

Accessibility at Wynford

Wynford is committed to excellence in serving all of our clients, including those with disabilities. This commitment involves delivering on our client service principles while also providing services in a way that supports the dignity and independence of people with disabilities.

If you would like to provide feedback or ask questions about accessibility at Wynford, or if you would like to read our accessibility policy, please contact us at info@wynfordtwg.com. A member of our team will contact you to respond to your feedback, answer your questions or, if requested, send you our policy or any related information.

We are committed to provide accessible formats and communication supports upon request.

Please see below some additional background information on accessibility at Wynford and our **Accessibility for Ontarians with Disability Act (AODA) multi-year plan:**

Accessibility for Ontarians with Disability Act (AODA) Multi Year Accessibility Plan

Part 1: Background and Overview

To facilitate the full participation of persons with disabilities in all aspects of society, including the achievement of accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025, the AODA was passed in 2005. Currently, there are over 1.85 million Ontarians or 15.5% of the population who have a disability.

We support inclusivity and accessibility and preventing and removing barriers to our services; these principles also are aligned with our values.

Accessibility Plan:

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are obligations and requirements that we are committed to adopting to ensure that our workplace and services are fully accessible to the clients, employees and members of the public, including persons with disabilities.

The ISAR requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website by January 1, 2014. In accordance with the ISAR, Wynford's Multi-Year Accessibility Plan outlines our commitments to prevent and remove barriers to accessibility.

The objective of the Plan is to support our compliance with the AODA and the ISAR and Wynford's commitment to treating all people in a way that allows them to maintain their dignity and independence.

Definition of Barriers:

In compliance with the AODA and with our culture and commitment to treating all individuals in a way that allows them to maintain their dignity and independence while creating an inclusive work environment our plan seeks to prevent and remove barriers to accessibility for persons with disabilities.

A "barrier" is anything that prevents a person with a disability from full participating in all aspects of society because of his or her disability. Examples of barriers to accessibility include Physical / Architectural, Attitudinal, Informational/Communication, Systemic, and Technological barriers.

We have further defined barriers as:

Physical/Architectural: design elements of a building or a space that cause problems for persons with disabilities.

Attitudinal: our perceptions of, and how we interact with, persons with disabilities.

Informational/Communication: things/situations that make it difficult for a person with a disability to give, receive or understand information.

Systemic: organizational policies or practices that (often unwittingly) restrict the participation of persons with disabilities.

Technological: poor or in-existent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

Part 2: Wynford's Multi Year Accessibility Plan - Summary of Actions and Timelines

Please note: In accordance with AODA, this Plan is to be reviewed every 5 years - next review January 1, 2019

1.1 Establishment of Accessibility Policies

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.

Action: Development, implementation and maintenance of AODA Customer Service Policy and Integrated Accessibility Standards Policy. Posted on Intranet and on site.

Compliance Timeline: January 1, 2014

1.2 Accessibility Plans

Large organizations shall,

- (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;*
- (b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and*
- (c) review and update the accessibility plan at least once every five years.*

Action: Established, documented, maintained and implemented a multi-year accessibility plan. Posted on corporate website and Intranet.

Compliance Timeline: January 1, 2014

1.3 Training

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.*

Action: Reviewed training requirements related to the ISAR, created training needs for managers and employees based on position, training available online and in accessible formats, tracking ongoing to include new hires onboarding.

Compliance Timeline: January 1, 2015

2.1 Feedback

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.

Action: Developed process for receiving and responding to feedback including to awareness for client facing positions of ISAR requirements and process for requests for accessible formats, what is available and how to escalate if needed.

Compliance Timeline: January 1, 2015

2.2 Accessible Formats & Communication Supports

2.2.1 *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,*

(a) in a timely manner that takes into account the person's accessibility needs due to disability; and

(b) at a cost that is no more than the regular cost charged to other persons.

Action: Creative and Technology to review accessible formats and communication, technology supports currently available at Wynford - now complete
Review current process and develop communication strategy for educating our team on the availability of and process for requesting accessible formats and communication supports - now complete

Compliance Timeline: January 1, 2016

2.2.2 *The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.*

Action: Review and understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual's disability needs and develop a process for responding to a request - now complete

Compliance Timeline: January 1, 2016

2.2.3 *Every obligated organization shall notify the public about the availability of accessible formats and communication supports.*

Action: Add into communication collateral and protocol, and corporate website that in accordance with AODA, accessible format may be made available on request - now complete

Compliance Timeline: January 1, 2016

2.3 Accessible Websites & Web Content

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.

Action: Ensured Technology and Creative Services have been updated on ISAR requirements including future requirements. Have conducted an assessment of current web functionality to ensure compliance requirements and adequate accessibility features through schedule set.

Compliance Timeline:

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: success criteria 1.2.4 Captions (Live) success criteria 1.2.5 Audio Descriptions (Pre-recorded).

3.1 Recruitment, General

Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

Action: Career postings and Intranet have been updated with language to make all internal and external applicants aware that accommodation is available in accordance with AODA.

Compliance Timeline: January 1, 2016

3.2 Recruitment, Assessment or Selection Process

3.2.1 *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.*

3.2.2 *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.*

Action: Various candidate communications (letter, emails, phone call protocol) has been updated including reference to hat in accordance with AODA, accommodation is available upon request; training has been held for HR and managers to support conversations around accommodation requests and inclusive selection strategies;; review conducted of candidate assessment tools and meeting rooms to ensure barriers are removed/accessible features provided upon request in accordance with AODA.

Compliance Timeline: January 1, 2016

3.3 Notice to Successful Applicants

Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.

Action: Updated verbiage in offer letter template related our practice of accommodation of employees with disabilities, and identification of how to find additional information with HR and our Intranet related to accommodation.

Compliance Timeline: January 1, 2016

3.4 Informing Employees of Supports

3.4.1 *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.*

Action: Updated letter of offer language to communicate accommodation practices and where to access additional information on Intranet and website.

Compliance Timeline: January 1, 2016

3.4.2 *Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.*

Action: Accessibility policies and processes to be Incorporated in onboarding process - **complete**

Compliance Timeline: January 1, 2016

3.4.3 *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.*

Action: Develop process and strategy to communicate any policy changes by email and Intranet - complete

Compliance Timeline: January 1, 2016

3.5 Accessible Formats and Communication Supports for Employees

3.5.1 *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,*
(a) information that is needed in order to perform the employee's job; and
(b) information that is generally available to employees in the workplace.

Action: Added information on Intranet and Manager's guide to educate employees and people managers on the availability of accessible format and communication supports; in accordance with AODA, and on the process for requesting accessible formats and communication supports

Compliance Timeline: January 1, 2016

3.5.2 *The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.*

Action: Provide Managers and employees with a process to have conversations related accessible formats and communication supports, share on Managers guide and on the Intranet. - Now Complete

Compliance Timeline: January 1, 2016

3.6 Workplace Emergency Response Information

3.6.1 *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.*

Action: Established process to provide people who request, or for whom Wynford is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information

Compliance Timeline: January 1, 2012

3.6.2 *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.*

Action: Process created for Individualized Workplace Emergency Response Information which includes a mechanism to obtain consent from the individual to share the information with Wynford team member who can provide assistance in the event of an emergency

Compliance Timeline: January 1, 2012

3.6.3 *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.*

Action: Practice now confirmed that upon request, the management team will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible, updated details are now provided in Manager toolkit.

Compliance Timeline: January 1, 2012

3.6.4 *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.

Action: Process developed for creating Individualized Workplace Emergency Response Information - this includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs

Compliance Timeline: January 1, 2012

3.7 Documented Individual Accommodation Plans

3.7.1 *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.*

Action: Reviewed current accommodation processes and practices and have documented and included in Manager toolkit a standard process for the development of individualized accommodation plans; in accordance with AODA

Compliance Timeline: January 1, 2016

3.7.2 *The process for the development of documented individual accommodation plans shall include the following elements:*

- *The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.*
- *The means by which the employee is assessed on an individual basis.*
- *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 accommodation can be achieved and, if so, how accommodation can be achieved.*
- *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 not represented by a bargaining agent, in the development of the accommodation plan.*

Action:

- Creation of a process for the development of documented plans incorporate the following elements (**complete**):
 - Manner in which employee can request, under which circumstances medical is required, who (benefits carrier) will be assessing the medical provided, the steps taken to protect the privacy of the employee's personal information
 - The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done, if an individual accommodation plan is denied
 - The manner in which the reasons for the denial will be provided to the employee
 - The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability
- Work with benefits carrier (disability partner) to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests - **complete**

Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (HR and Benefits Carrier) and what information may be shared - **complete**

Educate team on the Accessibility policies and processes and procedures for requesting individual plans - **complete**

Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA - **complete**

Compliance Timeline: January 1, 2016

3.8 Return to Work Process

3.8.1 *Every employer, other than an employer that is a small organization,*
(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
(b) shall document the process.

3.8.2 *The return to work process shall,*
(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
(b) use documented individual accommodation plans, as part of the process.

Action:

- Worked with LTD benefits provider to review current return to work process and update and document return to work process based on gaps and compliance requirements.
- Document and add to Managers Toolkit and Intranet.

Compliance Timelines: January 1, 2016

3.8.3 *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.*

Action: Return to work documents and process are in accordance with the criteria noted above.

Compliance Timeline: January 1, 2016

3.9 Performance Management

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.

Action:

- Review current performance review processes to ensure accessibility features are incorporated (i.e., forms accessible, conversations in plain text) and ensure any updated/new performance management processes to be rolled out incorporate accessibility features - now complete
- Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation - now complete

Compliance Timelines: January 1, 2016

3.10 Career Development & Advancement

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.

Action:

- Review of current training and professional development materials to determine accessibility features and raise awareness with all training content developers internal and external to ensure all future developed training and materials are developed with accessibility features in mind
- Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA
- Review regularly and track the career progression of individuals with disabilities

Compliance Timelines: January 1, 2016

3.11 Redeployment

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.

Action: Review practices and educate Managers (and update the Manager toolkit) to ensure understanding of current transfer and redeployment practices and processes to ensure any accommodation plans are referenced - **complete**

Compliance Timelines: January 1, 2016