



Multi-Year Accessibility Plan

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Introduction

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA) with the intention to make the province of Ontario fully accessible by 2025. TrueContext strongly supports this important objective and is committed to improving opportunities for people with disabilities by preventing and removing barriers to accessibility.

This Multi-Year Accessibility Plan outlines the steps and actions that TrueContext has taken or will be taking to prevent, identify and remove barriers to people with disabilities that might interfere with their ability to interact with TrueContext. This plan is partial fulfillment of the obligations outlined under the Integrated Accessibility Standards (Ontario Regulation 191/11) (IASR).

Statement of Commitment

TrueContext is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

TrueContext is committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the AODA.

To obtain this document in an alternative format, please contact our AODA Compliance Officer by calling 613-800-7163, by emailing accessibility@truecontext.com or by mail at 250-2500 Solandt, Kanata, Ontario, Canada K2K 3G9.

Multi-Year Accessibility Plan

Integrated Accessibility Standards, ON Regulation 191/11

IASR Section	Obligation	Steps and Actions Taken or to be Taken	Status	Compliance Date
Part I: General Requirements				
3. Establishment of Accessibility Policies	Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements referred to in this Regulation. O. Reg. 191/11, s. 3 (1).	Accessibility policy and plan have been drafted and implemented.	Completed	December 31, 2014
4. Accessibility Plans	The Government of Ontario, Legislative Assembly, designated public sector organizations and large organizations shall, <ol style="list-style-type: none"> 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 regulations under this Regulation; b) post the accessibility plan on website, if any, and provide the plan in an accessible format upon request; and c) review and update the accessibility plan at least once every five years. O. Reg. 191/11, s. 4 (1).	Accessibility plan is updated on website to a more accessible format.	Completed	December 31, 2014 Revised December 31 2017 Revised December 6, 2023
6. Self-serve Kiosks	Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when	N/A	N/A	December 31, 2014

	designing, procuring or acquiring self-service kiosks. O. Reg. 191/11, s. 6 (2).			
7. Training	Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the <i>Human Rights Code</i> as it pertains to persons with disabilities to, <ol style="list-style-type: none"> 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 O. Reg. 191/11, s. 7 (1). 	Developed and implemented accessibility training.	Completed	September 30, 2015
Part II: Information and Communications Standards				
11. Feedback	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 the provision of accessible formats and communications supports, upon request. O. Reg. 191/11, s. 11 (1).	Accessibility feedback form posted on website.	Completed	September 30, 2015
12. Accessible Formats and Communication Supports	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,	On request, determine options for alternate formats required to support the person with a disability.	Completed	December 31, 2014

	<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. O. Reg. 191/11 s. 12 (1)</p>	Make arrangements for the provision in an accessible format.		
13. Emergency Procedure, Plans or Public Safety Information	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. O. Reg. 191/11, s. 13 (1).	Emergency procedures, plans and public safety information has been drafted and implemented.	Completed	December 31, 2014
14. Accessible Websites and Web Content	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. O. Reg. 191/11, s. 14 (2).	A new website was launched November 22, 2023. A WCAG 2.0 Level AA compliance audit on or before March 31, 2024 and periodic audits thereafter. Company will rectify deficiencies identified by company or in audits.	In Progress	In Progress
15. Educational and Training and Resources Materials	Every obligated organization that is an educational or training institution shall do the following, if notification of need is given:	N/A	N/A	December 31, 2012

	<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. 			
<p>16. Training to Educators</p>	<p>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</p>	<p>N/A</p>	<p>N/A</p>	<p>December 31, 2012</p>

	accessible program or course delivery and instruction. O. Reg. 191/11, s. 16 (1).			
17. Producers of Educational or Training Material	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. O. Reg. 191/11, s. 17 (1).	N/A	N/A	December 31, 2012
18. Libraries of Educational and Training Institutions	<p>Subject to subsection (2) and where available, the libraries of educational or 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. O. Reg. 191/11, s. 18 (1).</p> <p>Special collections, archival materials, rare books and donations are exempt from the requirements of subsection (1). O. Reg. 191/11, s. 18 (2).</p>	N/A	N/A	December 31, 2012
Part 3: Employment Standards				
22. Recruitment, General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. O. Reg. 191/11, s. 22.	Internal and external recruitment websites/posting will be updated to notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment process.	Completed	July 1, 2015

23. Recruitment, Assessment or Selection Process	<p>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. O. Reg. 191/11, s. 23 (1).</p> <p>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. O. Reg. 191/11, s. 23 (2).</p>	<p>A notice will be placed on external and internal recruitment websites/posting indicating the availability of accommodations upon request for potential candidates selected for assessment.</p>	<p>Completed</p>	<p>July 1, 2015</p>
24. Notice to Successful Applicants	<p>Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. O. Reg. 191/11, s. 24.</p>	<p>Offers of employment will include a statement notifying successful applicants of accommodation policies for employees with disabilities.</p>	<p>Completed</p>	<p>July 1, 2015</p>
25. Informing Employees of Supports	<p>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. O. Reg. 191/11, s. 25 (1).</p> <p>Employers shall provide the information required</p>	<p>Communication strategy implemented to inform employees of the policies for supporting employees with disabilities.</p>	<p>Completed</p>	<p>July 1, 2015</p>

	<p>under this section to new employees as soon as practicable after they begin their employment. O. Reg. 191/11, s. 25 (2).</p> <p>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. O. Reg. 191/11, s. 25 (3).</p>			
26. Accessible Formats and Communication Supports for Employees	<p>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,</p> <p>a) information that is needed in order to perform the employee's job; and</p> <p>b) information that is generally available to employees in the workplace. O. Reg. 191/11, s. 26 (1).</p>	<p>Ensure existing job accommodation process includes provisions for accessible formats and communications supports for information required by the employee.</p>	Completed	December 31, 2014
	<p>The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. O. Reg. 191/11, s. 26 (2).</p>	<p>Communicate with employees the availability of and process for requesting accessible formats and communication supports.</p>	Completed	July 31, 2015
27. Workplace Emergency Response Information	<p>Every employer shall provide individualized workplace emergency response information to</p>	<p>Implement a process for the development of individualized emergency response</p>	Completed	July 31, 2015

	<p>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. O. Reg. 191/11, s. 27 (1).</p> <p>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. O. Reg. 191/11, s. 27 (2).</p>	<p>plans for employees as required, and review set plan when reviewing general emergency response policies.</p>		
28. Documented Individual Accommodation Plans	<p>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. O. Reg. 191/11, s. 28 (1).</p>	<p>Review current process for employees requesting accommodation plans and ensure it is documented properly.</p>	Completed	July 31, 2015
29. Return to Work Process	<p>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</p>	<p>Review existing return to work process and ensure it accounts for employees who have been absent from work due to a disability, and includes applicable individual accommodation plans.</p>	Completed	July 31, 2015

	<p>order to return to work; and</p> <p>b) shall document the process. O. Reg. 191/11, s. 29 (1).</p> <p>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 documented individual accommodation plans, as described in section 28, as part of the process. O. Reg. 191/11, s. 29 (2).</p> <p>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. O. Reg. 191/11, s. 29 (3).</p>			
<p>30. Performance Management</p>	<p>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. O. Reg. 191/11, s. 30 (1).</p>	<p>The accessibility needs of employees with disabilities will be taken into account, as well as individual accommodation plans, in the performance management process.</p>	<p>Completed</p>	<p>December 31, 2017</p>

31. Career Development and Advancement	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. O. Reg. 191/11, s. 31 (1).	Ensure equal opportunity is offered to employees with disabilities, by taking their disabilities into account when considering their career development and advancement.	Completed	December 31, 2014
32. Redeployment	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. O. Reg. 191/11, s. 32	Ensure the accessibility needs of employees with disabilities and individual accommodation plans are taken into account when considering redeployment.	Completed	December 31, 2014
Part IV.2: Customer Service Standards				
80.46 Establishment of Policies	In addition to the requirements in section 3, every provider shall develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities. O. Reg. 165/16, s. 16.	Accessibility Standards for Customer Service Policy has been updated and implemented in accordance with the principles set out in this Section. The updated policy has been posted on the company's new website.	Completed	December 6, 2023
80.47 Use of Service Animals and Support Persons	If a person with a disability is accompanied by a guide dog or other service animal, the provider shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is	The requirement is set out in the updated Accessibility Standards for Customer Service Policy.	Completed	December 6, 2023

	otherwise excluded by law from the premises. O. Reg. 165/16, s. 16.			
80.48 Notice of Temporary Disruptions	If, in order to obtain, use or benefit from a provider's goods, services or facilities, persons with disabilities usually use other particular facilities or services of the provider and if there is a temporary disruption in those other facilities or services in whole or in part, the provider shall give notice of the disruption to the public. O. Reg. 165/16, s. 16.	The requirement is set out in the Accessibility Standards for Customer Service Policy.	Completed	December 6, 2023
80.49 Training for Staff	In addition to the requirements in section 7, every provider shall ensure that the following persons receive training about the provision of the provider's goods, services or facilities, as the case may be, to persons with disabilities: 1. Every person who is an employee of, or a volunteer with, the provider; 2. Every person who participates in developing the provider's policies; 3. Every other person who provides goods, services or facilities on behalf of the provider. O. Reg. 165/16, s. 16.	Training is to be provided, records kept, training policy described in the updated Accessibility Standards for Customer Service Policy and notice posted on the website in accordance with the requirements.	Completed	December 31, 2017
80.50 Feedback Process Required	Every provider shall establish a process for receiving and responding to, (a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and	Policy setting out the feedback process is drafted, implemented and posted on the new website.	Completed	December 31, 2017 Revised December 6, 2023

	(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3). O. Reg. 165/16, s. 16.			
80.51 Format of Documents	<p>If a provider is required by this Part to give a copy of a document to a person with a disability, the provider shall, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support, (a) in a timely manner that takes into account the person's accessibility needs due to disability; and (b) at a cost that is no more than the regular cost charged to other persons. O. Reg. 165/16, s. 16.</p> <p>(2) The provider shall consult with the person making the request in determining the suitability of an accessible format or communication support. O. Reg. 165/16, s. 16.</p>	Include in training of employees.	Completed	December 31, 2017

Revision History

Posting Date: December, 2017

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