

***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>Controller will review the plan periodically and make changes as needed.</p>	Ongoing	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>	Scheduled for Spring 2015	January 1, 2015

PART II – Information and Communications Standards

Section	Initiative	Description	Action	Status	Compliance Date
11	Feedback	<p>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>	<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>	Ongoing	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 & 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>Potential options to be finalized include: adding a statement in an email signature about format accommodation, ensure this is referenced in Company offer letters, etc.</p>	Ongoing	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>	Ongoing	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 at our reception area and on our website.	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.	<p>Post Emergency Procedures, Plans or Safety information in an area where it is available to the public.</p> <p>The Joint Health & 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"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5 Audio Descriptions (Pre-recorded).
15	Educational & Training Resources & Materials	<p>15(1) Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:</p> <ol style="list-style-type: none"> 1. Provide educational or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person with a disability to whom the material is to be provided by, <ol style="list-style-type: none"> i. procuring through purchase or obtaining by other means an accessible or conversion ready electronic format of educational or training resources or materials, where available, or ii. arranging for the provision of a comparable resource in an accessible or conversion ready electronic format, if educational or training resources or materials cannot be procured, obtained by other means or converted into an accessible format. 	N/A	N/A	January 1, 2013

		2. Provide student records and information on program requirements, availability and descriptions in an accessible format to persons with disabilities.			
16	Training to Educators	16(1) In addition to the requirements under section 7, obligated organizations that are school boards or educational or training institutions shall provide educators with accessibility awareness training related to accessible program or course delivery and instruction.	N/A		January 1, 2013
		(2) Obligated organizations that are school boards or educational or training institutions shall keep a record 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.	N/A		January 1, 2013
17	Producers of Educational or Training Material	17(1) Every obligated organization that is a producer of educational or training textbooks for educational or training institutions shall upon request, make accessible or conversion ready versions of the textbooks available to the institutions.	N/A		January 1, 2015 For accessible or conversion ready versions of textbooks
		(2) Every obligated organization that is a producer of print-based educational or training supplementary learning resources for educational or training institutions shall upon request, make accessible or conversion ready versions of the printed materials available to the institutions.	N/A		January 1, 2020 For accessible or conversion ready versions of printed materials that are educational or training supplementary

					learning resources.
18	Libraries of educational & training institutions	<p>18(1) Subject to subsection (2) and where available, the libraries of educational and training institutions that are obligated organizations shall provide, procure or acquire by other means an accessible or conversion ready format of print, digital or multimedia resources or materials for a person with a disability, upon request.</p> <p>(2) Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1).</p>	N/A		<p>January 1, 2015 For print-based resources or materials</p> <p>January 1, 2020 For digital or multimedia resources or materials</p>

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>Sample Recruitment Statement for Accommodation.</p> <p>We are committed to providing accommodation for persons with disabilities. If you require accommodation, we will work with you to meet your needs throughout the recruitment process.</p>	Ongoing	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>Develop interview guidelines that takes into account accommodation for persons with disabilities.</p>	Ongoing	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.	Ongoing	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.	Policy added to employee handbook and posted on the employee intranet (if available) Communicate in a Town Hall meeting and with a follow-up email in regards to any updates/changes to the policy	Ongoing	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.	Provide new hires with the Accessibility policies, and review it with them as a part of the onboarding process. New hires will receive mandatory accessibility training as well.	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.	Policy revisions will be updated in the employee handbook and posted on the employee intranet Communicate updates in a town-hall meeting with a follow-up email	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	Conduct an audit of regular communications at SKYGRiD.	Ongoing	January 1, 2016

		(b) information that is generally available to employees in the workplace.			
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, (a) when the employee moves to a different location in the organization;	Review individualized workplace emergency response information every year, or as changes occur (i.e. legislation updates, job transfers, etc).	Ongoing	January 1, 2012

		<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>	We will ensure the individualized emergency response information is updated and communicated to affected employees.		
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.	<p>Develop a written process for implementing accommodation plans for persons with disabilities</p> <p>Create a template to document individual accommodation plans when the need arises.</p>		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"> 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 not represented by a bargaining agent, in 	The elements listed in the Regulation 191/11 shall be incorporated into the Accommodation Plan Process.		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>	<p>Develop a written process for implementing a return to work plan for persons with a disability.</p> <p>Create a template to document the return to work process.</p>		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>	The elements listed in the Regulation 191/11 shall be incorporated into the Return to Work Process.		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>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>		January 1, 2016
31	Career Development & Advancement	<p>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</p>	<p>Review current Succession Plan and Career Development processes.</p>		January 1, 2016

		career development and advancement to its employees with disabilities.	Need to keep IAP's in mind when making career development and advancement decisions.		
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 processes to take into account the individual needs of persons with a disability as well as any IAP's.		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:

NATASHA ESSOP

PHONE NUMBER: (416) 622-9602

EMAIL: nessop@skygrid.ca

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