientation period – 60 days	Ongoing	January 1, 2016
25		25.(3) Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.	See 25 (1)	Ongoing	January 1, 2016



26	Accessible Formats & Communication Supports for Employees	<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) information that is generally available to employees in the workplace.</p>	<p>Functional audit of information specific to departments</p> <p>Audit of regular communications</p>	Ongoing	January 1, 2016
26		<p>26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>List what the employee will require – ie. Policy, communication supports that are available (text-to-speech, braille, large print, accessible PDFs, plain language versions, closed captioning</p>	Ongoing	January 1, 2016
27	Workplace Emergency Response Information	<p>27.(1) Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.</p>	<p>Develop a process:</p> <p>Best Practices: Workplace Emergency Response Plan</p> <p>Individual Employee Response Information Form</p> <p>Identification of Potential</p>	Ongoing	January 1, 2012



			Barriers During an Emergency Response		
27		(2) If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.	Part of process with employee's consent	Ongoing	January 1, 2012
27		(3) Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability.	Part of process		January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, (a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.	Part of process		January 1, 2012



28	Documented Individual Accommodation Plans	28.(1) Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.	Process Developed	Ongoing	January 1, 2016
28		28 (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is	Accommodation Process Individual Accommodation Plan		January 1, 2016



		<p>not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p>			
29	Return to Work Process	<p>29.(1) Every employer, other than an employer that is a small organization,</p> <p>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and</p> <p>(b) shall document the process.</p>	Process Developed	Complete	January 1, 2016



29		<p>29. (2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p>	<p>Return to Work Process</p> <p>Return to Work Policy and Interview Guide</p>	Complete	January 1, 2016
29		<p>29. (3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute.</p>			January 1, 2016
30	Performance Management	<p>30.(1) An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p>	<p>Need to keep individual accommodation plan in mind</p>	Ongoing	January 1, 2016



31	Career Development & Advancement	31.(1) An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.	Need to keep individual accommodation plan in mind	Ongoing	January 1, 2016
32	Redeployment	32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.	Need to keep individual accommodation plan in mind	Ongoing	January 1, 2016

URL: <https://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-1>



Accessibility rules for businesses and non-profits

The rules and deadlines businesses and non-profits must follow to meet accessibility standards in Ontario. The rules you need to follow depend on the type and size of your organization. You are exempt if you are self-employed and do not have employees.

How to count your employees

Count all full-time, part-time, seasonal and contract workers. With most employees, you

- pay wages or a salary
- have control over the work assigned
- have a right to control the details of the work

Do not count employees outside Ontario. Do not count volunteers or independent contractors, but you are responsible for ensuring that the services they provide on your behalf follow the rules of Ontario's accessibility standards. You may need to ensure these individuals are trained to meet the requirements.

1. [1-19 employees \(http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-0\)](http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-0)
2. [20-49 employees \(http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-1\)](http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-1)
3. [50+ employees \(http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-2\)](http://www.ontario.ca/page/accessibility-rules-businesses-and-non-profits#section-2)

1-19 employees

By **January 1, 2012**, you need to:

[Provide accessible customer service \(http://www.ontario.ca/page/how-make-customer-service-accessible\)](http://www.ontario.ca/page/how-make-customer-service-accessible)

- train your staff and volunteers to serve customers of all abilities
- welcome service animals and support persons
- create accessible ways for people to provide feedback
- put an accessibility policy in place so employees, volunteers and customers can know what to expect

[Provide accessible emergency and public safety information \(http://www.ontario.ca/page/how-make-information-accessible#section-1\)](http://www.ontario.ca/page/how-make-information-accessible#section-1)

When asked, provide publicly available emergency information, like evacuation plans or brochures, in an accessible format.

Provide accessible emergency information to staff (<http://www.ontario.ca/document/how-provide-emergency-information-accessible-employees>)

When necessary, provide accessible and customized emergency information. You should provide this information as soon as an employee asks for it or when you become aware an employee may need accommodation in an emergency.

By January 1, 2015, you need to:

Create accessibility policies (<http://www.ontario.ca/document/how-create-accessibility-policies>)

- this will help you achieve your accessibility goals
- tell your employees and customers about your policies

Consider accessibility when purchasing or designing self-service kiosks (<http://www.ontario.ca/page/how-make-self-service-kiosks-accessible>)

This includes interactive electronic terminals that people use to pay parking fees, validate tickets, buy groceries and renew licences.

By January 1, 2016, you need to:

Train your staff on Ontario's accessibility laws (<http://www.ontario.ca/page/how-train-your-staff-accessibility>)

Train all your employees and volunteers on the accessibility requirements that apply to their job duties and your organization.

Make it easy for people with disabilities to provide feedback when asked (<http://www.ontario.ca/page/how-make-information-accessible>)

This includes surveys or comment cards.

By January 1, 2017, you need to:

Make your public information accessible when asked (<http://www.ontario.ca/page/how-make-information-accessible>)

Work with the person to figure out how to meet their needs as soon as possible.

Make your employment practices accessible (<https://www.ontario.ca/page/accessible-workplaces>)

This includes how you hire, retain and provide career development opportunities to all your employees.

By January 1, 2018, you need to:

Make new or redeveloped public spaces accessible (<http://www.ontario.ca/page/how-make-public-spaces-accessible>)

This applies to:

- recreational trails and beach access routes
- parking lots
- service counters
- fixed queuing guides
- waiting areas with fixed seating

20-49 employees

By January 1, 2012, you need to:

Provide accessible customer service (<http://www.ontario.ca/page/how-make-customer-service-accessible>)

- train your staff and volunteers to serve customers of all abilities
- keep a written record of the training
- welcome service animals and support persons
- create accessible ways for people to provide feedback
- put an accessibility policy in place, so your employees, volunteers and customers can know what to expect

Provide accessible emergency and public safety information (<http://www.ontario.ca/page/how-make-information-accessible#section-1>)

When asked, provide publicly available emergency information, like evacuation plans or brochures, in an accessible format.

Provide accessible emergency information to staff (<http://www.ontario.ca/document/how-provide-emergency-information-accessible-employees>)

When necessary, provide accessible and customized emergency information. You should provide this information as soon as an employee asks for it or when you become aware an employee may need accommodation in an emergency.

By December 31, 2014, you need to:

File an Accessibility Compliance Report (<http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report>)

By January 1, 2015, you need to:

Create accessibility policies (<http://www.ontario.ca/document/how-create-accessibility-policies>)

- create policies to help you achieve your accessibility goals
- tell your employees and customers about your policies

Consider accessibility when purchasing or designing self-service kiosks (<http://www.ontario.ca/page/how-make-self-service-kiosks-accessible>)

This includes interactive electronic terminals that people use to pay parking fees, validate tickets, buy groceries and renew licences.

By January 1, 2016, you need to:**[Train your staff on Ontario's accessibility laws \(http://www.ontario.ca/page/how-train-your-staff-accessibility\)](http://www.ontario.ca/page/how-train-your-staff-accessibility)**

Train all your employees and volunteers on the accessibility requirements that apply to their job duties and organization.

[Make it easy for people with disabilities to provide feedback when asked \(http://www.ontario.ca/page/how-make-information-accessible\)](http://www.ontario.ca/page/how-make-information-accessible)

This includes surveys or comment cards.

By January 1, 2017, you need to:**[Make your public information accessible when asked \(http://www.ontario.ca/page/how-make-information-accessible\)](http://www.ontario.ca/page/how-make-information-accessible)**

Work with the person to figure out how to meet their needs as soon as possible.

[Make your employment practices accessible \(http://www.ontario.ca/page/accessible-workplaces\)](http://www.ontario.ca/page/accessible-workplaces)

This includes how you hire, retain and provide career development opportunities to all your employees.

By December 31, 2017, you need to:**[File an Accessibility Compliance Report \(http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report\)](http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report)**

By January 1, 2018, you need to:**[Make new or redeveloped public spaces accessible \(http://www.ontario.ca/page/how-make-public-spaces-accessible\)](http://www.ontario.ca/page/how-make-public-spaces-accessible)**

This applies to:

- recreational trails and beach access routes
- parking lots
- service counters
- fixed waiting lines
- waiting areas with fixed seating

By December 31, 2020, you need to:**[File an Accessibility Compliance Report \(http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report\)](http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report)**

By December 31, 2023, you need to:**[File an Accessibility Compliance Report \(http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report\)](http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report)**

50+ employees

By January 1, 2012, you need to:

Provide accessible customer service (<http://www.ontario.ca/page/how-make-customer-service-accessible>)

- train your staff and volunteers to serve customers of all abilities
- keep a written record of the training
- welcome service animals and support persons
- create accessible ways for people to provide feedback
- put an accessibility policy in place so your employees, volunteers and customers can know what to expect

Provide accessible emergency and public safety information (<http://www.ontario.ca/page/how-make-information-accessible#section-1>)

When asked, provide publicly available emergency information, like evacuation plans or brochures, in an accessible format.

Provide accessible emergency information to staff (<http://www.ontario.ca/document/how-provide-emergency-information-accessible-employees>)

When necessary, provide accessible and customized emergency information. You should provide this information as soon as an employee asks for it or when you become aware an employee may need accommodation in an emergency.

By January 1, 2014, you need to:

Create accessibility policies and a multi-year plan (<http://www.ontario.ca/document/how-create-accessibility-plan-and-policy>)

- create policies and a multi-year accessibility plan to help you achieve your accessibility goals
- tell your employees and customers about your policies
- post the multi-year plan on your website in an accessible format

Consider accessibility when purchasing or designing self-service kiosks (<http://www.ontario.ca/page/how-make-self-service-kiosks-accessible>)

This includes interactive electronic terminals that people use to pay parking fees, validate tickets, buy groceries and renew licences.

Make websites accessible (<http://www.ontario.ca/page/how-make-websites-accessible>)

This includes only new websites and old websites you significantly update and new web content you create.

By December 31, 2014, you need to:

File an Accessibility Compliance Report (<http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report>)

By January 1, 2015, you need to:**[Train your staff on Ontario's accessibility laws \(http://www.ontario.ca/page/how-train-your-staff-accessibility\)](http://www.ontario.ca/page/how-train-your-staff-accessibility)**

Train all your employees and volunteers on the accessibility requirements that apply to their job duties and your organization.

[Make it easy for people with disabilities to provide feedback \(http://www.ontario.ca/page/how-make-information-accessible\)](http://www.ontario.ca/page/how-make-information-accessible)

This includes surveys or comment cards.

By January 1, 2016, you need to:**[Make your public information accessible when asked \(http://www.ontario.ca/page/how-make-information-accessible\)](http://www.ontario.ca/page/how-make-information-accessible)**

Work with the person to figure out how to meet their needs as soon as possible.

[Make your employment practices accessible \(http://www.ontario.ca/page/accessible-workplaces\)](http://www.ontario.ca/page/accessible-workplaces)

- make how you hire, retain and provide career development opportunities accessible
- document your processes for developing individual accommodation plan and return-to-work plans

By January 1, 2017, you need to:**[Make new or redeveloped public spaces accessible \(http://www.ontario.ca/page/how-make-public-spaces-accessible\)](http://www.ontario.ca/page/how-make-public-spaces-accessible)**

- recreational trails and beach access routes
- outdoor public use eating areas
- outdoor play spaces
- public outdoor paths of travel
- parking lots
- service counters
- fixed waiting lines
- waiting areas with fixed seating

By December 31, 2017, you need to:**[File an Accessibility Compliance Report \(http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report\)](http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report)****By December 31, 2020, you need to:****[File an Accessibility Compliance Report \(http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report\)](http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report)****By January 1, 2021, you need to:**

Make all websites and web content accessible (<http://www.ontario.ca/page/how-make-websites-accessible>)

By December 31, 2023, you need to:

File an Accessibility Compliance Report (<http://www.ontario.ca/page/how-complete-your-accessibility-compliance-report>)

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