

2014-2021 Accessibility Plan

Company: Medavie Inc. (Medavie Blue Cross)

Effective: January 1, 2014

Issued by: Chief Human Resource Officer

Date of last review: May 25, 2021

Statement of Commitment

Medavie Blue Cross is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities and will do so by preventing and removing barriers to accessibility and by meeting accessibility requirements as stated under [the Accessibility for Ontarians with Disabilities Act](#).

Accessible Emergency Information

Medavie Blue Cross is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

- If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, we shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.
- The required information will be provided as soon as we become aware of the need for accommodation due to the employee's disability.
 - Individual workplace emergency response information will be reviewed:
 - When the employee moves to a different location in the organization;
 - When the employee's overall accommodation needs or plans are reviewed; and
 - When we review our general emergency response policies.

Training

Medavie Blue Cross will provide training to employees on Ontario's accessibility laws and on the Ontario Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees and other staff members.

Medavie Blue Cross will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessibility laws:

- All employees will complete the required training as part of their onboarding;
- A training session will be provided when there are significant changes to the legislation; and
- Records of completed training will be maintained.

Information and Communications

Medavie Blue Cross is committed to the information and communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

Medavie Blue Cross will take the following steps to make all new websites and content on those sites conform with [Website Content Accessibility Guidelines \(WCAG\) 2.0](#), Level A by January 1, 2014:

- We will continue to conduct a review of our existing websites to identify any issues on non-compliance with WCAG 2.0, Level A. To the extent that is reasonably practicable, any identified issues will be resolved on an ongoing basis.
- All new internet websites and web content created, or existing internet web sites going through a significant refresh, will be made to conform with WCAG 2.0 Level A.

Medavie Blue Cross will take the following steps to ensure existing feedback processes are accessible to people with disabilities upon request by January 1, 2015:

- Medavie Blue Cross will ensure existing processes for receiving and responding to feedback are accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request by January 1, 2015.

Medavie Blue Cross will take the following steps to make sure all publicly available information is made accessible upon request by January 1, 2016:

- We will post a notice on our website that communicates we will make information accessible to the public upon request.
- We will develop a system for accepting and processing such requests, and we will include in our website notice the manner in which members of the public can submit request for accessible information.
- We will provide such accessible formats and communication in a timely manner that take into account the person's accessibility needs due to disability.
- We will provide such accessible formats and communication at a cost that is no more than the regular cost charged to other persons.
- We will consult with the person making the request to determine the suitability of an accessible format or communication support.

Medavie Blue Cross will take the following steps to make all websites and content conform with WCAG 2.0, Level AA by January 1, 2021:

- By January 1, 2021, all internet web sites and web content on those sites must conform with WCAG 2.0 Level AA.

- We will post resources on our company intranet for employees to use to meet this requirement.
- We will ensure all employees involved in the development of our internet web sites and web content are aware of - and have access to - developer guidelines and best practices for meeting this requirement.
- We will ensure all employees involved in the testing of our internet web sites and web content are aware of - and have access to - the testing guidelines and best practices for meeting this requirement.
- We will implement regular health checks on our internet websites and content to identify gaps in meeting the standard.

Employment

Medavie Blue Cross is committed to fair and accessible employment practices. We will take the following steps to notify the public and employees that, when requested, Medavie Blue Cross will accommodate people with disabilities during the recruitment, selection and hiring processes, and when people are hired:

- We will incorporate this requirement into our Recruitment policies and advise and make available to all employees and people leaders.
- We will advise the public and employees through our public recruitment websites that, when requested, we will accommodate people with disabilities during the recruitment, selection and hiring processes.
- We will include a statement in all job postings conveying our commitment to accessible recruitment and hiring processes, and inviting individuals with accessibility concerns to communicate those concerns to us.
- At the time of hire, if applicable, we will communicate resources available for employees with disabilities.

Medavie Blue Cross will take the following steps to develop and put in place a process for developing individual accommodations plans and return-to-work policies for employees that have been absent due to a disability:

- We will conduct a comprehensive review of our current practices and related processes.
- We will develop and have in place a return-to-work process for any employee requiring disability-related accommodations in order to return to work.
- We will consider all requests for modified work on a case-by-case basis and, together with the impacted employee, will develop individualized plans pursuant to which tasks are to be adapted or reassigned as needed.
- We will provide training to managers, as needed, so they understand how best to support employees with disabilities.

2014-2021 Accessibility Plan

We will take the following steps to ensure the accessibility needs of employees with disabilities are considered when Medavie Blue Cross conducts performance management, career development and redeployment processes:

- We will incorporate the accessibility requirement into Policies and advise and make available to all employees and people leaders.
- We will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.
- We will communicate and promote the importance of focusing on achievement rather than ability or disability, and the retention and promotion of employees based on consistent, objective criteria.
- We will determine whether additional training resources are necessary for employees with disabilities to ensure they have the same development opportunities as others.
- We will ensure that opportunities for transfer and promotion are provided in accessible formats.

Medavie Blue Cross will take the following steps to prevent and remove other accessibility barriers identified:

- We will ensure all Policies do not create any accessibility barriers and will make policies available to all employees and people leaders.

Design of Public Spaces

Medavie Blue Cross will continue to meet [the Accessibility Standards for the Design of Public Spaces Standard](#) when building or making major modifications to public spaces. The accessibility standards that relate to the building space include:

- Accessible street parking.
- Service counters and waiting areas.
- Wider spaces for people who use mobility aids (e.g., wheelchairs) and standard-width spaces for people who use mobility-assistive devices (e.g., canes, crutches and walkers).

Medavie Blue Cross will put the following procedures in place to prevent service disruptions to its accessible parts of its public spaces:

- In the event of a service disruption, we will notify the public of the service disruption and alternatives available.