

## Integrated Accessibility Standards - Multi-Year Accessibility Plan 2017 - 2020

Updated December 6, 2017

| AODA Standards  | Regulation  | Activities or Action(s) to be Taken   | Responsibility                  | Target Date          | Status                                  |
|---|---|---|---------------------------------|----------------------|---|
| <b>General Requirements</b>   |   |   |                                 |                      |   |
| Establish and post Accessibility policy   | Develop, implement and maintain policies governing how organizations achieves or will achieve accessibility through meeting it's requirements   | Create an accessibility policy for WES  | HR                              |                      | Completed - Apr 2017                    |
|   | Include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies  | Incorporate organizational commitment statement into the policy   | HR                              |                      | Completed - Apr 2017                    |
|   | Make the documents publicly available and shall provide them in an accessible format upon request   | Post the policy on WES' website   | Marketing/Web                   |                      | Completed - Apr 2017                    |
| Training  | Provide training on the requirements of the accessibility standards and Human Rights Code as it pertains to persons with disabilities   | All employees, contractors and Board members were provided instructions to take online training modules via accessforward.ca          | HR                              |                      | Completed - Apr 2017                    |
|   | Train all employees, policy developers, volunteers, contractors and Board members on the accessibility policy and requirements  | HR will follow-up with anyone who did not submit a record of training   | HR                              |                      | Completed and Ongoing for new employees |
|   | Every person to receive training shall be trained as soon as practicable  | Need to train all 3rd party customer service reps (Premier)   | HR                              |                      | Completed - Nov 2017                    |
|   | A record of training shall be kept including dates on which training was provided and number of individuals to whom training was provided   | Develop a new orientation process to incorporate required accessibility training and associated policies/procedures for all new hires | HR                              |                      | Completed - Dec 2017                    |
| Multi-Year Accessibility Plan   | Establish, implement, maintain an document a Multi-Year Accessibility Plan that outlines the strategy to remove and prevent barriers  | Establish project committee to develop plan   | HR/Marketing/Web (Project team) |                      | Completed-Oct 2017                      |
|   |   | Draft multi-year accessibility plan for WES   | Project team                    |                      | Completed - Dec 2017                    |
|   |   | Review draft with Senior Management team for input/approval   | Project team                    |                      | Completed - Dec 2017                    |
|   |   | Post WES' Multi-Year Plan on website  | Marketing/Web                   |                      | Completed - Dec 2017                    |
|   | Establish, review and update the accessibility plans in consultation with persons with disabilities and if established, an accessibility committee  | Consult with JHSC members and/or persons with disability regarding multi-year plan  | HR                              | Q1 2018              |   |
|   | Prepare annual status report on the plan progress   | Review and regularly update plan to track progress once established   | Project team                    |                      | Ongoing                                 |
| Post the status report on the website and provide the report in an accessible format upon request |   | Marketing/Web   |                                 | Completed - Dec 2017 |   |
| File compliance report  | File a compliance report every 3 years once exceed 50 employees   | File a compliance report by end of 2017   | HR                              |                      | Completed - Dec 2017                    |
| <b>Customer Service</b>   |   |   |                                 |                      |   |
| Establish and post policies   | Employer shall establish policies, practices and procedures governing the provision of its goods and services to persons with disabilities  | Create an Accessible Customer Service policy for WES  | HR                              |                      | Completed - Apr 2017                    |
|   |   | Communicate policy to employees and upload a copy of the policy to the shared drive/intranet for employees to access                  | HR                              |                      | Completed - Apr 2017                    |
|   |   | Post the policy on WES' website   | Marketing                       |                      | Completed - Apr 2017                    |
|   | Shall ensure that its policies, practices and procedures are consistent with the following principles:<br>- goods and services provided in a manner that respects the dignity and independence of persons with disabilities<br>- provision of goods or services must be integrated unless an alternate measure is necessary to enable a person with a disability to obtain, use or benefit from the goods or services<br>- persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods or services | These principles are incorporated into the Accessible Customer Service policy   | HR                              |                      | Completed - Apr 2017                    |

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|  | Policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the provider's goods or services or the availability, if any, of other measure which enable them to do so   | The use of assistive devices is incorporated into the policy                              | HR             |             | Completed - Apr 2017 |
|  | Communicating with a person with a disability shall be done in a manner that takes into account the person's disability  | Appropriate communication with a person with a disability is incorporated into the policy | HR             |             | Completed - Apr 2017 |
| Use of service animals and support persons | A person with a disability accompanied by a guide dog or other service animal shall be permitted to enter the premises with the animal and to keep the animal with him or her unless the animal is excluded by law from the premises   | Each requirement has been incorporated into the policy                                    | HR             |             | Completed - Apr 2017 |
|  | If a service animal is excluded from the premises, the provider of goods or services shall ensure that other measures are available to enable the person with the disability to obtain, use or benefit from the provider's good or services  |   | HR             |             | Completed - Apr 2017 |
|  | A person with disability accompanied by a support person...the provider of goods or services shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises   |   | HR             |             | Completed - Apr 2017 |
|  | Provider of goods and services may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises  |   | HR             |             | Completed - Apr 2017 |
|  | Provider of goods aor services shall ensure that notice is given in advance about any fee for admission to premises in respect to the support person   |   | HR             |             | Completed - Apr 2017 |
|  | Provider of goods or services shall prepare one or more documents describing its policies and practices and procedures with respect to the matters governed by this section and, upon request, shall give a copy of a document to any person   |   | HR             |             | Completed - Apr 2017 |
|  |  |   |                |             |                      |
| Notice of temporary disruption             | If there is a temporary disruption in provision of services, the provider shall give notice of the disruption to the public  | Each requirement has been incorporated into the policy                                    | HR             |             | Completed - Apr 2017 |
|  | Notice of disruption must include information about the reason for the disruption, anticipated duration and alternative facilities/services that are available   |   | HR             |             | Completed - Apr 2017 |
|  | Notice may be given by posting the information on premises, on website or by such other method as is reasonable in the circumstances   |   | HR             |             | Completed - Apr 2017 |
|  | Provider of goods or services shall prepare one or more documents describing its policies and practices and procedures with respect to the matters governed by this section and, upon request, shall give a copy of a document to any person   |   | HR             |             | Completed - Apr 2017 |
| Training                                   | Every provider of goods or services shall ensure that the following persons receive training about the provision of its goods or services to persons with disabilities:<br>- Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer or otherwise<br>- Every person who participates in developing the provider's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties. | Refer to training under General requirements  | HR             |             | Completed - Apr 2017 |

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|  | <p>Training must include a review of the purposes of the Act The training must include a review of the purposes of the Act and the requirements of this Regulation and instruction about the following matters:</p> <ul style="list-style-type: none"> <li>- How to interact and communicate with persons with various types of disability</li> <li>- How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person</li> <li>- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability</li> <li>- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services</li> </ul> |  |                |             | Completed - Apr 2017 |
|  | Training must be provided to each person as soon as is practicable after he or she is assigned the applicable duties  |  |                |             | Ongoing              |
|  | Training must be provided on an on-going basis in connection with changes to the policies, practices and procedures governing the provision of goods or services to persons with disabilities   |  |                |             | Ongoing              |
|  | Provider of goods or services shall prepare one or more documents describing its policies and practices and procedures with respect to the matters governed by this section and, upon request,  |  |                |             | Completed - Apr 2017 |
|  | Provider of goods or services shall keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided  |  |                |             | Completed - Apr 2017 |
| Feedback process                                 | Establish process to receive and respond to feedback from persons with a disability regarding accessibility   | Refer to Feedback Process under Information and Communication standards  | HR             |             | Completed - Apr 2017 |
|  | Feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or otherwise   | Incorporated into policy that feedback be provided to HR Manager with phone, email and mailing address provided  | HR             |             | Completed - Apr 2017 |
|  | Feedback process must specify the actions that the provider of goods or services is required to take if a complaint is received   | HR will contact the complainant upon receipt and consult internally to address the complaint within 1 week. Add this to Accessible Customer Service policy under Feedback Process. | HR             |             | Completed - Nov 2017 |
|  | Provider of goods or services shall prepare one or more documents describing its policies and practices and procedures with respect to the matters governed by this section and, upon request, shall give a copy of a document to any person  | Refer to Feedback Process under Information and Communication standards  | HR             |             | Completed - Apr 2017 |
| <b>Information &amp; Communication Standards</b> |   |  |                |             |                      |
| Feedback process                                 | Establish process to receive and respond to feedback regarding accessibility  | Document feedback process in WES' accessibility and accessible customer service policies   | HR             |             | Completed - Apr 2017 |
|  | Notify the public regarding the feedback process  | Accessibility policies posted on website   | HR             |             | Completed - Apr 2017 |
| Accessible formats and communication supports    | Provide accessible formats and communication supports in a timely manner, taking into account the persons disability and at a cost no more than the regular charge to other persons   | Establish internal resources and/or vendors to provide services in alternative formats.  | HR & Marketing |             | In progress          |
|  |   | Upon request, documents and communication supports will be provided that meets each of the criteria outlined   |                |             | Ongoing              |
|  | Consult with person requesting to determine suitability of accessible format and communication support  | Develop internal process to handle such requests   | HR             |             | In progress          |
|  | Notify the public of availability of accessible format and communication supports upon request  | Accessibility policies posted on website   |                |             | Completed - Apr 2017 |

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| Emergency procedure plans & public safety information | If emergency procedures, plans and public safety information are made available to the general public, those material must be made available in an accessible format or with appropriate communication supports upon request   | Establish internal resources and/or vendors to provide services in alternative formats and this will be provided upon request.   | Project team   |             | In progress          |
| Accessible websites and web content                   | Ensure internet websites and web content conform to WCAG 2.0 Level A for newly created or refreshed websites   | Communicate and inform Marketing and webmasters of the WCAG 2.0 Level A guidelines   | Marketing/Web  |             | Completed - Sep 2017 |
|   |  | Develop an action plan towards compliance for each requirement   | Marketing/Web  |             | In progress          |
|   |  | As webpages are reviewed and updated, adjustments will be made where necessary to improve accessibility  | Marketing/Web  |             | In progress          |
|   | Ensure all websites and web content to WCAG 2.0 Level AA by January 1, 2021. Excluding: Live captions and audio descriptions (pre-recorded)  |  | Marketing/Web  | Jan 1, 2021 | Ongoing              |
|   | In determining whether meeting the requirements is not practicable, the organization may consider:<br>- availability of commercial software, tools or both; and<br>- significant impact on implementation timeline that is planned or initiated before Jan 1, 2012             | WES shall determine whether the requirements to comply as outlined are practicable   | Marketing/Web  |             | Completed - Nov 2017 |
| <b>Employment Standards</b>                           |  |  |                |             |                      |
| Workplace emergency response plan                     | The employer shall provide individualized workplace emergency response information to employees who have a disability as (temporary or permanent) as soon as possible after the employer is made aware   | Send a memo to employee base to inquire if anyone needs individualized emergency information   | HR             |             | Completed - Dec 2017 |
|   |  | Create an individualized emergency plan for those employees who has disclosed a disability   | HR             |             | Ongoing              |
|   | With the employee's consent, employer shall communicate the plan to a person(s) designated to provide assistance to the employee   | For each employee who requires emergency response assistance and has provided consent, WES shall provide the information to the Fire Warden and/or another designated person in the event of an emergency in the workplace | HR             |             | Ongoing              |
|   |  | A record of the plans and list of employees who have disclosed a disability will be maintained and updated annually  | HR             |             | Ongoing              |
|   | The employer shall review the individualized emergency plan:<br>- when employee moves to a different work location;<br>- when the employee's accommodation needs are reviewed or are changed; and<br>- when employer reviews its general emergency response plans and policies |  | HR             |             | Ongoing              |
| Recruitment and selection                             | The employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process   | Add on all job postings in Canada that WES will accommodate applicants throughout the recruitment process upon request   | HR             |             | Completed - Oct 2017 |
|   |  | Add statement on WES' Career page under employment equity section.   | HR & Marketing |             | Completed - Nov 2017 |
|   | The employer shall notify job applicants when selected for interview/assessment, that accommodations are available upon request in relation to the materials or processes to be used   | Incorporated into hiring process for verbal delivery when candidate is contacted for interview/assessment to advise accommodation will be provided if requested  | HR             |             | Completed - Nov 2017 |
|   | If 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                  | If candidate requests an accommodation, HR shall work with the candidate to make suitable arrangements for accommodation   | HR             |             | Ongoing              |
|   | The employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities  | Add a general statement in the offer letter template directing the candidate to reference WES' accessibility policies found on its website   | HR             |             | Completed - Dec 2017 |

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| Informing employees of supports                             | The employer shall inform its employees of its policies used to support its employees with disabilities including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability   | All existing employees will be informed of the Accessibility policies in place that outlines accommodation processes available to them   | HR             |             | Completed - Apr 2017 |
|   |  | All policies and procedural information related to accessibility is accessible by employees via the internal shared drive/ HR intranet site  | HR             |             | Completed - Dec 2017 |
|   | The employer shall provide information to new employees as soon as practicable after they begin their employment   | Develop new orientation process to ensure new employees are informed of the accessibility policies in place and to advise HR should they require any accommodation or supports   | HR             |             | Completed - Nov 2017 |
|   | The employer 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 a disability  | Any changes to existing accessibility policies will be communicated internally and posted on WES' shared drive/intranet and if applicable, WES' public website   | HR             |             | Ongoing              |
| Accessible formats and communication supports for employees | Upon request, the employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:<br>- info needed to perform the employee's job; and<br>- info that is generally available to employees in the workplace   |  | HR             |             | Ongoing              |
|   | The employer shall consult with the employee to determine suitability of an accessible format or communication support   |  | HR             |             | Ongoing              |
| Individual accommodation plan (IAP)                         | Employers shall develop a written process for the development of documented individual accommodation plans (IAP) for employees with disabilities   | IAP process is outlined in the Accessibility policy. The sample individual accommodation plan template as provided from Ontario Accessibility website will be used ( <a href="https://www.ontario.ca/page/accessible-workplaces#section-6">https://www.ontario.ca/page/accessible-workplaces#section-6</a> ) | HR             |             | Completed - Apr 2017 |
|   | The IAP process to develop individual accommodation plans for employees shall include:<br>- how employees can participate<br>- how employees will be assessed<br>- how employer can request a medical evaluation to assist the employee in determining if accommodation can be achieved and if so how it can be achieved<br>- how employee can request participation of union or other representatives in the development of the accommodation plan<br>- how employee's personal information will remain private<br>- how and how often plan will be reviewed and updated and how this is to be done<br>- how reasons for denied request would be communicated<br>- how plan will be provided to employee in a format that takes into account the employee's accessibility needs due to a disability | The required elements have been incorporated into the process as outlined in WES' accessibility policy   | HR             |             | Completed - Apr 2017 |
| Return to work process                                      | Every employer shall develop a return to work process for employees who have been absent due to a disability and require disability-related accommodations in order to return to work; and shall document the process  | HR will work with the employee to develop a return to work plan using the sample template provided by Ontario Accessibility website  | HR             |             | Ongoing              |
|   |  | The documented plan will be kept on file and maintained by HR  | HR             |             | Ongoing              |
|   | The return to work process shall:<br>- outline the steps the employer will take to facilitate the return to work of employees; and<br>- use documented individual accommodation plans as part of the process   |  | HR             | Q1, 2018    |                      |

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| Performance Management | The employer shall take in to account the accessibility needs of employees with disabilities as well as individual accommodation plans, when using its performance management process  |                                     | HR             | Jan 30, 2018 |        |
| Career development     | The employer shall take in to account the accessibility needs of employees with disabilities as well as individual accommodation plans, when providing career development and advancement to its employees with disabilities |                                     | HR             | Jan 30, 2018 |        |
| 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               |                                     | HR             | Jan 30, 2018 |        |

### Identify and Remove Barriers: 2017 - 2020

| Barriers                      | Activities / Action(s) to Take  | Responsibility | Target Completion Date | Status  |
|-------------------------------|---|----------------|------------------------|---|
| Information and Communication | Research and establish external vendors who can provide documents in alternative formats that is not feasible to do in-house (i.e. conversion to Braille, captioning, etc)  | Project team   | Q1 2018                | In progress   |
|                               | Appoint a staff person to be familiar with logistics of planning meetings or presentations where persons with disabilities may be attending   | Project team   | Q1 2018                |   |
|                               | Establish a human review process by a person with disability  | Project team   | Q1 2018                |   |
| Policy & Attitudinal          | Train employees or those responsible for creating documents, presentations and promotional material on how to make documents accessible (i.e. formatting, write in plain language and in alternative formats that is compatible with screen readers etc). | Project team   | Q1 2018                | Exploring different vendors to inquire re training  |
| Technology                    | Lack of software and tools currently to ensure accessibility of web content.  | Marketing/Web  | Q1 2018                | In progress to examine the different software tools and options available (i.e. automation or tool to identify and prioritize accessibility issues) that is best suited for WES |
|                               | Test website with screen reader to ensure documents posted can be read  | Marketing/Web  | Q1 2018                |   |
|                               | Test any design collaboration and software for accessibility  | Marketing/Web  | Q1 2018                |   |
|                               | Train web team on accessibility standards   | Marketing/Web  | Q1 2018                |   |
|                               | Research other vendors to replace Webex to make video and webconferencing more accessible   | Marketing/Web  | Q1 2018                | Will audit the different solutions in 2018 to determine next steps  |
| Physical Space                | Research vendors or non-profit organizations who can help WES proactively identify physical barriers in the workplace   | Project team   | Q1 2018                |   |
|                               |   |                |                        |   |
|                               |   |                |                        |   |
|                               |   |                |                        |   |
|                               |   |                |                        |   |