

CPCS Accessibility Policy and Multi-Year Accessibility Plan for Ontario-Based Offices

Statement of Commitment

CPCS Transcom Limited (CPCS) is committed to working towards providing a barrier-free environment in our Ontario-based offices for all stakeholders including our clients/customers, employees, job applicants, suppliers, and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)*, and its associated standards and regulations.

CPCS understands that we have a responsibility for ensuring a safe, dignified, and welcoming environment for everyone. We are committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible and barrier-free environment is a shared effort, and as an organization, CPCS is committed to working with the necessary parties to make accessibility for all a reality. For more detailed information on our accessibility policies, plans, and training programs, please contact our HR Manager.

Intent

This 2015 to 2020 accessibility plan outlines the policies and actions that CPCS Transcom Limited will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the [*Integrated Accessibility Standards, Ontario Regulation 191/11*](#).

| Requirement | ISAR Requirement | Plan to Meet Requirement | Action | Status | Compliance Date |
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| General Requirements | | | | | |
| 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.” | <ul style="list-style-type: none"> → Review the AODA and associated regulations → Consult with outside experts regarding the requirements for our organization → Draft policy for approval by HR Manager and President | <ul style="list-style-type: none"> → An accessibility policy applicable to Ontario-based offices is in place | Complete | January 1, 2014 |
| Multi-Year Plan | <p>“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 their website, if any, 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> | <ul style="list-style-type: none"> → Develop document that lists all items we are required to comply with → List ways in which CPCS will comply with these requirements → Post the multi-year plan on the accessibility section of the website → Review multi-year plan in 2020 and every 5 years thereafter | <ul style="list-style-type: none"> → Multi-year plan developed and posted to website → Made note on website that the document is available in an accessible format upon request → Review scheduled for 2020 | Complete | January 1 and reviewed October 2020 |

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| Training on IASR and the Human Rights Code | <p>“Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization’s policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.”</p> <p>“Every large organization shall keep a record of the training provided under this section...”</p> | <p>→ Review the AODA and associated regulations to obtain information regarding the required content of training</p> <p>→ Use an online training platform to deliver training to all Ontario-based staff and those who participate in the development of CPCS policies</p> <p>→ Review staff completion rates regularly and follow up with staff who have not completed the training</p> <p>→ Require staff to review and sign off on CPCS’ accessibility policy</p> <p>→ Ensure all new staff receive training as part of their orientation</p> | <p>→ Relevant staff have been asked to review requirement and to sign off on CPCS’ accessibility policy</p> <p>→ Online training launched</p> <p>→ Record of training readily available through online training platform</p> <p>→ Accessibility training built into new staff orientation program</p> | Complete | January 1, 2015 |
| Information and Communications Standard | | | | | |
| Feedback Process | <p>“Every obligated organization that has processes for receiving and responding to feedback</p> | <p>→ Include a note on the CPCS website regarding the availability of accessible formats and</p> | <p>→ Information on requesting accessible documents</p> | Complete | January 1, 2015 |

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| | shall ensure that the processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.” | <p>communications supports upon request</p> <p>→ Identify any existing processes in which CPCS would ask the public for feedback</p> <p>→ Set up an email address for accessibility feedback/inquiries</p> | <p>has been made available on the website</p> <p>→ Feedback processes identified and only include the process for obtaining feedback on CPCS’ accessibility</p> <p>→ accessibility@cpcs.ca set up for accessibility feedback/inquiries</p> | | |
| Accessible formats and communication supports | <p>“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>→ Use required training to familiarize staff with the potential accessible formats and communication supports that a person with a disability may request</p> <p>→ Seek out more specialized training for staff who may be responsible for converting documents into an accessible format</p> <p>→ Utilize accessibility section of website to notify public of availability of accessible formats and communication supports</p> | <p>→ Required training launched</p> <p>→ Specialized training for converting documents into accessible formats has been provided to relevant staff</p> <p>→ A notice on providing accessible documents upon request has been published on website</p> | Complete | January 1, 2016 |

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| | <p>(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>(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.”</p> | | | | |
| Accessible websites and web content | <p>“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.”</p> | <p>→ Seek clarification on the requirements for an organization transitioning from a small to a large organization</p> <p>→ Seek out specialized training for staff who may be responsible for converting documents into an accessible format and publishing these on the CPCS website</p> <p>→ Investigate ways to make the CPCS</p> | <p>→ Clarification has been sought from the Ontario Government and an external HR Consultant</p> <p>→ Specialized training for converting documents into accessible formats has been provided to relevant staff</p> <p>→ Options for converting the entire CPCS website to WCAG 2.0 Level AA standards will be explored</p> | Complete | October 1, 2020 |

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| | | website conform to WCAG 2.0 Level AA standards by 2021 | → New CPCS website, compliant with WCAG 2.0 Level AA to be launched. | | |
| Employment Standards | | | | | |
| Recruitment, Assessment and Selection Process | <p>“Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.</p> <p>(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.</p> <p>(2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a</p> | <p>→ Draft a statement regarding the availability of accommodation during the recruitment process for inclusion on recruitment ads</p> <p>→ Include a standard statement regarding the availability of accommodation and the means for obtaining accommodation when contacting a candidate for an interview</p> <p>→ Consult with the candidate to determine suitable accommodation</p> | <p>→ A standard statement has been drafted and added to the job ad template</p> <p>→ The same statement will be used when notifying candidates who have been selected for an assessment of the availability of supports</p> | Complete | January 1, 2016 |

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| | suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability." | | | | |
| Notice to Successful Candidate | "Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities." | → Draft a standard statement to include in notifications to successful candidates that accommodations for disabilities are available | → A standard statement has been drafted for inclusion on notifications to successful candidates | Complete | January 1, 2016 |
| Informing Employees of Supports | <p>"(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.</p> <p>(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> | <p>→ All relevant employees will be asked to review CPCS' Accessibility Policy</p> <p>→ Relevant new employees to review CPCS Accessibility Policy as part of their orientation</p> <p>→ Provide any policy updates to employees using E-mail and internal website</p> | <p>→ All relevant staff have been asked to review and sign off on CPCS' Accessibility Policy</p> <p>→ Relevant new employees will be asked to review CPCS' Accessibility Policy as part of the orientation process</p> | Complete | January 1, 2016 |

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| | (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." | | | | |
| Accessible Formats and Communication Supports for Employees | <p>"(1) 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>(2) The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support."</p> | → Establish and utilize a policy to consult and work with employees requesting accommodation to provide or arrange for accessible formats and communication supports for information that is needed to perform their job or that is generally available to employees in the workplace | → Policy has been established | Complete | January 1, 2016 |

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| Workplace Emergency Response Information | <p>“(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>(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.</p> <p>(3) Employers shall provide the information required under this section as soon as practicable after the</p> | <p>→ Establish and utilize a policy to:</p> <p>a) provide individualized workplace emergency response information to employees who have a disability when a need arises</p> <p>b) If needed and given consent, share this information with the designated person required to provide assistance</p> <p>c) provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the</p> | <p>→ Policy has been established</p> | Complete | January 1, 2012 |

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| | <p>employer becomes aware of the need for accommodation due to the employee's disability.</p> <p>(4) Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <p>(b) when the employee's overall accommodations needs or plans are reviewed; and</p> <p>(c) when the employer reviews its general emergency response policies."</p> | <p>employee's disability</p> <p>d) 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; and when the employer reviews its general emergency response policies</p> | | | |
| Documented Individual Accommodation Plans | "(1) Employers shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. | → Establish process for developing and documenting individual accommodation plans | → Process has been developed and documented | Complete | January 1, 2016 |

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| | (2) The process for the development of documented individual accommodation plans shall include..." all elements specified in the regulation. | | | | |
| Return to Work Process | <p>"(1) Every employer...,</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> <p>(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> | → Establish process for developing and documenting return to work plans | → Process has been developed and documented | Complete | January 1, 2016 |

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| | (b) use documented individual accommodation plans, as described in section 28, as part of the process.” | | | | |
| Performance Management Process | “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.” | → Establish and utilize a policy to take into account the accessibility needs of employees with disabilities as well as individual accommodation plans when using its performance management process | → Policy has been established | Complete | January 1, 2016 |
| Career Development and 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.” | → Establish and utilize a policy to 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 | → Policy has been established | Complete | January 1, 2016 |

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| 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." | → Establish and utilize a policy to take into account the accessibility needs of its employees with disabilities, as well as accommodation plans, when redeploying employees with disabilities | → Policy has been established | Complete | January 1, 2016 |