ONX ENTERPRISE SOLUTIONS LTD.

Accessible Canada Act

Multi-Year Accessibility Plan

June 1, 2023 to May 31, 2026

Updated September 3, 2024

Available at: https://www.onx.com/accessibility-standards

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Background

In July 2016, the government of Canada began their consultations with more than 6,000 Canadians to determine what an accessible Canada means to them. As a result of these consultations, *Bill C-81: An Act to Ensure a Barrier-Free Canada* was tabled in June 2018. The Accessible Canada Act ("ACA"), which aims to make Canada a barrier-free country by January 1, 2040, became effective in July 2019. To attain that goal, OnX Enterprise Solutions Ltd. ("OnX" or "we") must proactively identify, remove, and prevent barriers in the following seven (7) priority areas:

- employment;
- the built environment (buildings and public spaces);
- information and communication technologies;
- communication, other than information and communication technologies;
- the procurement of goods, services and facilities;
- the design and delivery of programs and services; and
- transportation (airlines, as well as rail, road and marine transportation providers that cross provincial or international borders).

Guiding principles

- "nothing without us": persons with disabilities are involved in the design and implementation of the strategy.
- collaboration: departments and agencies work in collaboration with each other, with bargaining agents, and with other public, private, and not-for-profit organizations.
- sustainability: the strategy prioritizes actions that will have an enduring impact.
- transparency: the strategy is developed and implemented transparently, and departments and agencies will report openly and transparently on their efforts to remove barriers.

Goals

Five goals to realizing the vision:

- employment – improve recruitment, retention, and promotion of persons with disabilities.
- built environment – enhance accessibility.
- technology – make information and communications technology usable by all.
- services – equip employees to design and deliver accessible programs and services.
- culture – build an accessibility-confident workplace.

The Accessible Canada Act has the following planning and reporting requirements for federally regulated organizations:

- **prepare and publish accessibility plans:**
    - make accessibility plans to identify, remove, and prevent barriers in the priority areas in their policies, programs, practices and services;
    - update federally regulated organizations plans every three (3) years or as specified in regulations; and
    - consult people with disabilities when creating and updating their plans.
- **set up a feedback process:**
    - have a way to receive and deal with feedback about their accessibility.
- **prepare and publish progress reports:**
    - make regular progress reports that describe the actions the organization has taken to implement their accessibility plans;
    - include information in their reports on feedback received and how the organization took the feedback into consideration; and
    - consult people with disabilities when preparing their reports.

General

OnX partners with businesses to provide IT solutions that solve their biggest challenges whilst achieving outstanding business results. As a federally regulated private organization with over 100 employees, OnX must comply with the ACA. Under the ACA, the organization must develop a Multi-Year Accessibility Plan (the "Plan") to identify and eliminate barriers for people with disabilities. The Plan has been developed with input from employees, people with disabilities and other stakeholders, and lays out a three-year journey to increased accessibility.

Feedback Mechanism

The ACA requires organizations to establish a departmental process for receiving and dealing with feedback regarding the implementation of the Plan. OnX will regularly monitor and evaluate feedback and ensure that it is incorporated into future plans when possible. OnX will acknowledge any accessibility feedback received, other than feedback provided anonymously. If contact information is shared and you do not ask to be anonymous, we may follow up with you. Any personal information you provide will remain confidential and will be managed following privacy laws. This information will only be shared per these laws or with your consent. If you have any questions, feedback, or suggestions, you can communicate with us by mail, email, or telephone to the designated representative listed below. You may provide feedback anonymously if desired.

Michael Puza, Sr. Corporate Counsel
OnX Enterprise Solutions Ltd.
20 Toronto Street, Suite 800
Toronto, ON M5C 2B8
Telephone: 888-783-2506
Email: LegalRegulatory@cbts.com

Executive Summary

OnX's first ever Plan was developed by conducting interviews with several focus groups where employees of the organization had the opportunity to provide feedback on current processes and experiences regarding accessibility.

We identified the following which were used as a basis to develop our Plan:

- employees lack of confidence in the accommodation process and how to access the accommodation process;
- processes to be developed regarding accessibility for content being posted to our website;
- processes to be implemented for procurement, vendors, etc.;
- develop an individual or group/committee to be champions for accessibility (resources, equipment, etc.);
- consider accessibility when new policies and practices are implemented; and
- expectation of accessible design rather than fixing problems as they are identified.

Based on the priority areas identified in the ACA, OnX has determined several actions listed below to work towards the elimination and prevention of the identified barriers. These actions will have a direct impact on creating a culture of inclusiveness that calls attention to accessibility at OnX. Additionally, OnX will be measuring and reporting on progress with respect to the implementation of these actions.

Accessibility Statement

OnX strives to be barrier-free, accessible, and inclusive to all and is committed to providing accessible and inclusive services for all employees, clients, and other stakeholders. OnX will review and develop its programs, policies, goods, and services with the intent to increase accessibility over time.

Multi-Year Accessibility Plan

1. Employment

OnX is developing accessibility knowledge and information among employees, both in how work is completed and regarding personal accommodations. OnX has a robust accommodation process in place where employees can reach out to the health services team directly or to their direct manager to begin the process. There is also an option for employees to request an accommodation through Connect (Intranet). Emergency protocols do include consideration for employees with disabilities at some of the locations. Completing an extensive review of these emergency plans at all locations, to ensure consideration is there would be beneficial. Developing an individual or group with extensive knowledge on accessible resources would help meet the goals of the Plan.

Barriers:

- employees have limited access and familiarity with accessibility resources and information;
- clarify whether all emergency protocols involve consideration for those with disabilities; and
- lack of champion for Canadian operations and accessible resources including equipment and software.

Actions:

- provide a general reminder to all employees on how to access the accommodation process (i.e., who to contact, what to expect of the process, etc.) to improve confidence;
- provide general training on accessibility awareness and sensitivity to employees as well as additional training for specific employees on specific topics as identified by their role (i.e., training on WCAG (Web Content Accessibility Guidelines), training on creating accessible documents for communications employees, and training on accessible recruitment for Human Resources employees);
- review and determine specific training needs with respect to accessibility for all employees and new hires;
- revise the Orientation package to include accessibility resources and information pertinent to OnX employees and new hires;
- ensure a review of all emergency protocols are completed and that consideration and alternate routes are available to those with disabilities; and
- develop in-house champions with overall knowledge of accessibility and available resources.

2. Built Environment

OnX recognizes the importance of an accessible built environment. As such, OnX will continue to work with employees and building owners to achieve the highest level of accessibility within

OnX offices and facilities. OnX has office locations in Alberta, Toronto, Thornhill, Nova Scotia, and Newfoundland. The offices range in size and vary in use and function.

Barriers:

- some locations do not have automated/accessible entrances/doorways;
- some of the locations' washrooms are not accessible; and
- no clear protocol in place for when those with disabilities do need to enter an inaccessible area.

Actions:

- establish a process to raise accessibility issues to the building owner i.e., Power door operator functionality;
- ensure alternative arrangements are made available to anyone needing accessibility accommodations prior to attending the office. i.e. if attending the office and the power door operator is not functional, arrange to meet the visitor at the entrance to facilitate entry;
- consider a review of all offices to include the identification of barriers and a plan to remove them over time; and
- develop a protocol for what needs to be done when an individual with a disability needs to enter an area that is not accessible.

3. Information and Communication Technologies (ICT)

Documents for the OnX webpages go through an approval process prior to upload. The website had a WCAG check for accessibility done by a third party and work is underway to correct errors identified in that audit.

Barriers:

- content added to the website is not fully accessible;
- lack of knowledge on creating accessible documents; and
- WCAG errors have been identified on the website and must be corrected.

Actions:

- training and support to be provided on creating accessible WORD documents and accessible PDF's to be added to website;
- continue to evaluate the accessibility of documents currently posted to the website; and plan to improve accessibility of those documents where necessary;
- ensure all content posted to the website is compliant to WCAG requirements; and
- continue to correct WCAG errors identified and continue audit process as necessary.

4. Communications other than ICT

OnX is dedicated to ensuring that all its communications, whether internal or external, are

accessible. This includes ensuring that our communications are written in plain and concise language.

Barriers:

- no existing process to provide alternative formats and communication supports upon request by a user or employee; and
- technical and/or sector specific language is used in public facing reports and documents

Actions:

- develop a process and information on providing alternative formats and communication supports; and
- create standards for public-facing communications to be in plain language and made accessible.

5. The Procurement of Goods, Services, and Facilities

Procurement is a key partner in achieving accessibility at OnX. As such, OnX will implement procurement principles, rules, and practices with the goal to advance accessibility objectives. Accessibility will be considered in new and existing purchasing agreements. Goods and services purchased will be accessible to the greatest extent possible.

Barriers:

- accessibility of products and services procured by OnX are not given specific consideration in the procurement process at this time.

Actions:

- establish a process to evaluate accessibility in all phases of procurement;
- include the requirement for external contractors to indicate accessibility training has been completed on tenders and requests for proposals;
- ensure any purchased goods and services are as accessible as possible;
- consider accessible-competent firms when equal value bids are presented for procurement;
- add in an accessibility checklist in initial review of vendors.

6. The Design and Delivery of Programs and Services

OnX must consider accessibility in the delivery of programs and services. A fundamental aspect in achieving this will be implementing meaningful accessibility improvements including OnX designing programs, services and products using an accessibility lens for its customers.

Barriers:

- accessibility is not thoroughly considered when new programs and services are

implemented.

Actions:

- develop Plan to ensure accessibility is considered when new programs and services are put in place or are reviewed;
- establish how accessibility will be addressed when designing programs and services for clients.

7. Transportation

This priority area under the Act is not applicable to OnX.

OnX Action Plan at a Glance

Action	Timeline	Roles and Responsibilities	Success Criteria
Provide general reminder to all employees on how to access the accommodation process.	2023		
Provide general training on accessibility awareness and sensitivity to employees. And provide additional training for specific employees on specific topics as identified by their role.	2024		
Review and determine specific training needs with respect to accessibility for all employees and new hires.	2024-2026		
Revise the Orientation package to include accessibility resources and information pertinent to OnX.	2024		
Ensure a review of all emergency protocols are completed and consideration is given to those with disabilities at all locations.	2023		
Begin to develop in house champion (s) with overall knowledge of accessibility and available resources.	2024-2026		
Establish a process to raise accessibility issues to the building owner - i.e., Power door operator functionality.	2024		
Ensure alternative arrangements are made available to anyone needing accessibility accommodations prior to attending the office.	2024		
Consider a review of all offices to include the identification of barriers and a plan to remove them over time.	2025-2026		

Develop a protocol for what needs to be done when an individual with a disability needs to enter an area that is not accessible.	2024		
Provide training and support on creating accessible documents.	2025		
Develop a process and information on providing alternative formats and communication supports.	2025		
Create standards for public facing communications to be in plain language and accessible.	2025		
Establish a process to evaluate accessibility in all phases of procurement.	2025		
Ensure all purchased goods and services are as accessible as possible.	2025		
Include the requirement for external contractors to indicate accessibility training has been completed on tenders and requests for proposals.	2026		
Develop a plan to ensure accessibility is considered when new policies and practices are put in place or reviewed.	2024		
Establish how accessibility will be addressed when designing programs and services for clients.	2025		

A. Consultations

One of the guiding principles of this strategy is the statement "*Nothing without us*" which affirms that persons with disabilities must be involved in the design and implementation of this Plan at every stage.

Methodology

OnX consulted with persons with disabilities on the current state of accessibility at the OnX and with employees who provide services. The consultation was conducted in two parts:

Key Staff Members

Key employees at OnX were consulted in facilitated focus groups. Internal stakeholders with knowledge of employment practices, procurement, facilities, digital resources, communications, and the design and delivery of good and services were consulted in small focus groups. Questions regarding accessibility barriers, current accommodation practices, and priorities for remediation were discussed and responses have been used to create this plan.

Accessible Canada Act Review Committee

The plan was also reviewed by Excellence Canada's standing Accessible Canada Act Review Committee. Consultation Group members are individuals with a variety of lived experience with disabilities and knowledge of a range of accessibility issues. Consultation was conducted between April 24th – April 27th, 2023. The committee consists of members who self-identify with a disability including mobility, vision, learning disability, mental health disability, and hearing loss.

Committee members were provided an overview of the functions at OnX and an advance copy of the draft Plan. Members provided comments on the Plan format, readability, accessibility actions as outlined in the Plan, suggested timelines for actions, and specific barriers that could be encountered. Committee feedback has been incorporated into this Plan.

B. Implementation, Monitoring, and Reporting

To ensure that accessibility remains a constant priority, the ACA dictates that regulated entities prepare and publish annual progress reports on the implementation of their plans. Similar to our Plan, progress reports must be prepared in consultation with persons with disabilities. The progress reports must also present the feedback received (if any) and how that feedback was taken into consideration. OnX's first progress report will be published one (1) year after the publication of our first Plan. This progress report will include updates on the actions OnX has taken. As specified in the regulations, organizations must publish a revised plan every three (3) years. OnX's first revised Plan will be published on June 1, 2026.

C. Glossary

Barrier

"Means anything—including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice—that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation."

Disability

"Means any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment—or a functional limitation—whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society."

ICT (Information and Communication Technology)

"An extensional term for information technology (IT) that stresses the role of unified communications and the integration of telecommunications (telephone lines and wireless signals) and computers, as well as necessary enterprise software, middleware, storage and audiovisual, that enable users to access, store, transmit, understand and manipulate information."

Web Content Accessibility Guideline (WCAG)

"The WCAG documents explain how to make web content more accessible to people with disabilities. Web "content" generally refers to the information in a web page or web application, including:

- natural information such as text, images, and sounds;
- code or markup that defines structure, presentation, etc.