



# Accessibility Plan

## Mohawk Shared Services

### 2014-2019

This Publication is available on the Mohawk Shared Services website ([www.mohawkssi.com](http://www.mohawkssi.com))

# Accessibility Plan

## Executive Summary

Mohawk Shared Services supports the right of persons of all ages with disabilities to equal opportunity and employment opportunities. Removing barriers to daily living is not a voluntary measure, but a fundamental human right and constitutional right of equality for persons with disabilities. This is provided under the Canadian Charter of Rights and Freedom, the Accessibility for Ontarians Disability Act (AODA) and the Ontario Human Rights Code. Mohawk Shared Services is committed to build on what it has already achieved and to move towards an organization in which no new barriers are created and existing ones are removed.

### 1.1 Purpose

To remove the barriers for people with disabilities through increased awareness, understanding and identification of their needs for accessibility planning, implementation and evaluation.

The goal of the multi-year plan is linked to the 2005 *Accessibility for Ontarians with Disabilities Act (AODA)*. The AODA is to improve opportunities for people with disabilities and to provide for their involvement in the identification, removal and prevention of barriers to their full participation in the life of the province.

Effective July 27, 2007, Accessibility Standards for Customer Service under the Accessibility for Ontarians with Disabilities Act (2005) were received. These standards direct public sector organizations to develop a variety of tools and services to ensure citizens with disabilities engage in full participation in activities within the province of Ontario.

These standards were implemented in the public sector January 1, 2010.

They represent substantial changes to Policy and Procedure in Public Sector organizations. This plan is reflective of ongoing work to address access issues within all sites Mohawk Shared Services.

This plan will outline:

1. The measures that Mohawk Shared Services has taken in the past 5 years (2010-2014).
2. The measures that Mohawk Shared Services will take over the next 5 years, 2015-2019, to identify, remove and prevent barriers to people with disabilities who work in or use the services of Mohawk Shared Services.

## Aim and Objectives

This report will:

- Describe the process by which Mohawk Shared Services will identify, remove and prevent barriers for people with disabilities.
- Describe the measures Mohawk Shared Services will take in the coming year to identify, remove and prevent barriers for people with disabilities.
- Outline the review and monitoring process of the multi-year Accessibility Plan.
- Describe how Mohawk Shared Services will make this Accessibility Plan available to the public.

## Background

The Accessibility of Ontarians with Disabilities Act (2005) is aimed at creating a barrier free Ontario by 2025. This corporate plan is meant to continue to build on past progress and accomplishments and to lay the foundation for the development of new accessibility standards under the AODA (2005).

The purpose of the more expansive AODA legislation is to develop, implement and enforce standards of accessibility for all Ontarians. The standards under this Act include the areas of:

- Customer Service (i.e. services to the public; could include business practices and employee training)
- Built Environment ( i.e. access to, from and within buildings; could include counter heights, aisle/door widths, parking, signs, safety features such as flashing alarms)
- Employment (i.e. hiring and retention of employees)
- Communications and information (i.e. materials and tools such as publications, software applications and web sites)<sup>1</sup>

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<sup>1</sup> A Guide to Multi-year Accessibility Planning, under the Accessibility for Ontarians with Disabilities Act, 2005.

Retrieved from:

[http://www.mcsc.gov.on.ca/documents/en/mcsc/accessibility/iasr\\_guides/plan\\_50\\_en.pdf](http://www.mcsc.gov.on.ca/documents/en/mcsc/accessibility/iasr_guides/plan_50_en.pdf)

The AODA adopts the broad definition for disability that is set out in the *Ontario Human Rights Code*. "Disability" is:

- a. any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- b. a condition of mental impairment or a developmental disability,
- c. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d. a mental disorder, or
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.<sup>2</sup>

## Barriers

*What is a barrier?*

A "barrier" is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an informational or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.<sup>3</sup>

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<sup>2</sup> Workplace Safety and Insurance Act, 2005. Retrieved from:

[http://www.e-laws.gov.on.ca/html/regs/english/elaws\\_regs\\_980175\\_e.htm](http://www.e-laws.gov.on.ca/html/regs/english/elaws_regs_980175_e.htm)

<sup>3</sup> A Guide to Multi-year Accessibility Planning, under the Accessibility for Ontarians with Disabilities Act, 2005.

Retrieved from:

[http://www.mcass.gov.on.ca/documents/en/mcass/accessibility/iasr\\_guides/plan\\_50\\_en.pdf](http://www.mcass.gov.on.ca/documents/en/mcass/accessibility/iasr_guides/plan_50_en.pdf)

## Our Mission, Vision and Values

### Mission

To serve clients and community through:

- Providing superior and expanding services to clients;
- Delivering financial value to clients;
- Maximizing the effectiveness of our businesses systems; and
- Attracting and retaining employees who are driven to serve.

### Vision

We take pride in our work and believe in the importance of having strong values to guide our actions.

### Values

- **Respect:** We consistently demonstrate through words and actions our belief in the inherent value and dignity of every person with whom we come in contact.
- **Honesty:** We communicate openly with honesty and believe that acting with integrity is always the right choice.
- **Customer Service:** We consistently work to satisfy our customers' needs and seek creative ways of exceeding their expectations.
- **Teamwork:** We work collaboratively in a relationship-centred environment acknowledging that we achieve success together.
- **Compassion:** We are sensitive to the needs and feelings of others and strive for fairness and equality in all we do.

## Barrier Identification Methodology

Our leadership team and their managers have been canvassed to provide feedback regarding the identification of barriers and strategies to address them. This will include all locations. Reviews from the parking lots of each location to the back door will be considered. We will be updating the plan as information is provided.

Methodology	Description	Status
Reviewing feedback from our staff and visitors/customers via the website	As we receive feedback from our staff and our visitors/customers, all will be considered and acted upon if required.	Ongoing throughout the year.
Canvassing Leadership and management.	Members identified actual and potential barriers and sought follow up from the most responsible department.	Barriers identified, measures taken to mitigate or remove. This has contributed to the current accessibility plan.

## AODA Standards Education Plan 2012-2014

Standard	Affected	Education Modality
Information & Communications	All staff including managers	<b>All staff</b> – e-learning – propose to re-issue existing Customer Service content
Information & Communications	All staff including managers	<b>New policy in effect as of January 1, 2012.</b> Employee portal and on external facing website
Employment	All staff including managers	<b>All staff</b> – e-learning as above  Will include some information on the Human Rights Code

### Proposed Timeline

January 2012	New policy confirmed by President and HR
August 2014	Pilot of e-learning content HR (draft)
November 2014	E-learning completed and implemented available to learners
December 2014	All staff trained on AODA e-learning module

### e-learning

- All new staff assigned e-learning as part of onboarding process with completion within 1 month of start
- All existing staff assigned centrally, with completion date of December 31, 2014

### Handbook

- Available on employee portal
- All new staff receive handbook orientation upon assignment of e-learning and other reading materials distributed.

## Learning Objectives

Standard	Applicable Learning Objectives
<b>Information &amp; Communications</b>	<ul style="list-style-type: none"> <li>• Identify various disabilities (from Customer Service Standard e-learning)</li> <li>• Describe resources available to support people with disabilities, especially those specific to MSS (from standard e-learning)</li> <li>• Discuss what constitutes an exemption and what flexibility is allowed</li> <li>• Identify how a person with a disability can provide feedback</li> </ul>
<b>Employment</b>	<ul style="list-style-type: none"> <li>• Identify the underlying principles based on the Ontario Human Rights Code</li> <li>• Describe how standards will impact recruitment, career planning and performance development processes on a staff and manager basis</li> <li>• Discuss what work accommodation is and what it means for staff, managers and others</li> <li>• Define what an accommodation plan is and what it contains (including emergency preparedness information)</li> <li>• Discuss how an individual staff member can request an accommodation plan</li> </ul>

## Barriers and Opportunities Addressed in 2010-2014

Description of Barrier	Action Plan
<b>Physical and Architectural</b>	
Accessible Washrooms	Designated accessible washroom retrofitted in all locations
Accessible parking spot	Designated accessible parking spots in all locations
Accessible entrance	Accessible entrance of remote doors has been installed in both the Limeridge and Burlington location Hamilton location has a ramp installed

<b>Informational and Communication</b>	
No Website or employee portal available to our customers to provide information	Creation of website with 3 <sup>rd</sup> party. Accessibility options updated as required by code or before. Any compliance pre-requisitions created at source.
Ensure internet and intranet websites and web content conform to WCAG 2.0 guidelines (Web Content Accessibility Guidelines) at the following levels: New websites and web content to Level A by January 1, 2014 (14.4)	<ul style="list-style-type: none"> <li>• Internet and Intranet meets technical requirements of WCAG 2.0 on required schedule</li> <li>• This applies to websites and web content that an organization controls directly or through a contractual relationship that allows for modification of the product</li> <li>• This applies to web content published on a website after January 1, 2012</li> <li>• Currently able to adjust font size for those who are visually impaired</li> </ul>
Provide emergency procedure and public safety information in accessible formats or with communication supports as soon as practicable, upon request	<ul style="list-style-type: none"> <li>• Notice given by posting on website</li> </ul>
<b>Accessibility Standards for Customer Service</b>	
Establish policies, practises and procedures Make policy documents publicly available	<ul style="list-style-type: none"> <li>• Establish policies, practises and procedures governing the provision of its goods or services to persons with disabilities</li> <li>• Make reasonable efforts to ensure the above follow principles in regulations</li> <li>• Policy must deal with use of assisted devices</li> <li>• Document the above and upon request shall provide a copy of documentation to any person, post on website</li> <li>• Written policy documents are made publicly available and in accessible format upon request</li> </ul>
Use of animals and support persons to members of the public or other third parties	<ul style="list-style-type: none"> <li>• Ensure access to premises if accompanied by guide dog or other service animal or if accompanied by a support person</li> <li>• Document the above and upon request shall provide a copy of documentation to any person</li> <li>• Embed in policy</li> </ul>
Provide notice of disruption	<ul style="list-style-type: none"> <li>• In notice of disruption, include reason, anticipated duration</li> <li>• Post in a conspicuous place on premises</li> </ul>



<p>Training about the provision of goods or services to persons with disabilities</p>	<ul style="list-style-type: none"> <li>• Provide training to every person who deals with members of the public or other third parties on behalf of the provider</li> <li>• Training to include how to interact and communicate with persons with various disabilities, including those who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person; 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 disability</li> <li>• Training provided as soon as practicable after assigning applicable duties</li> <li>• Training provided on an ongoing basis with changes to the policies, practises and procedures</li> <li>• keep records of the training provided, including dates on which the training is provided and number of individuals to whom its provided</li> <li>• Document training policy including a summary of the contents of the training and details of when the training is to be provided</li> </ul>
<p>Establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and make available to the public</p>	<ul style="list-style-type: none"> <li>• Establish process permitting persons to provide their feedback in person, by telephone, in writing, email, on diskette or otherwise</li> <li>• Process to included actions to be taken if complaint is received</li> <li>• Document the process and upon request shall provide a copy of documentation to</li> </ul>
<p>Notify persons to whom MSSSI provides services that the documentation required by this regulation are available upon request</p>	<ul style="list-style-type: none"> <li>• Notice may be given by posting on website</li> </ul>
<p>Documents requested take into account the person’s disabilities</p>	<ul style="list-style-type: none"> <li>• The provider of the goods and services and the person with the disability may agree upon the format to be used for the document or information</li> <li>• Post on internet</li> </ul>
<p>Report Accessibility Standard for Customer Service Plan</p>	<ul style="list-style-type: none"> <li>• Complete compliance report</li> </ul>

Establish multi-year accessibility plan	<ul style="list-style-type: none"> <li>• A multi-year accessibility plan outlining strategy to identify, remove and prevent barriers and meet requirements of IASR is established, implemented, maintained and documented</li> <li>• The accessibility plan is posted on website and provided in an accessible format upon request</li> <li>• Plan is reviewed and updated at least once every 5 years</li> </ul>
Provide training on IASR accessibility standards and Human Rights Code	<ul style="list-style-type: none"> <li>• All employees, volunteers, persons participating in development of organizational policy and other persons who provide goods, services or facilities on behalf of the organization, receive training</li> </ul>
<b>Employment Standards</b>	
Must notify prospective internal and external job applicants that accommodations for applicants with disabilities will be provided on request.	<ul style="list-style-type: none"> <li>• To address by adding new language to our job posting templates.</li> </ul> <p>Text added: required statement for acceptance by applicant for all job submissions :</p> <p>MSS is an equal opportunity employer and we will accommodate your needs under the Canadian Charter of Rights and Freedom, Accessibility for Ontarians with Disabilities Act and the Ontario Human Rights Code. Hiring processes will be modified to remove barriers to accommodate those with disabilities, if requested. Should any applicant require accommodation through the application or interview processes, please contact Human Resources 905-388-2117 for assistance.</p>

## Barriers and Opportunities Identified to be addressed in 2015-2019

Description of Barrier	Action Plan
<b>Information and Communication Standards</b>	
All websites and web content to Level AA by January 1, 2021 (other than live captions and audio descriptions) (14.4)	Upgrades considered making the site accessible by eReaders as well as other disability-related features to be upgraded by third party source as implemented.
<b>Employment Standards</b>	
Notify successful applicants of its company's policies for accommodation upon onboarding.	The revised Accommodation policy will be included in the new Onboarding process in the required Organization Policy review/sign off section. Step within the Onboarding process. Will address policy sign off/review and are required to be acknowledged by signature.
Upon receiving a request for accommodation, all Leaders/Managers must consult with the employee to provide job-related or other workplace information in accessible formats.	Accommodation Plan may be provided to meet an employee's accessibility needs, if required (i.e. audio, large print, etc).
Large employers must document an employee's RTW process and include the details in the employee's individual accommodation plan.	<p>Workplace Accommodation Policy addresses this requirement by:</p> <p>the Work Accommodation Protocol determines the factors to be taken into consideration in the development of the Work Accommodation plan including:</p> <ul style="list-style-type: none"> <li>• The work accommodation must be suitable (safe, meaningful and consistent with the employee's functional abilities)</li> <li>• The work accommodation should be provided in a manner that respects the dignity of the person</li> <li>• There is no compromise to their own, coworker or patient safety as a result of the work accommodation</li> </ul> <p>3.1.8. of the policy requires that all work accommodation programs be documented with clear review and end dates established in advance as determined in the RTW meeting by all participants.</p>

<p>Employer that uses performance management should take into account the accessibility needs of their employees with disabilities.</p> <p>Performance management means activities related to assessing and improving employee performance, productivity, and effectiveness, with the goal of facilitating employee success.</p>	<p>Have incorporated adding accommodation language into existing performance management process called “Talk Performance Management” that is available on the intranet to all staff:</p> <p>Will be amending the following documents:</p> <ul style="list-style-type: none"><li>•Read me first</li><li>•Manager FAQ section</li></ul>
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# Mohawk Shared Services Plan for Web Accessibility

## Overview

The following is a breakdown of Mohawk Shared Services (MSS) plan for meeting and maintaining the accessibility standards for external and internal websites as determined by the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and [Web Content Accessibility Guidelines](#) (WCAG).

## Legal Responsibilities

MSS falls under the definition of public sector organizations, businesses and non-profit organizations (50+ staff). With this classification, we are required to meet the following accessibility standards on the associated timelines.

- 2014 New public websites and web content must conform with WCAG 2.0 Level A.
- 2021 All public websites and web content posted after January 1, 2012, must conform with WCAG 2.0 Level AA other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).

In regards to the 2014 deadline, MSS has been working closely with our third party website provider to ensure that any sites currently in development will meet these standards. You will notice, our website conforms to WCAG 2.0 Level AA standards.

In the meantime, MSS has been working with our vendor eSolutions to assess the current state of our external website.

Together we have drafted an initial document to redesign this site with the following criteria

- a) Strict conformation to WCAG 2.0 Level AA standards
- b) A portable design template that will allow for ALL external facing CMS-based sites to meet these same standards

A second phase of our plan is already in the initial discussion phase, that being the redressing of our intranet (Corp web). This site will also be examined and either have a similarly new template drawn up to meet WCAG 2.0 Level AA standards or potentially replaced with another CMS system such as Sharepoint.

## Associated Issue: Posting of Documents to the Web

In addition to making websites compliant to AODA standards, there is the related issue of making documents posted on the web equally accessible.

There are set steps recommended by WC3 to ensure documents are fully accessible and even offer step-by-step instructions for staff as they prepare documents for posting. These steps are available on this website: [http://www.doi.gov/ocio/information\\_management/upload/Guide\\_for\\_Creating\\_Accessible\\_Document\\_s.pdf](http://www.doi.gov/ocio/information_management/upload/Guide_for_Creating_Accessible_Document_s.pdf)

Implementing these guidelines will require staff education. This document will not only be made available on our employee intranet portal, but also a highly visible cue on the homepage of the site alerting customers and staff to the

need for and location of this document.

## **Our Commitment**

MSS will not wait until 2021 to implement immediate needs over the next 5 years and act proactively to meet these standards and exceed them. In addition, MSS will work to continually assess its web sites and content to ensure compliance is ongoing with their third party vendor.

## **Planning for AODA Legislation and Multi-Year Plan**

A committee will complete and follow process in place within MSS with the mandate to assure the requirements are met under the Accessibility for Ontarians with a Disability Act (AODA 2005). The committee includes representation from Human Resources, Corporate Health and Safety, Management, and other designated employees to develop and monitor MSS' multi-year plan. This committee will establish working groups to address the requirements and oversee the implementation of the standards of the AODA, while providing leadership and oversight.

## **Communication of the Plan**

Mohawk Shared Services Accessibility Plan will be posted on the MSS web site.

The plan is posted on the company website ([www.mohawkssi.com](http://www.mohawkssi.com)) in screen and audio reader compatible formats.

## **Review and Monitoring Process**

Human Resources and the Corporate Health and Safety Specialist (and other implementation specialists at each location) will be responsible for ongoing monitoring and review of the implementation of improvements to provide enhanced service and access to persons with a disability. They, as a committee, will also be responsible for approving corporate accessibility policies, procedures and communication materials as developed by the working groups.

## **Related Policies:**

- Accessibility Policy

A copy of these policies is available on our website ([www.mohawkssi.com](http://www.mohawkssi.com))