

POLICY & PROCEDURE MANUAL

Policy Number:	HR-045	Subject:	AODA – Multi-Year Accessibility Plan for the Integrated Accessibility Standards Regulation (IASR) <i>Accessibility for Ontarians with Disabilities Act, 2005</i>
Effective Date:	Jan. 1, 2015	Policy Owner:	Human Resources
Last Reviewed:	Jan. 1, 2023		

Introduction

Under the Accessibility for Ontarians with Disabilities Act (AODA), Ontario organizations, including Motion, are required to develop multi-year accessibility plans to help make Ontario accessible by 2025.

The Motion Multi-Year Accessibility Plan (MYAP) builds upon our previous efforts and reaffirms Motion’s commitment to accessibility.

An accessible Motion means...

- Persons with disabilities receive quality goods and services in a timely manner.
- Information and communications are available in accessible formats to all Motion employees and clients.
- Persons with disabilities can participate fully and meaningfully as Motion employees.
- There is greater accessibility into, out of, and around Motion facilities and public spaces.
- Motion employees can continually identify barriers to accessibility and actively seek solutions to prevent or remove them.

The 2023–2028 Motion MYAP is based on best practices, as well as input from Motion employees and accessibility stakeholders.

Intent

This 2023 to 2028 accessibility plan outlines the policies and actions that Motion will put in place to improve opportunities for people with disabilities in accordance with the requirements communicated under the [Integrated Accessibility Standards, Ontario Regulation 191/11](#).

Statement of Commitment

In fulfilling our mission, Motion is committed to providing our goods and services in a way that respects the dignity and independence of people with disabilities. We are committed to excellence in serving all our clients equally and will carry out our functions and responsibilities within the requirements set forth under the *Accessibility for Ontarians with Disabilities Act (2005)* and its associated Regulations and strive to meet the needs of individuals with disabilities in a timely and effective manner. For further details regarding our AODA commitment and policies, please review our [AODA Policy \(Relink to new one\)](#) Motion's MYAP will be reviewed and updated by Motion at least once every five (5) years more frequently as required.

Part 1: Accessibility Plan – General Requirements

Client Service at the Forefront!

The Accessible Customer Service Standard under the Integrated Accessibility Standard Regulation (IASR) requires Motion to provide accessible public services for people with disabilities and to ensure that policies and procedures are in place to support this requirement.

Outcome:

- *An accessible Motion that includes ensuring people with disabilities receive quality goods and services in a timely manner, supported by effective policies, procedures, tools and resources that promote accessibility in client service.*

Our 2023-2028 Priorities and Commitments

The five-year accessibility plan includes both new and continuing priorities and commitments that will help with Motion's goal towards identifying, removing and preventing barriers to accessibility.

Leadership

- Our leadership team will be equipped with training and resources to foster excellence in accessible Motion client service delivery to all Motion clients and employees. Leaders will share best practices in different service delivery channels and collaboratively develop and share strategies and feedback for continuous improvement in accessible service delivery.

Policies and Practices

- Annually review the Motion Accessibility Policy and common client service standards and identify opportunities to reinforce and promote requirements that enhance accessible client service.

- Examine and address potential barriers at Motion public spaces, such as retail and service/waiting areas and parking spaces.
- Ensure that in the case of planned or unplanned service disruptions, notice is provided explaining the reason for the disruption, estimated duration, and any alternative facilities or services available.
- Ensure that a person with a disability is permitted to enter the premises with their service animal and to keep the animal with them, unless the animal is otherwise excluded by law from the premises.
- Ensure that a person with a disability and their support person are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

Training

- Ensure that all employees continue to complete mandatory training on Integrated Accessibility Standard Regulation requirements and disability-related obligations under the Ontario Human Rights Code and other provincial codes and regulations.
- Continue to promote training to support Motion's excellence in accessible client service.
- Provide training on changes to policies to staff on an ongoing basis and keep records of training.

Part 2: Accessibility Plan – Information and Communications Standard

Clear and Accessible Communications

The information and communications standard under the Integrated Accessibility Standard Regulation (IASR) requires Motion to communicate and provide information in ways that are accessible to people with disabilities.

Outcomes:

- *Enhanced accessibility as it relates to communication supports, formats, and websites and web content.*
- *Motion employees have the tools and resources to effectively develop information and communications in accessible formats.*

By delivering information and communications in accessible formats to all Motion employees and clients, Motion will support the effective delivery of services.

As well, Motion will regularly review compliance and focus on ways to improve accessibility in information and communications.

Our 2023-2028 Priorities and Commitments:

Standards and Resources

- Maintain, develop, and update standards and guides for accessible digital, marketing and media content used at Motion.
- Develop, provide, and promote resources, using a variety of communications and training formats, including in-person sessions, guides, tutorials and testing methodology and tools, through Motion's Learning Portal for employees seeking advice and guidance related to accessible documents (e.g., PowerPoint, Excel, Word, use of PDFs, etc.).

Web Platforms

- Continue to ensure that the motioncares.ca platform meets Web Content Accessibility Guidelines (WCAG) standards.
- Provide guidance to locations on accessible web content.
- Evaluate accessibility related to the platform for the Motion intranet.

Digital/Web Services

- Ensure that digital services are designed with accessibility in mind, striving for all users to have equal access to information and functionality.

Forms

- Ensure all client forms meet the highest standards of quality, usability, and accessibility.

Notices

- Provide consistent notices in Motion public spaces, such as retail, service and waiting areas, and online notifications to the public regarding accessible formats and communications support, upon request.
- Ensure that the processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Part 3: Accessibility Plan – Employment Standards

Accessible Employment

The Employment Standard under the Integrated Accessibility Standard Regulation sets out accessibility requirements that the Motion must follow to support the recruitment and accommodation of employees. This includes preparing individualized emergency response plans for persons with disabilities and making employment practices and workplaces more accessible for new and existing employees with disabilities.

Outcomes:

- *Efforts will align with the province’s employment strategy for people with disabilities as Motion works to ensure that more people with disabilities are employed, engaged and advancing in at Motion.*
- *Accommodation practices will be reviewed to ensure people with disabilities are able to participate fully and meaningfully as Motion employees.*

Our 2023-2028 Priorities and Commitments:

Policies

- Continue to regularly review our human resources policies to prevent or remove systemic employment barriers, ensure they are compliant with legislation and reflect best practices.

Data Collection

- Collect more data to evaluate our recruitment, leadership development and accommodation practices and ensure that employment-related policies and programs are evidence-based. This will include an employee survey or enhance current survey practices that will provide new demographic insights that will inform future priority-setting. The survey includes questions on disability and accommodation, and the data collected can be used by Motion to inform program and policy decisions.
- Motion will continue to monitor and integrate best practices within Motion employment policies and programs.

Recruitment, Assessment and Selection Processes

- Motion and applicable talent partner(s) will focus on the recruitment of persons with disabilities. This includes:
 - Identify a targeted outreach strategy to showcase people with disabilities.
 - Partnering with applicable organization that can assist with our outreach work to job seekers with disabilities.
 - Continue to attract diverse talent by applying a recruitment inclusion “lens” into all recruitment processes. This will help managers and recruiters to identify, mitigate, and eliminate potential biases and barriers and be more inclusive in all aspects of the recruitment process.
 - Reinforce inclusive hiring practices through manager and employee training on the use of this “lens”.
 - Identify opportunities to include voluntary diversity job application questions to encourage inclusive selection.

Learning and Development

- Continue to build accessibility awareness through learning portal, web-based and in-class training and coaching for managers, such as how to respond to the needs of employees with an illness, injury, and/or disability through duty to accommodate courses and best practices.
- HR Business Partners to provide regular feedback and identify accommodation and recruitment coaching opportunities for managers. Improve managers' ability to intervene in workplace conflict, including potential harassment and discrimination
- Employees will have access to training that helps them understand how hidden biases impact workplace interactions and how to prevent biases from negatively impacting others, including people with disabilities. This has been identified as mandatory training across all provinces in which Motion operates.
- Promote principles and practices of respectful workplaces through training and resources. Promote employee responsibilities for contributing to respect in the workplace
- Support employees by addressing disrespectful behaviours that diminish productivity, engagement, teamwork, diversity and client service.
- Develop and enhance key principles of “inclusive leadership” within leadership development programs. These programs will also be enhanced to better meet the diverse needs of participants and reflect greater diversity. This type of content will help address common challenges with recruitment, accommodation and career advancement.
- Ensure materials and locations for talent management and career development discussions are accessible, including the career center portal.
- Ensure all materials, activities and learning methods for leadership programs and other corporately developed programs are in accessible formats, or will be made accessible upon request, to support the professional development and advancement of all employees.

Employee Support

- Establish a centralized disability support services model to provide better manager support and dedicated employee accommodation planning.
- Continue to collaborate with managers to secure employee feedback that will help improve disability and accommodation support.
- Upon request, provide employees with employment documents and communication supports in accessibility formats.
- Make accessible parking available for both client and employee use.

Mental Health

- Work with partners in mental health and addictions, EAP partners, Managers, JHSCs to develop a Motion mental health framework. This framework will include new strategic goals for the organization including employee wellness, empowered leaders, open culture, social responsibility and People/HR performance measures. It will outline



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initiatives that promote mental health, well-being and awareness. Initiatives will include the continuation of the EAP support services, webinar series, and additional resources and training. The framework will be promoted through executive champions tasked with demonstrating leadership in creating positive and inclusive workplaces.

- Continue to provide and improve the Employee Assistance Program to support employees in the areas of mental health and wellness through a wide range of supports and resources.



PART I - General Requirements

Initiative	Description	Action	Status	Compliance Date
Establishment of Accessibility Policies	3. (1) 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.	Policy posted	Complete	January 1, 2015
Accessibility Plans	4. (1) 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; and c) Review and update the accessibility plan at least once every five years.	Multi-year plan posted Task force will meet on regular intervals to review multi-year plan and any requirements to be implemented. Latest Review/Update listed in policy document header.	Ongoing	January 1, 2018
Self-Serve Kiosks	6. (2) Large organizations and small organizations shall have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks.	Not Applicable at this time.	N/A	January 1, 2015
Training	7. (1) Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the	Rolled out training program purchased by 3 rd party to all employees and management via our e-learning training system.	Complete	January 1, 2015

	<p>Human Rights Code as it pertains to persons with disabilities to,</p> <p>(a) all employees, and volunteers;</p> <p>(b) all persons who participate in developing the organization's policies; and</p> <p>(c) all other persons who provide goods, services or facilities on behalf of the organization.</p>	<p>Content refresh and redesign completed in 2018/19</p> <p>Training is provided to all new employees during orientation and onboarding, with a digital signature confirming acknowledgement.</p>		
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PART II – Information and Communications Standards

Initiative	Description	Action	Status	Compliance Date
Feedback	<p>11. (1) 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 communications supports, upon request.</p>	<p>Conducted a review of all feedback processes across the organization (internally and externally). Consulted with all functional areas to ensure all feedback processes are captured.</p> <p>Determined what accessible developments and communication supports we will provide upon request. (e.g. forms, brochures, etc.)</p> <p>Ensured employees and management are aware of</p>	<p>Complete</p> <p>Marketing will create feedback process posters for each location to post for client and employee view. Scheduled to be complete in 2023.</p>	January 1, 2015

		the need to accommodate upon request.		
Accessible Formats & Communication Supports	12. (1) 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, 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.	<p>Determined what accessible formats and communication supports we will provide to persons with disabilities upon request.</p> <p>Ensure these formats and supports can be provided in a timely manner.</p> <p>Communicated to employees and management that no additional charge is required.</p>	Complete	January 1, 2018
	12. (2) The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support.	<p>Communicated to employees and management this requirement in training program.</p> <p>Developed a protocol for situations where a suitable agreement cannot be made.</p>	Complete	January 1, 2018
	12.(3) Every obligated organization shall notify the public about the availability of accessible formats and communication supports.	Information posted on company website.	Complete	January 1, 2016

Emergency Procedures, Plans or Public Safety Info	13. (1) 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.	N/A	N/A	January 1, 2015
Accessible Websites & Web Content	14 .(2) 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.	Identify and address gaps.	In progress	<p>January 1, 2014 New internet websites and web content on those sites must conform with WCAG 2.0 Level A.</p> <p>January 1, 2021 All internet websites and web content must conform with WCAG 2.0 Level AA, other than,</p> <ul style="list-style-type: none"> • success criteria 1.2.4 Captions (Live) • success criteria 1.2.5

				Audio Descriptions (Pre-recorded).
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PART III – Employment Standards

Initiative	Description	Action	Status	Compliance Date
Recruitment – General	22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.	Identify process we will implement to notify applicants of accommodation available via policy statement: We are committed to providing accommodations for persons with disabilities. If you require accommodation, we will work with you to meet your needs.	Ongoing	January 1, 2016 Working with 3 rd party talent service to build strategies and ensure recruitment practices are inclusive.

Recruitment, Assessment or Selection Process	23 (1) 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.	Identified process we will implement to notify applicants of accommodation available. Trained managers to communicate this to applicants.	Complete	January 1, 2016
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	(2) 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>Identified barriers to interview process (script/guidelines for managers – asked if any accommodation is necessary for interview, location of room, format of tests, room set up, timelines, supports, paperwork)</p> <p>Updated procedure and interview script guidelines / templates.</p>		
Notice to Successful Applicants	24. Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.	<p>Updated offer letter with a standard clause:</p> <p>2018 update: <i>The Company has an accommodation process in place and provides accommodations for employees with disabilities. If you require a specific accommodation because of a disability or a medical need, please contact Human Resources hr@motioncares.ca so that arrangements can be made for the appropriate accommodations to be in</i></p>	Complete	January 1, 2016

		<i>place before you begin your employment.</i>		
Informing Employees of Supports	25.(1) 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.	Reviewed, trained / circulated policy.	Complete	January 1, 2016
	25.(2) Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment.	Incorporated training into onboarding process by making it a mandatory course for new hires.	Complete	January 1, 2016
	25.(3) 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.	See section 25(1.)	Complete	January 1, 2016
Accessible Formats & Communication Supports for Employees	26.1 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, (a) Information that is needed in order to perform the employee's job; and (b) Information that is generally available to employees in the workplace.	Identified what employees get / need to do their job by department Audited regular communication Identified how we are going to communicate, what our standard format will be and what we will provide upon request.	Complete	January 1, 2016

	26.2. The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support.	Created list of what the employee will require – policy, communication supports that are available.	Complete	January 1, 2016
Workplace Emergency Response Information	27 (1) 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.	These requirements are site specific and will be reviewed with manager and employee on an as needed basis (e.g. change in accommodation needs, site redesign, relocation, etc.)	Complete (as needed)	January 1, 2015
	27 (2) 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.	Emergency Response plan development instructions are outlined in the AODA Employment Standards Policy.	Complete (as needed)	January 1, 2015
	27 (3) 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.		Complete (as needed)	January 1, 2015
	27 (4) Every employer shall review the individualized workplace emergency response information,		Complete (as needed)	January 1, 2015

	(a) when the employee moves to a different location in the organization; (b) when the employee's overall accommodations needs or plans are reviewed; and (c) when the employer reviews its general emergency response policies.			
Documented Individual Accommodation Plans	28 (1) 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.	HR has developed a process with the key stakeholders in the organization	Complete	January 1, 2016
	28 (2) The process for the development of documented individual accommodation plans shall include the following elements: 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved. 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	Updated policy Reviewed return to work policy and made modifications as necessary.	Complete	January 1, 2016

	<p>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.</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 needs due to disability.</p>			
Return to Work Process	<p>29.(1) 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>	Reviewed current process	Complete	January 1, 2016
	29.(2) The return to work process shall,	Identified steps and documented	Complete	January 1, 2016

	<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 individual documented accommodation plans, as described in section 28, as part of the process.</p>			
	29 (3) 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.		Complete	January 1, 2016
Performance Management	30.(1) 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.	Forms and process is reviewed annually with input from field/leaders. Should an employee require alternate formats or accessibility support in order to successfully complete performance management processes and practices, Motion will ensure compliance with accommodation obligations.	Complete	January 1, 2016
Career Development & Advancement	31 (1) 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	Reviewed current process to ensure alignment with newly established recruiting processes and future succession planning strategy (2022)	Complete	January 1, 2016

	career development and advancement to its employees with disabilities.			
Redeployment	32.(1) 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.	Reviewed current process Transition/communication plan for redeployment of associate with an individual accommodation plan.	Complete	January 1, 2016

Questions? Please contact HR@motioncares.ca