



MULTI-YEAR ACCESSIBILITY PLAN (2014 – 2019)

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Organization Information

Trans Power will earn the respect, confidence and loyalty of our customers, suppliers and associates through leadership, continuous improvement and being the best in everything we do while evaluating new technologies to deliver cost effective solutions for our clients. Our power is our people.

Statement of Organizational Commitment

Trans Power strives to provide our products and services in a manner that is accessible to all of our customers, and respects the dignity and independence of people with disabilities. We are committed to offering equal opportunity access to our products and services, and to providing the benefit of the same services, in the same place and in a similar way, to all customers.

Trans Power is committed to the principles outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* and to meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the Act.

Accessibility Goals

Trans Power is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodations do not cause Trans Power undue hardship. As an organization, we are committed to the following accessibility goals:

- Ensuring that all of our services are performed in such a manner that they are respectful of the dignity and independence of persons with disabilities;
- Persons with disabilities will be given the same opportunities and services provided to other members of the public;
- Creating and providing information and communications in ways that are accessible to people with disabilities;
- Providing training to all individuals employed by Trans Power with regards to Accessible Customer Service Standards, AODA legislation and IASR requirements.
- Updating recruitment and selection strategies to remove barriers during the selection and assessment processes.
- As an employer, Trans Power will integrate accessibility into all of our regular workplace processes.



Meeting Our Accessibility Goals Going Forward

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including Trans Power, to ensure that their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

The IASR requires that every employer with 50 or more employees develops and posts a Multi-Year Accessibility Plan on their website by 2014. In accordance with the IASR, Trans Power's Multi-Year Accessibility plan outlines Trans Power's goals and milestones in relation to AODA from 2014 to 2019. It will be reviewed at minimum once every five years, and will be amended as required. This plan will be made publically available on our website in this format, as well as in alternative formats upon request.

Tran Power's Multi-Year Accessibility Plan was created in accordance with Section 4 of the *Integrated Accessibility Standards Regulation*, which requires organizations to establish, implement, maintain and document a multi-year accessibility plan by 2014. The objective of the Multi-Year Accessibility Plan is to support Trans Power's compliance with the AODA and the IASR requirements, as well as Trans Power's commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in respect, dignity and equal opportunity for all persons; our power is our people.

Accessibility Barriers

In accordance with Trans Power and the AODA's commitment to treating all people in a way that allows them to maintain their dignity and independence, our plan seeks to prevent and remove barriers to accessibility for persons with disabilities.

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. Typical barriers experienced by persons with disabilities include:

- Physical/Architectural Barriers: Design elements of a public space that cause problems for persons with disabilities.
- Attitudinal Barriers: Individual perceptions of, and reactions to, persons with disabilities.
- Communication: Situations or constructs that make it difficult for persons with disabilities to give, receive or understand information.
- Systemic: Organizational policies or practices that restrict the participation of persons with disabilities.
- Technological: Poor or inexistent technology system that can prevent persons with disabilities from accessing information.



Accessibility Successes

To date, we have achieved successes in the following areas:

- Provision of Emergency and Public Safety Information (01/01/2012)
 - Display public safety and emergency information and signage in conspicuous locations on premises owned and operated by Trans Power.
 - Provide detailed public safety and emergency policy information to the public upon request.

- Compliance with the *Accessible Customer Service Standards Regulation*. (01/01/2012)
 - Creation and Posting of Customer Service Policies and Procedures.
 - Providing customer service training to all individuals that deal with the public whom are employed by Trans Power.
 - Offering to provide communication accommodations based on individual needs.
 - Permitting clients with disabilities to use assistive devices on premises owned and operated by Trans Power.
 - Ensuring that all workplace policies and procedures respect and promote the dignity of people with disabilities.
 - Ensuring clients are provided with notice in the event of a planned or unexpected disruption in the facilities or services typically utilized by individuals with disabilities.
 - Creating and maintaining a feedback process to respond to any questions or comments regarding the manner in which Trans Power provides services to persons with disabilities.

- AODA Individual Emergency Evacuation Procedures (01/01/2012)
 - All existing and new employees in Ontario who require an individual workplace emergency response plan are provided with an individual plan that takes their disability into account.
 - All Trans Power employees in Ontario are made aware of the availability of individual emergency evacuation plans during the onboarding process.
 - Information on how to obtain individual emergency evacuation plans can be obtained by contacting the Human Resources Department.
 - Managers and supervisors responsible for oversight of Health and Safety matters to receive training and resources to understand how to complete, and when to complete, Individual Emergency Evacuation plans, as required.



Part 1: General Requirements

Initiative	IASR Requirement	Action	Status	Compliance Date
1.1 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 under the accessibility standards referred to in this Regulation.	Trans Power will develop and implement policies demonstrating its commitment to meeting the requirements under the IASR, Trans Power will update its existing policies to demonstrate its commitment to meeting the requirements under the IASR.	Completed	01/01/2014
1.2 Accessibility Plans	Large Organizations shall: 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. b) Post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request. c) Review and update the accessibility plan at least once every five years.	Trans Power will develop and maintain a Multi-Year Accessibility plan outlining how it intends to remove barriers and meet its requirements under the IASR. Trans Power will post its accessibility plan on its website, and provide this plan in an accessible format upon request. Trans Power will review and update its accessibility plan at least once every five years.	Completed	01/01/2014
1.3 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: 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.	Trans Power will provide training to all of its employees in Ontario that deal with the public or other third parties on their behalf, as well as all those who are involved in the development and approval of customer service policies, practices and procedures. This will be done to ensure their understanding with regards to Ontario's accessibility laws, as well as the <i>Human Rights Code</i> , as it applies to persons with disabilities. Training will be provided in a way that best suits the specific duties and responsibilities of its participants.	In Progress	01/01/2015



Part 2: Information and Communication Standards

Initiative	IASR Requirement	Action	Status	Compliance Date
2.1 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 accessible formats and communication supports upon request.	Trans Power will ensure that all existing feedback processes are accessible to people with disabilities upon request.	In Progress	01/01/2015
2.2 Accessible Formats and Communication Supports	<p>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> <ul style="list-style-type: none"> a) In a timely manner that take 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. <p>The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.</p> <p>Every obligated organization shall notify the public about the availability of accessible formats and communication supports.</p>	Trans Power will ensure that all publically available information is made available in an accessible format upon request, and will notify the public about the availability of accessible formats.	In Progress	01/01/2015
2.3 Accessible Website and Web Content	Large organizations shall make their internet websites and web content conform to 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.	Trans Power will ensure that all new web content produced as of January 1 st , 2014 is in compliance with (WCAG) 2.0 Level AA standards. Trans Power will also ensure that all web content available to the public is in compliance with (WCAG) 2.0 Level AA standards by January 1 st , 2021.	Ongoing	01/01/2021 All internet websites and web content must conform to WCAG 2.0 Level AA requirement.



Part 3: Employment Standard

Initiative	IASR Requirement	Action	Status	Compliance Date
3.1 Recruitment General	Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.	Trans Power will post a disclaimer on future job advertisements stating that applicants that require accommodation due to disability shall be accommodated upon request.	In Progress	01/01/2016
3.2 Recruitment Assessment / 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.</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.</p>	<p>Trans Power will inform selected applicants prior to the commencement of the assessment processes that accommodations for persons with disabilities are available upon request.</p> <p>Trans Power will consult with applicants whom request accommodations, and see to the arrangement of such accommodations in a manner that takes into account the applicant's accessibility needs.</p>	In Progress	01/01/2016
3.3 Notice to Successful Applicants	Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	Trans Power will notify new employees of its policies for accommodating employees with disabilities during the onboarding processes.	In Progress	01/01/2016
3.4 Informing Employees of Supports	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.	<p>Trans Power will provide its employees with copies of all relevant policies used to support its employees with disabilities.</p> <p>Trans Power will provide this information to new employees during the recruitment and onboarding process.</p>	In Progress	01/01/2016



	<p>Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</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.</p>	<p>Trans Power will provide its employees with updated information whenever a change to its existing accessibility policies occurs, and will provide updated copies of all relevant policies and procedures upon employee request.</p>		
3.5 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.</p> <p>The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<p>Trans Power will provide or arrange for the provision of accessible communication supports for all information affecting the performance of an employee's job, as well as information (such as memorandum) that is generally available to all employees, upon request, in consultation with the employee making the request.</p>	In Progress	01/01/2016
3.6 Workplace Emergency Response Information	<p>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.</p> <p>If an employee who receives</p>	<p>Where appropriate, employees of Trans Power with disabilities are provided with individualized emergency response plans to ensure they are aware of the processes in place to safely evacuate from premises owned and operated by Trans Power during an emergency. These plans are reviewed and updated as changes occur to ensure information remains current and</p>	Completed	01/01/2012



	<p>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.</p> <p>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.</p> <p>Every employer shall review the individualized workplace emergency response information,</p> <p>(a) when the employee moves to a different location in the organization;</p> <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</p>	<p>accurate.</p>		
<p>3.7 Documented Individual Accommodation Plans</p>	<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.</p> <p>The process for the development of documented individual accommodation plans shall include the following elements:</p> <p>1. The manner in which an employee requesting accommodation can</p>	<p>Trans Power will review its current accommodation processes and practices.</p> <p>Trans Power will develop and operationalize a standard process for the development of documented individual accommodation plans for persons with disabilities.</p> <p>Trans Power will provide training to its managers, supervisors and to relevant administrative personnel on these processes and procedures.</p>	<p>In Progress</p>	<p>01/01/2016</p>



	<p>participate in the development of the individual accommodation plan.</p> <p>2. The means by which the employee is assessed on an individual basis.</p> <p>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</p> <p>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 development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</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</p>	<p>Trans Power will communicate these processes and procedures to existing employees via memorandum, and will incorporate these processes and procedures into the onboarding process for new employees.</p>		
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	<p>needs due to disability.</p> <p>Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) identify any other accommodation that is to be provided.</p>			
<p>3.8 Return to Work Process</p>	<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 order to return to work; and</p> <p>(b) shall document the process.</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.</p> <p>The return to work process referenced in this section does not replace or override</p>	<p>Trans Power will conduct a review of its current return to work process.</p> <p>Trans Power will identify and document any gaps in its current return to work process, and will update its documentation based on gaps and compliance requirements.</p>	<p>In Progress</p>	<p>01/01/2016</p>



	any other return to work process created by or under any other statute.			
3.9 Performance Management	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>Trans Power will assesses its current performance management system to ensure that accessibility features are incorporated into the process.</p> <p>Trans Power will update performance management processes as required, and will ensure that future performance management processes incorporate accessibility features.</p> <p>Trans Power will ensure that all individuals responsible for managing employee performance are properly trained with respect to accessibility features.</p>	In Progress	01/01/2016
3.10 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.	<p>Trans Power will review current training and professional development materials to determine accessibility features.</p> <p>Trans Power will ensure that all future training and materials developed by the organization incorporate accessibility features.</p> <p>Trans Power will ensure that promotion criteria, practices and processes take into account individual accommodation needs in accordance with AODA.</p>	In Progress	01/01/2016
3.11 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.	<p>Trans Power will review and update its current redeployment practices and processes to ensure accommodation plans are referenced.</p> <p>Trans Power will ensure that all individuals responsible for hiring and/or redeploying individuals take employee accommodation needs into account during the redeployment process.</p>	In Progress	01/01/2016



Closing Statements

In accordance with Trans Power and the AODA's commitment to treating all people in a way that allows them to maintain their dignity and independence, the Multi-Year Accessibility plan is posted on Trans Power's website and will be reviewed and updated at least every five years.

Submitting Feedback

If you have any questions, or have feedback related to the Trans Power Multi-Year Accessibility Plan, please contact the Trans Power Human Resource Department.

Philip Slater
905-660-9575 ext. 231
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Employees, customers and/or partners that provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted within a reasonable time.



Referenced Documentation

Trans Power Accessibility Policy

Trans Power Accessible Customer Service Policy

Accessibility for Ontarians with Disabilities Act, 2005

Accessibility Standards for Customer Service, Ontario Regulation 429/07

Blind Person's Rights Act, 1990

Dog Owners' Liability Act, Ontario

Food Safety and Quality Act 2001, Ontario Regulation 31/05

Health Protection and Promotion Act, Ontario Regulation 562

Ontario Human Rights Code, 1990