Accessibility Plan







Useful Tips

This contains additional information and guidance for better understanding of the section.



Attention

Before proceeding the reader must verify critical information before taking action.



Caution information

Prompt for the reader to proceed with caution and consider alternative requirements and outcomes e.g. refer to regulatory/statutory requirements in conjunction with the section.



References

Information on documents cited in this Standard.



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1 | Policy

GTAdnata is committed to promoting accessibility and inclusion in compliance with the Accessibility Canada Act. This policy outlines our commitment to removing barriers, providing reasonable accommodations, and creating an inclusive environment that allows individuals with disabilities to fully participate in all aspects of employment.

GTAdnata will comply with all applicable accessibility standards established under the Accessibility Act.

We will regularly review and update our policies, practices, and procedures to ensure compliance with the accessibility standards and to remove barriers for individuals with disabilities.

GTAdnata will develop, implement, and maintain an Accessibility Plan that outlines our strategies and actions for identifying, preventing, and removing barriers in our workplace.

The Accessibility plan will include specific measures to address accessibility in areas such as employment, the built environment, information and communication, procurement of goods, services and facilities, design and delivery of programs and services, and transportation.

GTAdnata is committed to providing reasonable accommodation to employees with disabilities to enable them to perform their job duties, access employment – related benefits, and fully participate in the workplace.

GTAdnata will provide training and education to employees on accessibility awareness, the rights, and responsibilities of employees with disabilities, and the importance of creating an inclusive workplace.

GTAdnata encourages employees, customers, and the public to provide feedback regarding barriers they encounter or suggestions for improving accessibility.

GTAdnata will designate a person responsible for overseeing the Accessibility plan and addressing accessibility concerns, and encourages employees, customers, and the public to provide feedback regarding any barriers they encounter or suggestions for improving accessibility.

This policy will be communicated to all employees and posted in accessible formats in the workplace and public forums. It will be periodically reviewed to ensure compliance with the Accessibility Canada Act and to reflect any necessary updates.



2 | Method

During preparation of this plan GTAdnata has considered the following core principles:

- (a) all persons must be treated with dignity regardless of their disabilities;
- (b) all persons must have the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- (c) all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities;
- (d) all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities;
- (e) laws, policies, programs, services and structures must take into account the disabilities of persons, the different ways that persons interact with their environments and the multiple and intersecting forms of marginalization and discrimination faced by persons;
- (f) persons with disabilities must be involved in the development and design of laws, policies, programs, services and structures; and
- (g) the development and revision of accessibility standards and the making of regulations must be done with the objective of achieving the highest level of accessibility for persons with disabilities.

Accessible Canada Act S.C. 2019, c. 10



3 | General

3.1 Contact

GTAdnata designate responsible to receive feedback on barriers and accessibility plans:

Director of Safety & Quality

2710 Britannia Road East,

Cargo Area #2, Building #7

Mississauga, Ontario, L4W

Phone: (905) 671 - 4443 (310)

Email: <u>b.lipovsek@gtadnata.ca</u>

Director of Human Resources

2710 Britannia Road East,

Cargo Area #2, Building #7

Mississauga, Ontario, L4W

Phone: (905) 671 - 4443 (222)

Email: <u>Harjovan.bamrah@gtadnata.ca</u>



4 | Report

4.1 Employment

Recruitment and Hiring

Barrier:

1. Job postings and application process that may exclude individuals with disabilities.

Action:

- *i)* timelines
 - Review of Job Posting verbiage conducted June 18, 2024
- *ii)* roles and responsibilities
 - Human Resources will review postings and verify verbiage.
 - Postings should provide information in accessible formats such as electronic text, large print, or accessible online platforms.
 - job postings state GTAdnata's commitment to providing accommodation for applicants with disabilities and provide contact information for accommodation requests.
- iii) determining and tracking intended outcomes
 - HR intends to implement an applicant tracking system (ATS) and will review progress -November 2023.

Barrier:

2. Lack of accommodation during interviews or assessments, such as not providing interpreters or visually accessible formats.

Action:

- i) timelines
 - Human Resources will assess the onboarding process Review July 24, 2023
- ii) roles and responsibilities

Review will:

- consider providing communication support during job application process, such as captioning for videos or alternative means of communication for individuals with hearing or speech impairments.
- iii) determining and tracking intended outcomes
 - HR intends to implement an applicant tracking system (ATS) and will review progress November 2023.

Workplace Accommodations

Barrier:

1. Failure to provide reasonable accommodations to enable individuals with disabilities to perform their job duties.

Action:

i) timelines

Review date June 30, 2023

ii) roles and responsibilities

Human Resources will be responsible for reviewing and updating verbiage in the HR manual and Employee handbook, including:

- provide a means of communication to promote dialogue. This includes the anonymous reporting QR code currently used. Regular communication and feedback from the employee can help identify any necessary adjustments.
- As per section 5 of the ACA *Consultations* Human Resources will explore multiple venues to encourage dialogue.
- iii) determining and tracking intended outcomes
 - Currently GTAdnata uses an Anonymous reporting tool as part of the SMS.
 - This tool can be used to report accessibility concerns, and track responses.

Barrier:

2. Lack of flexibility in work arrangements to accommodate disability-related needs, such as modified schedules or assistive devices.

Action:

- i) timelines
 - September 2023
- ii) roles and responsibilities
 - Discussion with departmental heads to identify specific needs and limitations during hiring process, explore potential solutions, and find mutually agreeable scheduling arrangements.
 - examples of assistive devices may include screen readers, hearing aids, mobility aids, and ergonomic equipment.
- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool
 - Explore possible solutions which may include mobile hearing test units

Discrimination and Harassment

Barrier:

1. Workplace discrimination based on disability, including unequal treatment, negative stereotypes, or exclusion.

Action:

i) timelines

Review HR manual and Employee Handbook – July 24, 2023 Implementing Employment Equity Plan – January 1, 2024

ii) roles and responsibilities

Human resources will review Manuals and revise if necessary, including:

- prompting disability awareness and training programs to foster understanding, respect, and inclusive attitudes towards individuals with disabilities.
- designating trained individuals to handle complaints, conduct impartial investigations, implement appropriate disciplinary measures.
- Implementation of Employee Equity plan
- iii) determining and tracking intended outcomes
- Will issue periodic survey once a year and evaluate responses i.e., survey monkey.

Barrier:

2. Harassment or bullying of employees with disabilities.

Action:

i) timelines

Policy committee reviewed the current Workplace Harassment Policy – May 12, 2023 Updates and consultations will continue – next meeting is scheduled for June 2023.

ii) roles and responsibilities

Policy committee topics:

- workplace policies that address harassment and bullying, including those related to disability.
- policies should clearly define procedures for reporting incidents, and outline consequences for violations.

- iii) determining and tracking intended outcomes
 - Will issue periodic survey once a year and evaluate responses.

4.2 The built environment

Physical Architectural Barriers

Barrier:

1. Inaccessible physical environment, including entrances, workplaces, washrooms, and common areas.

Action:

i) timelines

Review June 26, 2023

ii) roles and responsibilities

Safety Manager will reach out to GTAA to assess the following potential barriers:

- doorway and entrance modification including installation of automatic doors.
- ensure that restrooms are accessible i.e., wider doorways, grab bars, accessible sinks and toilets
- regular maintenance audits, and engaging experts and facility managers in assessing and improving the physical environment.

Safety Manager will Assess and recommend:

- providing seating areas throughout the premises providing individuals with mobility limitations or fatigue a place to rest.
- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool

Barrier:

2. Lack of appropriate signage or wayfinding for individuals with visual impairments.

Actions:

i) timelines

Review June 26, 2023

ii) roles and responsibilities

Safety Manager will Assess and recommend:

• signage with large fonts, high contrast, Braille

- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool

4.3 Information and communication technologies

Technological Barriers

Barrier:

1. Although inaccessible information and communication technologies, such as websites, software, and digital content, may pose challenges for employees with disabilities, at the present time no such challenges have been identified at GTAdnata.

Action:

- i) timelines
 - Review input from surveys and reporting tools monthly and assess changes.
- ii) roles and responsibilities
 - The Human Resources Director will review data monthly.
- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool
 - Will issue periodic survey once a year and evaluate responses.

4.4 Communication, other than information and communication technologies

Sensory barriers

Barrier:

1. visual or hearing impairments can hinder individuals from fully participating in various environments.

Action:

i) timelines

Review January 2024

ii) roles and responsibilities

Safety Officers will conduct regular inspections of the workplace:

- clear and well-placed signage with high contrast colors and large, legible fonts.
- textures surfaces, or auditory cues to guide individuals with visual impairments.
- visual alerts, such as flashing lights or visual displays, to supplement auditory alarms.
- iii) determining and tracking intended outcomes

- Encourage use of the Anonymous reporting tool
- Will issue periodic survey once a year and evaluate responses.

4.5 The procurement of goods, services, and facilities

Supplier Diversity and Accessibility:

Barrier:

1. Consider supplier diversity programs that promote the inclusion of businesses owned by individuals with disabilities or organizations that prioritize accessibility in their products or services.

Action:

- i) timelines
- ii) roles and responsibilities

continue open dialogue with air carriers to ensure compliance with al ACA regulations.

- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool
 - Will issue periodic survey once a year and evaluate responses.

Barrier:

2. Accessibility requirements are being communicated with suppliers or facility manager i.e., GTAA

Actions:

i) timelines

Review January 2024

ii) roles and responsibilities

Safety Officers will conduct regular inspections of the workplace and communicate findings and/or accessibility issues with the suppliers or facility manager i.e., GTAA

- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool
 - Will issue periodic survey once a year and evaluate responses.
 - corrective action results

4.6 The design and delivery of programs and services

Training and Career Development

Barrier:

1. GTAdnata has not identified any accessibility issues with Training materials and programs.

Actions:

i) timelines

Review January 2024

ii) roles and responsibilities

Manager Training will conduct a review of any communications regarding accessibility issues and training.

- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool
 - Will issue periodic survey once a year and evaluate responses.

4.7 Transportation

Transportation systems

Barrier:

1. There is a need for accessible transportation to and from the Britannia Road facility. i.e., bus times are infrequent and staff without personal transportation need to walk or taxi to Dixie and Britannia to catch a bus.

Actions:

i) timelines

Review January 2024

ii) roles and responsibilities

Human resources plan to add a QR code to job postings and will review result periodically.

- iii) determining and tracking intended outcomes
 - Encourage use of the Anonymous reporting tool
 - Will issue periodic survey once a year and evaluate responses.



5 | Consultations

Consulting individuals about disability while maintaining dignity requires a thoughtful and respectful approach as the consultation itself may impact self-esteem and alter the relationship of the consultee and consultant.

GTAdnata used the following methods to complete this report:

- i) Feedback when conducting Training.
- ii) Interviews with staff with Sensory disabilities
- iii) Anonymous reporting tool that has been.

GTAdnata plans to:

- i) Encourage use of the Anonymous reporting tool
- ii) Will issue a periodic survey once a year and evaluate responses.
- iii) Consultation with experts.



6 | Glossary

Term	Definition
Affiliates	Anyone outside the company who is not a customer or contractor
Designate	An individual chosen by the department manager
Abbreviation	Definition
GOM	Ground Operations Manual
PAX	Passenger Services
SOP	Standard Operating Procedures
HR	Human Resources
SME	Subject Mater Expert
SMM	Safety Management Manual
WH	Warehouse
QC	Quality Control
SEC	Security
LC	Load Control
CLC	Canada labour Code
ACA	Accessibility Act