

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	1 of 11
		Replaces:	
Issued by:		Dated:	

1 POLICY

- 1.01 Under the AODA, Ontario Regulation 191/11 entitled "Integrated Accessibility Standards Regulation" (Integrated Regulation) came into force July 1, 2011. The regulation establishes accessibility standards for information and communications. Clarity Hiring is included in the regulation's definition of an "obligated organization," and must comply with the phased-in requirements of the regulation beginning January 1, 2012.
- 1.02 Clarity Hiring is committed to working towards being compliant with the information and communications standards under the **Accessibility for Ontarians with Disabilities Act, 2005** (AODA) as they are introduced and become law.
- 1.03 Clarity Hiring recognizes the history of discrimination against persons with disabilities in Ontario and the fundamental importance of developing, implementing and enforcing information and communications standards in a timely manner in order to achieve accessibility for Ontarians with disabilities.
- 1.04 Clarity Hiring is committed to the principles of independence, dignity, integration and equality of opportunity described in the AODA and to meeting the needs of people with disabilities, in a timely manner, through the implementation of this policy.
- 1.05 Clarity Hiring is committed to establish, maintain and implement policies as well as associated practices and procedures in the Integrated Regulation, specifically in the areas of information and communications, and to meet the accessibility needs of people with disabilities in a timely manner.
- 1.06 Clarity Hiring is committed to the establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	2 of 11
		Replaces:	
Issued by:		Dated:	

outlines the organization's strategy to prevent and remove barriers with respect to the information and communications standard under the Integrated Regulation.

- 1.07 Clarity Hiring is committed to excellence in serving all of our clients, including people with disabilities. When providing information to, or communicating with, a person with a disability, we will provide the information and communication in a manner that takes into account the person's disability as provided in the customer service standard and under the Integrated Regulation.
- 1.08 Clarity Hiring is committed to ongoing improvements to the accessibility of its information and communication systems offered to customers, employees, volunteers and members of the general public.
- 1.09 Clarity Hiring is committed to promoting values that support relationships between people with disabilities and the organization.
- 1.11 Clarity Hiring is committed to providing training to employees, contractors, volunteers, other third parties acting on Clarity Hiring's behalf and whoever is involved in the policy process about the provision of accessible information and communication to persons with disabilities. All these individuals will be trained in providing accessible information and communications.
- 1.12 Clarity Hiring is committed to meeting alternative format requests in a timely fashion that responds appropriately to any situation and the urgency of the situation.
- 1.13 Clarity Hiring will endeavour to provide everyone with the same quality of information/communication and within a reasonable timeframe.
- 1.14 Clarity Hiring will identify, remove and prevent barriers to access of information and communications systems of the company.

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	3 of 11
		Replaces:	
Issued by:		Dated:	

- 1.15 Clarity Hiring will create, provide and receive information and communications in ways that are accessible for people with disabilities.
- 1.16 Clarity Hiring will provide or make arrangements for accessible formats and information and communication supports when a person with a disability requests them.
- 1.17 Clarity Hiring will make accessible formats and communication supports available in a timely manner and at no additional cost other than the regular price charged to everyone for the same information.
- 1.18 Clarity Hiring will conform to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0 as outlined in the Information and Communications Standard for accessible websites and web content.
- 1.19 Clarity Hiring will ensure that emergency procedures, plans or public safety information meet the needs of persons with disabilities, and will provide this information in an accessible format or with communications supports on request.
- 1.20 Clarity Hiring will notify members of the public about the availability of accessible information and communications.
- 1.21 Clarity Hiring will ensure that it has processes for receiving and responding to feedback that are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.

2 PURPOSE

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	4 of 11
		Replaces:	
Issued by:		Dated:	

2.01 The purpose of this Statement of Policy and Procedures is to create a statement of commitment (policy) that provides a framework within which accessibility plans and initiatives are to be created in order to move the organization towards the goal of improved accessibility for people with disabilities, specifically with regard to the information and communications standard in the Integrated Regulation.

2.02 The commitments in this policy are intended to ensure that accessibility remains a priority in Clarity Hiring's decision-making process and will serve to assist in ensuring that decisions improve accessibility and do not inadvertently create barriers.

3 SCOPE

3.01 This policy applies to the Clarity Hiring's:

- Customers
- Employees
- Volunteers
- Applicants for employment with Clarity Hiring, who may require employment accommodation through the recruitment, assessment, selection and hiring process
- Visitors
- Contractors and subcontractors engaged by Clarity Hiring
- Any other third party providing goods, services or facilities on Clarity Hiring's behalf

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	5 of 11
		Replaces:	
Issued by:		Dated:	

4 RESPONSIBILITY

- 4.01 It is the responsibility of Human Resources to ensure the application of this policy and that the organization achieves compliance with the law and creates an environment that provides the widest feasible scope of access, which is the right or opportunity to reach, use or participate in the organization's information and communications systems and services.
- 4.02 Managers, directors and vice-presidents are responsible for ensuring that all employees follow the guidelines set out in this policy.
- 4.03 Each manager, director and vice-president is responsible to ensure all employees are trained under the accessibility regulations and standards under the AODA, the **Human Rights Code** and all related policies, practices and procedures.
- 4.04 All employees, volunteers, contractors and subcontractors, any other person acting on behalf of Clarity Hiring and persons involved in the creation of Clarity Hiring's policies are responsible for adhering to and following the commitments set out in this policy.

5 DEFINITIONS

- 5.01 "**Accessible formats**" may include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.
- 5.02 "**Accessible information and communications**" means considering accessibility and all ability levels when planning information and communications, and giving people adequate time to process and reply to information provided.

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	6 of 11
		Replaces:	
Issued by:		Dated:	

- 5.03 **“Accommodation”** means the special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.
- 5.04 **“Communication supports”** may include, but are not limited to, captioning, alternative and augmentative communication, plain language, sign language and other supports that facilitate effective communications.
- 5.05 **“Communications”** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- 5.06 **“Dignity”** means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.
- 5.07 **“Equal opportunity”** means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.
- 5.08 **“Extranet website”** means a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.
- 5.09 **“Independence”** means when a person is able to do things on his or her own without unnecessary help or interference from others.
- 5.10 **“Information”** includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that conveys meaning.
- 5.11 **“Integration”** means service is provided in a way that allows the individual to benefit from equivalent services, in the same place and in

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Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	7 of 11
		Replaces:	
Issued by:		Dated:	

the same or similar way as other individuals, unless an alternate measure is necessary to enable the individual to access goods or services.

- 5.12 **“Internet website”** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.
- 5.13 **“Intranet website”** means an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.
- 5.14 **“New Internet website”** means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- 5.15 **“New intranet website”** means either an intranet website with a new domain name or an intranet website with an existing domain name undergoing a significant refresh.
- 5.16 **“Reasonable efforts”** means taking approaches that meet the required needs of the individual.
- 5.17 **“WCAG guidelines”** explain how to make web content more accessible to people with disabilities. Web content generally refers to the information on a web page or a web application, including, but not limited to text, images and forms.
- 5.18 **“Web Content Accessibility Guidelines”** means the World Wide Web Consortium recommendation, dated December 2008, entitled Web Content Accessibility Guidelines (WCAG) 2.0.
- 5.19 **“Web page”** means a non-embedded resource obtained from a single

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	8 of 11
		Replaces:	
Issued by:		Dated:	

Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent.

6 REFERENCES and RELATED STATEMENTS of POLICY and PROCEDURES

Accessibility for Ontarians with Disabilities Act, 2005

Ontario Human Rights Code

Accessibility Standards for Customer Service, Ontario Regulation 429/07

Exemption from Reporting Requirements, Ontario Regulation 430/07

Integrated Accessibility Standards, Ontario Regulation 191/11

SPP AS 3.01 – Statement of organizational commitment

SPP AS 3.02 – Multi-year accessibility plans

SPP AS 4.01F–A – Accessible information and communications standard multi-year plan

SPP AS 4.02 – Accessible formats and communication supports

SPP AS 4.03 – Feedback process

SPP AS 4.04 – Emergency response procedures, plans or public safety information

SPP AS 4.05 – Accessible website and web content

SPP AS 4.06 – Educational and training resources and materials

SPP AS 4.07 – Training to educators

SPP AS 4.08 – Public libraries and libraries of educational and training institutions

7 PROCEDURES

7.01 Multi-year accessibility plan

Clarity Hiring will work to improve accessibility in information and communication systems by developing a multi-year accessibility plan by January 1, 2020.

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	9 of 11
		Replaces:	
Issued by:		Dated:	

This plan will conform to the information and communications standard which outlines a phased-in strategy to prevent and remove barriers and address the current and future requirements of the standard.

The plan will be posted on the company website. It will also be provided in alternative formats upon request.

The multi-year accessibility plan will be reviewed and updated at least once every five years.

7.02 **Training**

Clarity Hiring will ensure that by September 1, 2019, training is provided to all employees, contractors, volunteers, other third parties acting on its behalf and all those involved in the creation and approval of its policies, practices and procedures on the requirements of the accessibility standards for information and communications referred to in the Integrated Regulation, on the policy, practices and procedures, and on the **Human Rights Code** as it pertains to persons with disabilities.

The training will be appropriate to the recipients' duties. It will be provided as soon as is practical.

Further training will be provided on any changes that may be made to this policy or the requirements.

Clarity Hiring will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

7.03 **Emergency response procedures, plans and public safety information**

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	10 of 11
		Replaces:	
Issued by:		Dated:	

Clarity Hiring will ensure that its emergency response procedures, plans or public safety information is in place as required by law; and that these plans consider the needs of persons with disabilities and are available in an accessible format.

Clarity Hiring will prepare accessible emergency procedures and plans whenever it is made aware of any requirements in this regard.

Clarity Hiring will ensure these plans are available in an accessible format.

7.04 **Accessible websites and web content**

Clarity Hiring will ensure that it has an accessible website and web content in place, and that all new Internet and intranet websites and the web content on those sites will conform to Level A of Version 2 of the Web Content Accessibility Guidelines by January 1, 2014.

Clarity Hiring's Internet and intranet websites and the web content on those sites will conform to Level AA of version 2 of the Web Content Accessibility Guidelines by January 1, 2021, as required by the Integrated Regulation.

7.05 **Accessible formats and communication supports**

Clarity Hiring will create accessible communication standards that ensure the following:

- Upon request, Clarity Hiring provides or arranges for the provision of accessible formats and communication supports for persons with disabilities
- Clarity Hiring does so in a timely manner that takes into account the person's accessibility needs

STATEMENT of POLICY and PROCEDURE			
Manual:	Accessibility Standards	SPP No.	AS 4.01
Section:	Standard for Information and Communications	Issued:	Dec. 1, 2019
Subject:	Committing to and providing for accessible information and communications	Effective:	Dec. 1, 2019
Issue to:	All Manual Holders	Page:	11 of 11
		Replaces:	
Issued by:		Dated:	

- If there is a cost, Clarity Hiring does not charge more for such formats and supports than it charges other persons.
- Clarity Hiring consults persons with a disabilities as to what would be a suitable alternative format or communication support for them
- Clarity Hiring puts a statement on the website about the availability of accessible formats and communication supports (e.g., large print documents, accessible PDFs.)
- If the information or communications are unconvertible, upon request, the organization will provide an explanation of why it is unconvertible, and provide a summary of the unconvertible information or communications
- Clarity Hiring will create this requirement by January 1, 2014, as required by the Integrated Regulation.

7.06 **Accessible feedback process**

Clarity Hiring will ensure that it has processes for receiving and responding to feedback that are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

Clarity Hiring welcomes comments on its goods and services, including comments with respect to how we serve customers with disabilities.

7.07 If you have questions on this policy, want to provide feedback or have a complaint, Human Resources or the designate can be reached at 416 695 7525 or info@clarityhiring.com.

7.08 This policy is available in an alternative format upon request.