

2023 - 2026 Accessibility Plan

Company: Medavie Inc. (Medavie Blue Cross)

Effective: August 29, 2023

Issued by: Chief Human Resource Officer

Date of last review: August 29, 2023

Statement of Commitment

Medavie is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equality. 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 is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We 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 is provided as soon as we become aware of the need for accommodation due to the employee's disability.
- Medavie reviews the individualized workplace emergency response information:
 - When the employee moves to a different location in the organization.
 - When the employee's overall accommodation needs, or plans are reviewed; and
 - When the company reviews our general emergency response plan.

Training

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

Medavie 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 are maintained in the employee's file.
- The company is committed to ongoing training of staff when necessary.

Information and Communications

Medavie 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.

We will continue to conduct a review of our existing websites to identify any issues on non-compliance with WCAG 2.1, Level AA. 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 2.1 Level AA.

Where the company receives a request for an accessible copy of its accessibility plan or progress report, the company provides the plan or report in the accessible format within 45 days in the case of a braille or audio format, or in the case of a request for the plan in any other format, within 15 days.

Where requested by an individual, the company makes its accessibility plan or progress report available to that person in either print, large print, braille, audio, or an electronic format compatible with adaptive technology, as requested by the individual.

We will provide 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 will take the following steps to make all websites and content conform with WCAG 2.1, 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.

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

- We incorporate this requirement into our Recruitment practices and advise and make available to all employees and people leaders.
- We 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 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 communicate resources available for employees with disabilities.

2023-2026 Accessibility Plan

Medavie 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 conduct a comprehensive review of our current practices and related processes.
- We develop and have in place a return-to-work process for any employee requiring disability-related accommodations in order to return to work.
- We 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 provide training to managers, as needed, so they understand how best to support employees with disabilities.

We take the following steps to ensure the accessibility needs of employees with disabilities are considered when Medavie 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 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 determine whether additional training resources are necessary for employees with disabilities to ensure they have the same development opportunities as others.
- We ensure that opportunities for transfer and promotion are provided in accessible formats.

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

- We 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 will continue to meet The Design of Public Spaces Standards 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 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.

Gaps Identified:

- There is an opportunity to improve accessibility on Medavie's job application site to meet web content accessibility guidelines.
- Language on external Accessibility site to include:
 - o We will make information accessible when requested.
 - o Provide an avenue for feedback.

2023-2026 Accessibility Plan

- There is an opportunity to enhance the workplace accommodation process and clarify roles and responsibilities. There is also an opportunity to provide strong accommodation support in candidate communications during the hiring process and onboarding process.
- Access to a community group for our employees with disabilities.
- Seek feedback from the disabled community on programs, processes and initiatives.
- Consult with persons with disabilities during the preparation and updates of the Accessibility plan.
- Documentation of testing guidelines to ensure websites and content conform with WCAG 2.0, Level AA

Opportunities to Improve Accessibility and Next Steps:

- Ensure that job application site complies with the WCAG 2.0 Level A guidelines.
 - Review and update the workplace accommodation policy.
 - Support the growth and development of our Disabilities, Caregivers & Allies Employee Resource Group (ERG).
 - Engage Disabilities, Caregivers, and Allies (ERG) in preparation and updates of the Accessibility plan.
 - Engage Disabilities, Caregivers, and Allies (ERG) to provide feedback on programs, processes and initiatives, and understand where there are opportunities to eliminate barriers.
 - A strong accommodation support note/reminder, and a more nuanced paragraph that captures Medavie's commitments to DEI and equal opportunity on all candidate communications.
 - Review and update all Medavie corporate and operations onboarding communications to ensure there is a clear step in the initial days of onboarding where candidates can submit workplace accommodations requests. Develop supporting materials such as an FAQs document or guideline to ensure all new hires are fully aware of the process and who to contact for any questions (someone who is not their supervisor).
- Complete documentation of testing guidelines to ensure websites and content conform with WCAG 2.0, Level AA.

Progress Report:

Medavie has undergone the Inclusive Hiring Project to make diversity, equity, inclusion and accessibility more of a top priority across talent acquisition. This would involve making actionable changes to support hiring policies, accommodations, training, eliminating unconscious bias and recruiting via non-traditional outlets.

- Underwent a short-term action plan within our DEI strategy to ensure all Medavie print and digital assets and materials are accessible.
- Deployed a Diversity & Inclusion survey to understand our representation of employees that experience a disability (Invisible and Visible).
- Supported National Accessibility Week with a working group and initiatives that included resources on neurodiversity and training on Disability Inclusion at Work
- Established a Disabilities, their Caregivers and Allies Employee Resource Group

At Medavie we have made progress in supporting employees with disabilities and are working towards making it a priority to recruit and retain.

As we work every day to make accessibility and disability inclusion efforts a priority, and as technology transformation creates new opportunities, we will gain a deeper understanding on how our work environment can evolve as well.

Jan 1, 2014:

- All new websites and content on those sites conformed to WCAG 2.0 Level A.
- Addressed gaps with existing websites to ensure compliance with WCAG 2.0 Level A.

January 1, 2015:

- 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 – documented in the Accessible Customer Service Policy.

August 29, 2023:

- Updated language on external Accessibility site:
 - o In situations where telephone or written communication is not feasible, we will upon request explore using an alternative method of communication.
 - o To provide feedback on our accessibility practices, please email the Corporate Compliance Officer at compliance@medavie.bluecross.ca.
- Updated external career page with the following language:
 - o We will accommodate people with disabilities during the recruitment, selection and hiring processes.