Spark Power Corp

Multi-Year Accessibility Plan

Statement of Commitment to Accessibility

Spark Power Corporation is committed to providing a barrier-free environment for our clients/customers, employees, job applicants, and other stakeholders who enter our premises and access our information. As an organization, we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and the Integrated Accessibility Standards Regulation for Information and Communications, Employment, and Transportation, and eventually, for the Built Environment.

Our organization is committed to ensuring our compliance with accessibility legislation by incorporating policies, procedures, training for employees, and best practices. We will review these policies and practices on a regular basis. Our commitment to making our organization accessible to everyone includes the integration of accessibility legislation with our policies, procedures, and training. We are committed to reviewing and incorporating the following with our employees:

- Ensuring that employees, who develop policies, hire/manage staff and/or provide goods and services to customers are aware of the Human Rights Code and the Accessibility for Ontarians with Disabilities Act, 2005;
- Ensuring that our employment practices including (but not limited to) recruitment, candidate evaluation, and selection provide accommodation as needed and that employees and applicants are aware that accommodation is available;
- Ensuring that our emergency response plan includes accommodations for any employee requiring it, and that these plans are available upon request;
- Ensuring that individual workplace accommodation plans are developed and implemented as required;
- Ensuring our compliance with the Customer Service Standard; and
- Ensuring our compliance with the Integrated Accessibility Standards Regulation, including the development and implementation of a multi-year plan addressing how our company intends to continually improve in terms of accessibility for all.

This plan has been developed by our Accessibility Advisory Committee in accordance with the Integrated Regulation. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA. It will be provided in an alternative format upon request.

SECTION 1: REPORT ON MEASURES ALREADY IMPLEMENTED FOR 2012-2017

From 2012-2017, Spark Power Corporation will continue to comply with the Accessibility Standards for Customer Service Regulation and continue to implement initiatives to enhance accessibility in other areas under the Integrated Accessibility Standards Regulation -Standards for Employment, Information and Communications. When the Accessibility Standards for the Built Environment becomes law, the same will apply.

This section includes a summary of the initiatives Spark Power Corporation implemented on or before January 1, 2012 and will continue to implement from 2012-2025.

1. Standards for Customer Service

Spark Power Corporation met compliance with the requirements set out in the Accessible Customer Service Standard Regulation by:

- Establishing policies, procedures and practices for providing goods and services to persons with disabilities and posting these on the website.
- Providing accessibility awareness, AODA and customer service standard training to all staff who interact, or may interact, with persons with disabilities on behalf of the company or are involved in the creation and implementation of policies, practices, and procedures for the company.
- Developing a feedback form and making it available on the website. In addition, information on the accessible online feedback form has been added to the corporate website.
- Creating a customer service policy that highlights information about accessibility requirements under the AODA
- Reporting compliance to the customer service standard on the Accessibility Compliance Reporting tool at Service Ontario's ONe-Source for Business website.
- Tracking attendance for accessibility training courses.

Required legislative compliance:	January 1, 2012
Implementation timeframe:	September 2011 to January 2012
Completion Date:	January 1, 2012

2. EMERGENCY RESPONSE AND EVACUATION PLANS UNDER THE IASR STANDARDS FOR INFORMATION AND COMMUNICATIONS AND EMPLOYMENT

- There are currently no persons with disabilities that require accommodation to our emergency response and evacuation plan procedures but will be addressed on an individual basis as need arises.
- The emergency response plan and public safety information is available to the public in an accessible format or with appropriate communication supports upon request.
- Individualized emergency response information is reviewed when:
  - An employee moves to a different location in the organization
  - an employee's overall needs or plans are reviewed
  - when reviewing general emergency response policies

Required legislative compliance:	January 1, 2012
Implementation timeframe:	N/A
Completion Date:	N/A

No changes to plan required, plan was last updated August 2013

Additional Accessibility wording to be added by January 2014

SECTION 2: REPORT ON PLANNED MEASURES TO IDENTIFY, REMOVE AND PREVENT BARRIERS IN 2012-2017

Spark Power Corporation's accessibility plan focuses on four areas. These initiatives will support compliance with the existing Accessibility Standards for Customer Service. They will also help us enhance accessibility on other areas -information and communications, employment, and the built environment.

1. Standards for Customer Service
Spark Power Corporation is committed to ensuring that people with disabilities continue to receive accessible goods and services beyond January 1, 2012. This means they will receive goods and services with the same high quality and timelines as others per the customer service issued January 1, 2012.

Commitment
Company has adopted the accessible customer service policy and procedures.

Identification of barriers
Spark Power Corporation has currently not identified any customers with known disabilities. We have not received any information through our feedback process to date but will respond accordingly if we do receive feedback.

Planned action(s)
To meet ongoing compliance with the Accessibility Standards for Customer Service Regulation requirements and removal of barriers to persons with disabilities, Spark Power Corporation will:

- Continue to highlight the CS Policy in training activities
- Consider accessibility-related feedback received through all channels (i.e., online feedback form, correspondence, inquiries etc.) by assessing and responding to feedback as required.
- Assess premises and other areas where barriers may exist that prevent customer access to our goods and services.
- Continue to track and report on training compliance.
- Encourage staff to consider accessibility when planning meetings and events with customers, including vendors and suppliers.

Required legislative compliance:	None
Implementation timeframe:	Ongoing

2. STANDARDS FOR INTEGRATED ACCESSIBILITY GENERAL REQUIREMENTS

2.1 Statement of organizational commitment to accessibility and policies for employment and information and communications

To implement a statement of commitment and policies on how Spark Power Corporation will achieve accessibility through meeting the IASR's requirements.

Identification of barriers:
Spark Power Corporation will assess physical, attitudinal and communication barriers across the company to ensure we remove and prevent barriers to access for persons with disabilities in our organization.

Planned Actions:
- Draft a statement of organizational commitment that addresses how Spark Power Corporation will achieve accessibility through meeting the IASR's requirements.
- Spark Power Corporation's statement of commitment will be made available to the public on the premises and on the corporate website.

- Spark Power Corporation's statement of commitment will be available in an accessible format upon request. We will consult with the person with a disability when identifying the appropriate format.
- Policies will be created to address how accessibility will be achieved through our employment practices as well as information and communications

Required legislative compliance:	January 1, 2014
Implementation timeframe:	September 2013 - January 1, 2014
Completion Date:	January 1, 2014

2.2 Accessibility plan maintenance

Commitment:
Establish, implement and maintain a multi-year accessibility plan, which outlines the organizations strategy to prevent and remove barriers and meet its requirements.

Post the accessibility plan on the organizations website and provide the plan in accessible format upon request.

Review and update the accessibility plan at least once every 5 years.

Required legislative compliance:	January 1, 2014
Implementation timeframe:	September 2013 to January 1, 2014
Completion Date:	January 1, 2014

2.3 Procurement or acquisition of goods, services, or facilities

Not required for private sector.

2.4 Self-service kiosks

Spark Power Corporation does not employ self service kiosks at this time.

If Spark Power Corporation does ever employ self service kiosks, accessibility features will be taken into account when designing, purchasing or obtaining the kiosks.

2.5 Training

Commitment:
To implement a process for ensuring that all employees, volunteers, persons who deal with customers and the public on the company's behalf, and persons participating in the development and approval of the company's policies, practices and procedures receive the appropriate training that meets the requirements under the Integrated Regulation.

Planned Action(s)
Spark Power Corporation will:

- Provide training on the requirements of the Integrated Regulation and on the Human Rights Code as it pertains to persons with disabilities to all employees, volunteers, contractors, other third parties who interact with persons with disabilities on behalf of the company and persons involved in the creation of policies
- Keep and maintain a record of the dates when training is provided and the number of individuals to whom it was provided
- Provide training in respect to any changes to policies on an ongoing basis

Required legislative compliance:	January 1, 2015
Implementation timeframe:	January 2012 to January 1, 2015
Completion Date:	N/A

3. STANDARDS FOR INFORMATION AND COMMUNICATIONS

Spark Power Corporation is committed to making company information and communications accessible to people with disabilities.

Commitment:
Spark Power Corporation will incorporate new accessibility requirements under the information and communications standard to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of persons with disabilities. Spark Power Corporation will endeavour to provide necessary communication supports in a timely manner.

Identification of barriers:
Spark Power Corporation will assess its communication methods and attitudes to identify and remove barriers to information and communications with people with disabilities. Potential barriers include:

- Lack of website accessibility standards for the organization's websites
- Lack of a method to obtain user feedback on accessibility
- Lack of awareness among the organization's webmasters regarding website accessibility barriers
- Information overload and conflicting recommendations for website accessibility standards

Planned actions:
To meet compliance with the Accessibility Standards for Information and Communications under the IASR requirements and remove barriers to persons with disabilities, Logistics Alliance will:

- Upon request, provide or arrange for the provision of accessible formats and communication supports to persons with disabilities in a timely manner, considering the persons accessibility needs
- Post the accessibility plan on the company's website
- Post a statement on the website about accessibility and the availability of accessible formats and communication supports
- Work with the IT Department to make our website accessible per WCAG2.0 standards
- Develop web accessibility guidelines
- Remove barriers through implementation of the website accessibility guidelines and the generation of reports identifying accessibility barriers

- Ensure new internet websites and web content on those sites conform to WCAG 2.0 Level A by January 1, 2014
- Ensure all websites and web content conform to WCAG 2.0 Level AA other than success criteria 1 .2.4 Captions (Live) and success criteria 1 .2.5 Audio Descriptions (Pre-recorded) by January 1, 2021

Feedback process:
Make additional changes to the customer service feedback form so that it can be used for all accessibility feedback, including information & communications

Required legislative compliance:	January 1, 2016
Implementation timeframe:	January 2014 to January 1, 2016
Completion Date:	N/A

4. STANDARDS FOR EMPLOYMENT

Spark Power Corporation is committed to fair and accessible employment practices that attract and retain talented employees with disabilities.

4.1 Recruitment

Commitment:
Spark Power Corporation will incorporate new accessibility requirements under the employment standard to ensure that barriers in recruitment are eliminated and corporate policies are followed where applicable.

Identification of barriers:
Spark Power Corporation will assess recruitment policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of people with disabilities.

Planned action(s):
To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities in recruitment, Spark Power Corporation will:

- On the Spark Power Corporation website and in job advertisements, specify that accommodation is available for applicants with disabilities
- Notify employees and the public about the availability of accommodation in its recruitment processes for applicants with disabilities
- If the selected applicant requests an accommodation, consult with the applicant, and arrange for the provision of a suitable accommodation in a manner that takes into account the applicants accessibility needs
- When making offers of employment, notify the successful applicant of policies for accommodating the employees with disabilities

For our temporary staffing division –
List of types of Disabilities we are aware of our candidates having:

- M.I.D (mild intellectual delay)
- Reading
- Writing

- Allergies
- Color blindness
- Some light physical disabilities: missing digits, slight limp etc.

What we do to accommodate:
All applicants are given an application and a math, matching, label reading and English comprehension test. If they indicate they cannot do any part of the test, we tell them to leave it blank. This is done to help match our candidates' abilities to our various positions. Example if an applicant indicates they are dyslexic, or our test shows this could be an issue, they will not be sent to order pick where being able to match numbers/letters is important, but we could send as a packager. Our testing is done to ensure the applicant is successful and happy at their assignment. Some of our clients require the employee be able to see different colours, i.e., in quality control positions. The colour test is only administered if it is a bone fide job requirement for a position.

Applicants that cannot read/ and or write are able to bring a person with them that can scribe their application but are not to complete the test. The scribe must only write what the applicant is telling them. We write at the top of the application the name of the person who scribed for the applicant and the date.

We ask our applicants if they have any restrictions, we need to be aware of prior to placing on an assignment. Again, this is done to ensure the applicants can be successful at the position. Example, we ask about food allergies since we deal with many food companies. The applicant might be allergic to citrus and not able to work in an orange sorting facility but may be great at another.

We have a time and attendance system in many of our clients where the employee hand is scanned to punch in and out. If an employee has a deformity with their right hand, we are able to use the system using the left hand upside down or they can bypass this feature of the clock and sign in by waving their hand under the scanner.

We now have large print application and testing available. If hired, we also have a large print offer letter and Health and Safety booklet.

Required legislative compliance:	January 1, 2016
Implementation timeframe:	January 2014 to January 1, 2016
Completion Date:	N/A

4.2 Support Information for employees

Commitment:
Spark Power Corporation will incorporate new accessibility requirements under the Employment standard to ensure that barriers in information that supports employees are eliminated and corporate policies are followed where applicable.

Identification of barriers:
Spark Power Corporation will assess its supporting documents, policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of people with disabilities.

Planned action(s):
To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, Spark Power Corporation will:

- Inform current employees and new hires soon after they begin employment of Spark Power Corporation's policies supporting employees with disabilities, including, but not limited to, policies on the provision of job accommodations that consider an employee's accessibility needs due to disability
- Provide information under this section to new employees as soon as practicable after they begin their employment
- Keep employees up to date on changes to policies
- Provide accessible formats and communication supports to any employees who request them. If requested, the employer will consult with the employee to provide or arrange for provision of accessible formats and communication supports for:
  - Information that is needed in order to perform the employee's job
  - Information that is generally available to employees in the workplace

Required legislative compliance:	January 1, 2016
Implementation timeframe:	January 2014 to January 1, 2016
Completion Date:	N/A

4.3 Documented individualized plans (i.e., return to work plan, accommodation plan) **Commitment:**

Spark Power Corporation will incorporate new accessibility requirements under the employment standard to ensure that barriers in accommodation and other plans that support the employees are eliminated and corporate policies are followed where applicable.

Identification of barriers:

Spark Power Corporation will assess its return to work and accommodation plans, policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of people with disabilities.

Planned action(s):

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and remove barriers to persons with disabilities, Spark Power Corporation will:

- Include in the process the manner in which the employee requesting accommodation can participate in the development of the plan
- Include in the process the means by which the employee is assessed on an individual basis
- Provide an individualized accommodation plan in writing to any employee with a disability
- Include in the process the manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if and how accommodation can be achieved
- Provide an individualized return to work plan in writing for any employee who has been absent from work due to a disability and requires disability related accommodations to return to work
- Take steps to protect the privacy of the employee's personal information
- Outline the frequency in which individual accommodation plans will be reviewed and updated and the manner in which it will be done
- Provide the employee with the reasons for the denial if the individual accommodation plan is denied

- Include any individualized workplace emergency response information
- Identify any other accommodation that is to be provided to the employee

Required legislative compliance:	January 1, 2016
Implementation timeframe:	January 2014 to January 1, 2016
Completion Date:	N/A

4.4 Performance assessment, career development and advancement, and redeployment

Commitment:
Spark Power Corporation will incorporate new accessibility requirements under the employment standard to ensure that barriers in performance assessment, career development and advancement, and redeployment are eliminated, and policies are followed where applicable.

Identification of barriers:
Spark Power Corporation will assess its performance reviews, career development and advancement, redeployment programs, policies, practices and procedures, methods, and attitudes to identify and remove barriers to employment of people with disabilities.

Planned action(s):

To meet compliance with the Accessibility Standards for Employment under the Integrated Regulation requirements and to remove barriers to persons with disabilities, Spark Power Corporation will:

- Take the accessibility needs of employees with disabilities and their individualized accommodation plans into account:
  - When assessing their performance
  - In managing their career development and advancement
  - When redeploying them
- Take into account the accessibility needs of employees with disabilities when providing career development and advancement to its employees with disabilities
- Take into account the accessibility needs of employees with disabilities when redeploying employees

Required legislative compliance:	January 1, 2016
Implementation timeframe:	January 2014 to January 1, 2016
Completion Date:	N/A

5. STANDARDS FOR TRANSPORTATION
This standard does not apply to Spark Power Corporation.

6. STANDARDS FOR THE BUILT ENVIRONMENT
Spark Power is committed to greater accessibility in, out of, and around the buildings we use. When the standard comes into force or when possible before that happens, Spark Power will ensure that facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.