



Accessibility Policy and Multi-Year Accessibility Plan

STATEMENT OF COMMITMENT

Legacy is committed to providing a respectful, welcoming, accessible and inclusive environment for all persons with disabilities in a way that is respectful of the dignity and independence of persons with disabilities and in a manner that takes into account the person's disability. Legacy will do so in a manner that embodies the principles of integration and equal opportunity and access.

Legacy is committed to becoming a barrier free environment and meeting the requirements of all existing legislation, regulations, and its own policies and goals related to identifying, removing and preventing barriers to people with disabilities that might interfere with their ability to interact with the Company. The Company is also committed to ensuring that its duties and obligations under Ontario's legislation and regulations are observed in a timely fashion.

This Multi-Year Accessibility Plan outlines the steps Legacy will take to further improve opportunities for people with disabilities and to comply with the remaining requirements of the Act.

DEFINITIONS

"accessible format" – includes, but is not limited to, large print, recorded audio and other electronic formats, braille, and other formats used by persons with disabilities.

"assistive device" – is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of a person with a disability.

"barrier" – means anything that prevents a person with a disability from fully participating due to the nature of his or her disability. This includes:

- a physical barrier;
- an architectural barrier;
- an information or communications barrier;
- an attitudinal barrier;
- a technological barrier; or
- a Company policy or practice.

“communications supports” – includes, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

“disability” - means,

(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*.

Barrier Assessment

In accordance with the *Accessibility for Ontarians with Disabilities Act, 2005* (“AODA”), and Legacy’s goal of providing an inclusive workplace, this Multi-Year Accessibility Plan seeks to eliminate and prevent barriers to accessibility. Typical barriers experienced by individuals with disabilities include physical, communication and technology, attitudinal and systemic barriers.

Accessible Emergency Information

Legacy is committed to providing its customers with publicly available emergency information, in an accessible way, upon request. Legacy will also provide disabled employees with individualized emergency response information when necessary.

Implementation Timeframe:

Effective immediately and ongoing.

Training

Legacy will provide training to employees, volunteers and other staff members on Ontario’s accessibility laws and on the *Human Rights Code* (hereinafter “the Code”) as it relates to people

with disabilities. Training will be provided in a way that best suits the duties of Legacy's employees and volunteers.

Legacy will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws:

- Legacy will review current training materials to determine whether any existing training materials can be built upon and used for AODA training;
- Legacy will provide Customer Service Training for all employees who deal with members of the public and/or any other third parties (as required by section 6 of the Customer Service Standard, O. Reg. 429/07);
- Legacy training for all employees will explain: (1) the requirements of the Accessibility Standards referred to in the Integrated Standard, O. Reg 119/11; and (2) the requirements of the *Code* as it pertains to persons with disabilities (as required by section 7 of the Integrated Standard, O. Reg 119/11);
- Legacy will provide accessibility training in the form of a training presentation;
- Legacy will provide an accessibility training booklet for new Legacy employees;
- Legacy will also determine a mechanism for managing and tracking the completion of training by Legacy's Ontario employees.

Implementation Timeframe:

By January 1, 2015 and ongoing.

Kiosks

Legacy will take the following steps to ensure employees consider the needs of people with disabilities when designing, procuring or acquiring self-service kiosks:

- The Legacy **Human Resources department** will be consulted and trained on considering the needs of people with disabilities when designing, procuring or acquiring self-service kiosks.
- Legacy's IT department will be consulted to ensure that any existing and new self-service kiosks are altered to consider the needs of people with disabilities. This is to ensure effective communication methods are provided to people with disabilities at self-service kiosks.
- When procuring self-service kiosks, accessibility features will be incorporated into the procurement process.
- Employees will be trained to assist individuals with accessibility features on all self-service kiosks.

Information and Communications

Legacy is committed to meeting the communication needs of people with disabilities. We will consult with disabled customers to determine their specific information and communication needs.

Legacy will take the following steps to make sure all publicly available information is made accessible upon request by **January 1, 2016**:

- Legacy will provide customers with information in an accessible format, upon request; and,
- Legacy will respond to such requests as soon as practicable.

If Legacy develops a new website between **January 1, 2014 and January 1, 2021**, it will ensure that the new website or any new web content conforms with WCAG 2.0, Level A.

Legacy will take the following steps to make any new website and new web content conform with WCAG 2.0, Level A by **January 1, 2015**:

- all new Legacy websites will be assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A;
- all new Legacy web content will be assessed and evaluated for accessibility conformance;
- if conformance with WCAG 2.0 Level A is an issue, Legacy will consult with its internal IT department/an external consultant regarding necessary changes to its new website and new web content so as to come into compliance;
- Legacy will engage services of an external website consultant to implement improvements to its website and web content so as to meet the compliance standards, if its internal IT department is unable to do so;
- Legacy will review any changes to ensure compliance;
- Our internet and intranet websites, technology solutions, communications materials, telephone communications and in-person interactions will be based on accessibility-best practices.

Legacy will take the following steps to make any public website and web content conform with WCAG 2.0, Level AA by **January 1, 2021**:

- Legacy's public website will be assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A;

- all Legacy public web content will be assessed and evaluated for accessibility conformance;
- if not in conformance with WCAG 2.0 Level A, Legacy will consult with its internal IT department/an external consultant regarding necessary changes to bring to the website and web content into compliance;
- engage services of an external website consultant to make improvements of the website and web content, if its internal IT department is unable to make the necessary changes;
- implement necessary improvements to the website and content will be made and revised by Legacy to ensure compliance.

Implementation Timeframe:

By January 1, 2014 and ongoing.

Feedback

Legacy will take the following steps to make ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2015**:

- advise customers that feedback can be given in person, by mail, by phone, or by e-mail to:

Address: Legacy SCS – AODA: 1 Kenview Blvd. Unit #210 Brampton ON L6T 5E6

Telephone: 905-494-4955

E-mail: AODA-Response@Legacyscs.com

- ensure public that supports are available to facilitate the submission of feedback; and,
- commit to responding to feedback as soon as practicable.

Employment

Legacy is committed to fair and accessible employment practices.

Legacy will take the following steps by **January 1, 2016** to notify the public and its employees that it will accommodate individuals with disabilities during the recruitment, assessment and hiring process:

- include a statement in any job advertisements/postings that Legacy will hire individuals with disabilities and will provide accommodations during the recruitment process;
- if a job applicant requests accommodation, Legacy will consult with the individual and make adjustments that best suit his/her needs to the extent required by law;

- confirm, in any interview, that Legacy will hire individuals with disabilities;
- notify successful applicants of Legacy’s policies for accommodating employees with disabilities in its offer letter;
- include in the Legacy “New Hire Orientation” training program a section on accessibility and the *Human Rights Code*, as appropriate;
- advise current employees of the policies on accessibility and the *Human Rights Code*;
- advise employees when any changes are made to the above policies; and,
- review existing policies and procedures and where necessary, augment processes for people with disabilities.

Legacy will develop and put in place a process for designing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability.

Legacy will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if Legacy is using performance management, career development and redeployment processes:

- review existing policies and procedures (and if necessary, augment processes for people with disabilities).

Legacy will take the following steps to prevent and remove other accessibility barriers identified:

- assess, review, and alter (if required) policies and procedures to ensure compliance with the *AODA*.

Implementation Timeframe:

By January 1, 2016 and ongoing.

Design of Public Spaces

Legacy will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to its facilities in public spaces. Public spaces at Legacy include:

- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps and accessible pedestrian signals
- Accessible off street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas.

Implementation Timeframe:

By January 1, 2017 and ongoing.

Service Disruptions

In the event of a service disruption, Legacy will notify the public of the disruption in service and alternatives available.

Implementation Timeframe:

Effective immediately and ongoing.

Policy Review

The Multi-Year Accessibility Plan is a tool for Legacy to communicate its accessibility initiatives internally and to the public. Legacy will review and update this Plan annually to reflect Legacy's accomplishments in improving our services for those with disabilities and to maintain compliance with the IASR.

Implementation Timeframe:

By January 1, 2015 and ongoing.

For more information

For more information on this accessibility plan, please Human Resources at:

- Telephone: 905-494-4955
- Email: AODA-Response@Legacyscs.com