

# ***SKYGRiD* ACCESSIBILITY PLAN**

**2014 - 2021**

## **SKYGRiD'S STATEMENT OF COMMITMENT:**

*SKYGRiD* is committed to treating all people in a manner which 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, 2005*.

## SKYGRiD'S MULTI YEAR ACCESSIBILITY 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.	Policy drafted and approved on December 8, 2014.	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 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>	<p>Identifying barriers in the workplace on an ongoing basis.</p> <p>Will post final multi-year plan on the website before December 31, 2014.</p> <p>Human Resources will review the plan periodically and make changes as needed.</p>	<p>Ongoing</p> <p>Complete</p> <p>Ongoing</p>	January 1, 2014

6	Self-Serve Kiosks	6.(2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	If applicable, SKYGRiD will work with developer of self-serve kiosks to ensure kiosks are made accessible.	Ongoing	January 1, 2014
7	Training	<p>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,</p> <p>(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.</p>	<p>Initial training on the Customer Service Standard was completed in 2014.</p> <p>Further training on Ontario Regulation 191/11 - Integrated Accessibilities Standards will be designed and delivered in 2015 to employees, volunteers, and persons who participate in developing the company's policies in classroom and online format.</p>	<p>Complete</p> <p>Ongoing</p>	January 1, 2015

**PART II – Information and Communications Standards** (Sections 15-18 are not applicable)

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.	<p>Conduct a review of all feedback processes across SKYGRiD.</p> <p>Determine accessible formats for communication.</p> <p>Ensure all staff are aware of the need to accommodate upon request and how to do that. This will be integrated into the scheduled training on the Integrated Accessibility Standard.</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Complete</p>	January 1, 2015
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>Will determine what accessible formats &amp; communication supports we will provide to persons with disabilities upon request (within 24 hours if not immediately).</p> <p>Communicate information to staff to ensure everyone is aware of available materials/formats via training on the Integrated Accessibility Standard.</p>	<p>Ongoing</p> <p>Complete</p>	January 1, 2016

12		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>Communicate to staff and management of this requirement.</p> <p>Develop protocol for situations where a suitable agreement cannot be made.</p>	<p>Ongoing</p> <p>Ongoing</p>	January 1, 2016
12		12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Information will be available on our website.	Complete	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.	<p>Post Emergency Procedures, Plans or Safety information in an area where it is available to the public.</p> <p>The Joint Health &amp; Safety Committee will be responsible to ensure this is completed.</p>	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.	<p>Any new content or changes made to the SKYGRiD website in 2014 conforms to the WCAG 2.0 Level A Standards. Moving forward, all contents in the years to come will meet the Level A standards.</p> <p>By 2021, using our web developers assistance, we will ensure that the website conforms to the WCAG 2.0 Level AA Standards.</p>	Ongoing	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p>

					<ul style="list-style-type: none"> <li>• success criteria 1.2.4 Captions (Live)</li> <li>• success criteria 1.2.5 Audio Descriptions (Pre-recorded).</li> </ul>
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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.	<p>Include statement in job advertisement, identify different options for where job advertisements may be posted (e.g., paper, website, bulletin board)</p> <p><b>Recruitment Statement for Accommodation:</b></p> <p>SKYGRiD is committed to building a diverse workforce representative of the communities we serve. Only selected candidates will be contacted for an interview. Accommodation will be provided in all parts of the recruitment and assessment (if applicable) process as required under SKYGRiD's Accessibility policies and procedures. Applicants must make their accommodation needs known upon requests for interviews.</p>	Complete	January 1, 2016

23	Recruitment, Assessment or Selection Process	<p>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.</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 suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.</p>	<p>Determine "how" to notify applicants – telephone, email, letter or other alternative means that takes into account their need for accommodation.</p> <p>Identify barriers in the Recruitment process: location of interview room, format of tests (if applicable), room set up for interviewee, interviewing timelines, supports, paperwork.</p>	<p>Complete</p> <p>Ongoing</p>	January 1, 2016
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.	Include a statement in future offer letters confirming that SKYGRiD will support the accessibility needs of its employees.	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.	<p>Policy added to employee handbook and posted on the employee intranet (if available)</p> <p>Communicate with a follow-up email in regards to any updates/changes to the policy</p>	<p>Complete</p> <p>Ongoing</p>	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.	<p>Provide new hires with the Accessibility policies, and review it with them as a part of the onboarding process.</p> <p>New hires will receive mandatory accessibility training as well.</p>	<p>Ongoing</p> <p>Ongoing</p>	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.	Policy revisions will be updated in the employee handbook and posted on the employee intranet  Communicate updates in a follow-up email	Complete  Ongoing	January 1, 2016
26	Accessible Formats & Communication Supports for Employees	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,  (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.	Conduct an audit of regular communications at SKYGRiD.	Ongoing	January 1, 2016
26		26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	List of what employee will require, and ensure that their accessibility needs are met.	Ongoing	January 1, 2016
27	Workplace Emergency Response Information	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.	In the event that SKYGRiD becomes aware of an employee's disability, the Company will ensure that the employee is provided with information on emergency response protocols that will take into account their individualized requirements.	Ongoing	January 1, 2012



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.	With the employee's permission, we will assign designated individuals to ensure emergency response processes are met.	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.	See 27 (1).	Ongoing	January 1, 2012
27		(4) Every employer shall review the individualized workplace emergency response information, <ul style="list-style-type: none"> <li>(a) when the employee moves to a different location in the organization;</li> <li>(b) when the employee's overall accommodations needs or plans are reviewed; and</li> <li>(c) when the employer reviews its general emergency response policies.</li> </ul>	Review individualized workplace emergency response information every year, or as changes occur (i.e. legislation updates, job transfers, etc).  We will ensure the individualized emergency response information is updated and communicated to affected employees.	Ongoing  Ongoing	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.	Develop a written process for implementing accommodation plans for persons with disabilities	Complete	January 1, 2016
28		<p>28 (2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> <li>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>2. The means by which the employee is assessed on an individual basis.</li> <li>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.</li> <li>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 not represented by a bargaining agent, in</li> </ol>	The elements listed in the Regulation 191/11 shall be incorporated into the Accommodation Plan Process.	Complete	January 1, 2016

		<p>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>	Develop a written process for implementing a return to work plan for persons with a disability.	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>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>	<p>The elements listed in the Regulation 191/11 shall be incorporated into the Return to Work Process.</p>	Complete	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>Review current Performance Management process.</p> <p>Evaluate different options for administering the performance management process to take into account the individual needs of persons with a disability and consider the different methods to provide feedback to employees – on paper, verbally, on-line, etc.</p> <p>If a person with a disability has an Individual Accommodation Plan (IAP), take into account how information needs to be communicated to these individuals.</p>	<p>Complete</p> <p>Complete</p> <p>Ongoing</p>	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.	Review current Succession Plan and Career Development practices.  Need to keep IAP's in mind when making career development and advancement decisions.	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.	Review current Re-deployment (transfer) processes to take into account the individual needs of persons with a disability as well as any IAP's.	Ongoing	January 1, 2016

**SKYGRiD ACCESSIBILITY POLICIES (CUSTOMER SERVICE STANDARD & INTEGRATED ACCESSIBILITY STANDARDS) ARE AVAILABLE UPON REQUEST. THE POLICIES AND MULTI-YEAR ACCESSIBILITY PLAN ARE AVAILABLE IN ACCESSIBLE FORMAT UPON REQUEST.**

**FOR MORE INFORMATION, PLEASE CONTACT:**

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