

# Multi-Year Accessibility Plan

## Our Accessibility Commitment

ANTIBODY Healthcare Communications is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We are committed to meeting the needs of people with disabilities in a timely manner.

## Introduction

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA) with the goal of ensuring greater accessibility for Ontarians with disabilities by 2025. To help public, private, and non-profit organizations identify, prevent, and remove barriers to accessibility, the AODA contains accessibility standards in areas, including:

- Customer service
- Information and communications
- Employment
- Transportation
- Built environment

The accessibility standard for customer service came into force in 2008. The next three standards, information and communications, employment, and transportation have been combined into the Integrated Accessibility Standards Regulations (IASR). The IASR is now law and the requirements will be phased in over time. The standard for the built environment for facilities and outdoor spaces is still in development.

This Multi-Year Accessibility Plan (Accessibility Plan) outlines ANTIBODY Healthcare Communications' compliance with the AODA, sets out ANTIBODY Healthcare Communications' upcoming and on-going obligations pursuant to the AODA, and identifies how ANTIBODY Healthcare Communications will meet those obligations. ANTIBODY Healthcare Communications is committed to fulfilling our requirements under the AODA and making its premises and services accessible to all Ontarians.

## **Customer Service**

ANTIBODY Healthcare Communications strives at all times to provide goods and services in a way that respects the dignity and independence of persons with disabilities. ANTIBODY Healthcare Communications is also committed to giving people with disabilities the same opportunity to access our goods and services and allowing them to benefit from the same services, in the same place and in a similar way as other customers.

### **Ongoing Initiatives**

- Continue to provide training on customer service to all new employees who interact with the general public and third party vendors using the Government of Ontario's "Serve-Ability" site.
- Review and update policies and standards regularly to ensure high quality, accessible customer service.
- Consult with key stakeholders and advisory groups on emerging or changing requirements.
- Review all customer feedback and take appropriate action.
- Continue to implement service disruption protocol by posting signs to advise the public where alternate service may be obtained, while repairs to existing service location are completed.

## **Integrated Accessibility Standards Regulation (IASR)**

### **Part 1 (General)**

ANTIBODY Healthcare Communications' Accessibility policy affirms its commitment to meeting the accessibility needs of persons with disabilities in a timely manner and governs the way that ANTIBODY Healthcare Communications will achieve accessibility. ANTIBODY Healthcare Communications has created this Multi-Year Accessibility Plan outlining the Company's phased-in strategy for identifying, removing and preventing barriers to accessibility. The plan will be posted on our corporate website and will be provided in alternate formats upon request. Once all AODA initiatives have been met, the plan will be reviewed and updated at least once every five years.

### **Ongoing Initiatives**

#### **Training**

- The Learning and Development group has been made aware of the training initiative for all employees to be trained 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.
- An in-house training course will be implemented by January 1, 2015.
- All Ontario based employees will be trained and a record will be kept of the training.
- New employees will be trained as part of their on-boarding.

### **Part 2 (Information and Communications)**

ANTIBODY Healthcare Communications will follow best practices when developing, implementing, and maintaining information and communications strategies and products to ensure that information and communications are available and accessible to people with disabilities. This includes websites, intranet sites, communication materials, telephone communications and face-to-face interactions. The goal is to achieve the most effective and efficient access to information for all users.

### **Ongoing Initiatives**

#### **Feedback**

- Conduct a review of all feedback processes across the organization (internally and externally).
- Determine what accessible formats and communication supports will be provided upon request.
- Notify the public about the availability of these accessible formats and communication supports.
- Complete this initiative by January 1, 2015.

### Accessible Formats and Communication Supports

- Upon request, provide or arrange for information in accessible formats and/or provide communication supports for people with disabilities.
- Ensure that the information is provided in a timely manner, at no extra cost, and that the person making the request is consulted in order to determine the most appropriate format or support.
- Train all staff in the availability of communications in accessible formats
- Complete this initiative by January 1, 2016

### Accessible Websites and Web Content

- Ensure that all new websites and web content comply with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to Level AA.
- Conduct an assessment of the company's website and testing for accessibility.
- A course of action and timelines needed to achieve web accessibility will be outlined, based on the results of the assessment and compliance with the law
- Complete this initiative by January 1, 2021

## **Part 3 (Employment Standards)**

ANTIBODY Healthcare Communications is committed to inclusive and accessible employment practices that attract and retain talented employees with disabilities.

### Ongoing Initiatives

#### Evaluation and Review of Barriers

- ANTIBODY Healthcare Communications will review existing recruitment and employment practices and identify potential barriers to employment, including without limitation:

- \* Methodology of advising of potential job opportunities
- \* Identification of barriers that may arise during the interview process

#### Recruitment, Assessment or Selection Process

- During the recruitment process, job applicants who are selected for assessments or interviews will be informed that accommodations are available upon request in relation to materials or processes to be used.
- Applicants requesting accommodation will be consulted with in order to provide suitable accommodation that takes into account the applicant's accessibility needs.
- Creating systems to reduce or eliminate biases in recruitment processes (selection criteria, interview methodology)
- **Complete this initiative by January 1, 2016**

#### Notice to Successful Applicants

- Successful applicants will be notified of policies for accommodating employees with disabilities when offering employment. This notice will be included in the letter of offer to the successful applicant.
- **Complete this initiative by January 1, 2016**

#### Informing Employees of Supports

- All employees will be informed notified of policies for supporting employees with disabilities, including providing employment-related accommodations.
- New employees will receive this information during the orientation process.
- All employees will be given updated information whenever there is a change to existing policies on the provision of job accommodations.
- Employees will be assured that their privacy is respected and that any sharing of information about their accommodation needs will be discussed with them and plans for communication made with their consent.
- Create posters and intranet postings on "how to request accommodation" to remind employees of the availability of accommodation.

- Ensure that any updates to the accommodation policy is circulated to all employees through orientation, training and employee intranet.
- **Complete this initiative by January 1, 2016**

#### Accessible Formats and Communication Supports for Employees

- Employees with disabilities will be consulted in order to provide them with the accessible formats and communication supports they require to do their jobs effectively.
- Complete this initiative by January 1, 2016

#### Documented Individual Accommodation Plans

- Written accommodation plans will be written for employees with disabilities indicating:
  1. How an employee requesting accommodation can participate in the development of their individual accommodation plan.
  2. How the employee will be assessed on an individual basis.
  3. How ANTIBODY Healthcare Communications can request an evaluation by an outside medical or other expert, at the employer's expense, to assist them in determining if and how accommodation can be achieved.
  4. How the employee can request the participation of a representative from the workplace in the development of the accommodation plan.
  5. The steps taken to protect the privacy of the employee's personal information.
  6. The frequency and manner in which the individual accommodation plan will be reviewed and updated.
  7. If an individual accommodation plan is denied, how the reasons for the denial will be provided to the employee.
  8. How the individual accommodation plans will be documented taking into account the employee's accessibility needs due to disability.

All accommodation plans are private. Each plan will include information on accessible formats and communication supports required, individual emergency response requirements and any other accommodation needed. Employees will be trained on the duty to accommodate, the accommodation process, how to support the accommodation process and how to access information and assistance.

- Complete this initiative by January 1, 2016

#### Return to Work

- ANTIBODY Healthcare Communications does have a return to work process that is currently being documented in consultation with Human Resources, Sedgwick, and ANTIBODY Healthcare Communications Benefits.
- The return to work process will document that steps the employer will take to facilitate the return to work of employees who are away from work due to disability
- The return to work process will implement a method of determining the essential job tasks or job functions and determining the method of accommodating the employee so that the employee can perform the essential duties of the position (with or without accommodation as the situation may arise).
- A process will be put in place to ensure that managers understand the accommodations being made as well as the privacy/communication concerns and agreements around the return to work accessibility requirements.
- The return to work policy shall confirm that an individual documented accommodation plan (see above) may be implemented to facilitate the return to work process.
- Complete this initiative by January 1, 2016

### Performance Management

- The accessibility needs of employees with disabilities will be taken into account with regards to performance management, including performance plans in accessible formats.
- A review of the existing performance management process is to be conducted in order to ensure that accessibility is built into the process.
- Complete this initiative by January 1, 2016

### Career Development and Advancement

- The accessibility needs of employees with disabilities will be taken into account with regards to career development and advancement, including coaching and feedback.
- A review of the existing career development and advancement process is to be conducted in order to ensure that accessibility is built into the process.
- Complete this initiative by January 1, 2016

### Redeployment

- The accessibility needs and individual accommodation plans of employees with disabilities will be taken into account when they are reassigned to other departments or jobs within ANTIBODY Healthcare Communications.
- Complete this initiative by January 1, 2016

### **Contact Information**

If you have questions on this policy or want to provide feedback, please contact:

Nadine Lavoie

nadine.lavoie@dentsubos.com

416.762.7650

# **Customer Service Policy under the Accessibility for Ontarians with Disabilities Act**

## **POLICY STATEMENT**

The Company is committed to providing an accessible and inclusive environment in which all persons have equal access to its goods and services as required by the Accessibility Standards for Customer Service, O. Regulation 429/07 ("ASCS") made under the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA").

The Company will take steps to ensure that any person with a disability who visits the premises of the Company or who accesses the Company's goods and services will be able to do so in a manner that respects dignity and independence.

The Company will make every reasonable effort to ensure that its policies, practices and procedures respecting the provision of accessible customer service will be consistent with the principles of independence.

The Company is open to feedback and looks forward to improving its environment for all persons, including persons with disabilities.

## **SCOPE & APPLICABILITY**

This Policy applies to all employees and/or agents who work for the Company and provide goods and services to members of the public and/or third parties on behalf of the Company. This Policy applies to persons with disabilities who access the Company's goods and services or premises.

### **Service Animals**

Service animals are permitted on the Company's premises that are open to guests and visitors and the animal is not otherwise excluded by law. It is the responsibility of the person using the service animal to keep control of the animal at all times.

Where it is not readily apparent that an animal is a service animal, an employee may make a polite inquiry to confirm that the animal is a service animal and to request documentary confirmation of same, such as a doctor's note, confirming the need for a service animal.

A service animal may be removed from the premises where its conduct poses a threat to the safety and well-being of others. If an employee or the Company's customer is allergic to service animals, alternative arrangements will be negotiated and instituted.

### **Support Persons**

Persons with disabilities are welcome to bring a support person to assist them in any Company premise that is open to guests and visitors.

### **Use of Assistive Devices**

Persons with assistive devices are entitled to use personal assistive devices while accessing any of the Company's goods and services or premises. There is a broad range of assistive devices, including white canes, computers/laptops, and communications devices.

### **Privacy**

Persons with disabilities are entitled to confidentiality and the protection of their privacy. Persons with disabilities and are not required to disclose to employees of the Company information about the nature of their disability, unless specifically needed to better accommodate the needs of the person with disabilities.

### **Confidentiality**

Confidentiality and privacy of the person with a disability will be respected at all times by the Company's employees.

### **NOTICE OF TEMPORARY DISRUPTIONS**

If there is a temporary disruption of facilities or goods and services that persons with disabilities usually use to access the Company's goods and services, the Company will use all reasonable means to give notice of the disruption to the public and give ideas of alternate ways of accessing the location.

Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or goods and services. Notice will be given by posting the information in a conspicuous place on the Company's premises or by posting it on the Company's website. Disruptions to all of the Company's goods and services, such as during a power outage, does not require notice.

Where an employee knows that a person with a disability intends to attend at Company premises and may be impacted by a temporary disruption, the employee will also attempt to contact the specific individual to advise of the disruption and to discuss possible alternate ways of accessing the location or offering to reschedule or relocate the visit.

Servicing of elevators is the responsibility of the respective property management companies, and as such, they would be required to ensure that notice of temporary disruptions to elevator service is provided as required by the ASCS. If all elevators to access the Company's premises are out of service, the Company will assess the situation and determine whether notice needs to be provided to members of the public and/or third parties that could reasonably be expected to access the Company's premises.

### **TRAINING**

The Company is committed to ensure that its existing and new employees receive training on this policy on a regular basis. Our training will include:

- The purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- An overview of the requirements of the Accessibility Standards for Customer Service
- Instruction on the Company's internal policies and procedures
- Instruction on how to interact and communicate appropriately with persons with various types of disabilities;
- Instruction on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person (including appropriate and inappropriate methods of interaction);
- How to locate the assistive devices at the Company's premises and a description of alternative methods of service provision used at the Company that may help with the provision of goods and services to people with disabilities;
- What to do if a person with a disability is having difficulty in accessing the Company's goods and services;

- How to deal with feedback and complaints, including internal escalation of the feedback or complaint, as appropriate.

### **Questions/Inquiries/Complaints/Feedback**

The Company prides itself on being accessible to all its customers. If anyone has feedback or a concern about accessibility issues or the application of this policy, they can contact:

Nadine Lavoie

By telephone (416.642.7650)

By email to [nadine.lavoie@dentsubos.com](mailto:nadine.lavoie@dentsubos.com)

The Company will promptly investigate all complaints and is committed to taking appropriate actions if there is a failure to abide by this policy. The Company also welcomes general feedback on how our locations can be more accessible to persons with disabilities.