

# Pathway Accessibility Plan



Our Accessibility Plan has developed in accordance with the requirement of the Accessible Canada Act. (S.C. 2019, c. 10) and its regulations (ACA).

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## Provide feedback or request an alternative format

Please complete our Accessibility Feedback form or contact us at 416-214-6363 or [tsd@corp.pathcom.com](mailto:tsd@corp.pathcom.com) if you wish to provide feedback on accessibility. All information is treated as confidential, and you may remain anonymous if you choose.

## Introduction

Pathway Group of Companies (Pathway) is committed to ensuring that the key principles of independence, dignity, integration and equality of opportunity as well as reasonable effort are reflected in its operations and is aligned to Integrated Accessibility Standards Regulation (IASR) and principles of ESA. Pathway Group of Companies will provide services in a way that respects the dignity and independence of people with disabilities and will use reasonable efforts to ensure its policies, practices and procedures are consistent with the spirit and the requirements of the Accessibility Standards for Customer Service and The Accessible Canada Act.

The Accessible Canada Act (ACA) identifies several priority areas that Pathway has and will continue to work towards and ensure:

- a. all persons are treated with dignity regardless of their disabilities;
- b. all persons are provided with the same opportunity to make for themselves the lives that they are able and wish to have regardless of their disabilities;
- c. all persons have barrier-free access to full and equal participation in society, regardless of their disabilities;
- d. all persons 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 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 are 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 is done with the objective of achieving the highest level of accessibility for persons with disabilities.

This plan sets out how we intend to identify, remove, and address barriers to accessibility.

## Consultations

### Internal consultations

Pathway engaged with individuals facing accessibility issues and barriers and ask for their guidance and input to create this plan. The principles and framework of the plan were shared with them, and we worked collaboratively to not only meet criteria, but to also create a culture of acceptance and inclusion.

### External consultations

By referencing customer and stakeholder feedback via phone, email, and verbal communication. We were able to consider additional methods to meet our goals of removing accessibility barriers. We believe this perspective from resources outside of the organization allowed us to build a foundation based on honest firsthand experiences and unbiased input.

# Employment

## Recruiting and Selection

### Diversity and Inclusion

At Pathway, we are committed to a diverse and inclusive environment that values and respects the unique talents, experiences and viewpoints of our employees and those seeking job opportunities with Pathway. The diverse thinking and decision-making of our people strengthens our team.

As a company we strive to develop the Best Team to build innovative solutions for our clients, deliver superior results for our stakeholders and customers and positively impact the people and communities we serve. We are accountable for intentionally seeking and selecting the best talent globally, ensuring all employees have opportunities to be successful, seeking out and integrating different points of view, recognizing employees for delivering on their goals and living our values.

### Employment Equity

The Pathway is an equal opportunity employer and is committed to providing equal treatment with respect to employment without discrimination because of race, ancestry, place of origin, citizenship, creed, sex, sexual orientation, age, marital status, family status, disability, colour or ethnic origin as required by the Ontario Human Rights Code. While remaining alert and sensitive to the issue of fair and equitable treatment for all, the Pathway Group has a special concern with the participation and advancement of members of four designated groups that have traditionally been disadvantaged in employment: women, visible minorities, aboriginal peoples and persons with disabilities.

## Barriers and opportunities

- Improve accessibility of Job Descriptions, training materials, and internal communications for employees with disabilities by incorporating adaptive technology (e.g., screen readers, closed captioning for videos). Employees with disabilities have access to a formalized process for developing an Individual Accommodation Plan tailored to their needs which includes their participation in developing the plan, assessment of accommodation need & regular review & update to the plan.
- Inform Job applicants of the availability of accommodation during the recruitment process. Applicants requesting accommodation to be consulted on their specific needs to ensure equitable hiring experience.
- Document return-to-work process to support employees who have been absent due to a disability and require workplace accommodation.
- Consider accessibility needs of employees with disabilities in performance evaluations, career development opportunities, and training programs.
- Increase regular check-ins and anonymous feedback mechanisms specifically focusing on accessibility to ensure continuous improvement.
- Provide training on inclusive hiring practices for HR and recruitment staff, ensuring Pathway actively supports equitable hiring for persons with disabilities.

## Action plan

2024: Disseminate accessibility plan and resource links, provide training on inclusive hiring practices.

2025: Implement periodic check-ins with employees regarding accessibility needs.

2026: Review and update hiring materials to ensure they are accessible for all applicants.

## Built Environment

The built environment refers to the physical facilities at Pathway. Our facilities are handicap accessible and equipped with ramps and an elevator. Automatic doors are present throughout our facility as well.

### Barriers and opportunities

- Consider adding more automatic doors, particularly in areas frequently used by staff and clients with disabilities.
- Provide assistive equipment like carts and more seating options for clients using the data centre.

### Action plan

2024: Assess the feasibility of adding additional automatic doors and increase the availability of assistive equipment.

2025: Begin phased installation of automatic doors in high-traffic areas.

2026: Evaluate data centre accessibility enhancements and make adjustments as necessary based on client feedback.

## Information and Communication Technologies

### Barriers and opportunities

- Implement accessible technology options on public-facing platforms (e.g., website accessibility features for visually impaired users).
- Review existing ICT tools to ensure they meet accessibility standards for internal and client use.

### Action plan

2024: Conduct an audit of all ICT systems to identify accessibility gaps.

2025: Begin implementing prioritized accessibility features identified in the audit, starting with client-facing technologies.

2026: Complete system-wide updates to meet accessibility standards and conduct user feedback sessions to ensure effectiveness.

## Communication other than ICT

### Communication with Persons with Disabilities

When communicating with a person with a disability, Pathway Group of Companies will do so in a manner that accounts for the person's disability.

#### **Assistive Devices**

A person with a disability may provide his/her own assistive device for the purposes of obtaining, using and benefiting from Pathway Group of Companies goods and services that are made available to the public.

#### **Service Animals**

Pathway Group of Companies welcomes people with disabilities who are accompanied by a service animal on the parts of our premises open to the public. If a service animal is excluded by law from the Pathway Group of Companies premises, Pathway Group of Companies will ensure that alternative means are available to enable the person with a disability to access our materials and services.

### **Support Persons**

Pathway Group of Companies is committed to welcoming people with disabilities who are accompanied by a support person. At no time will a person with a disability who is accompanied by a support person be prevented from having access to his/her support person while on our premises. In the event that a fee is charged in relation to a support person's presence on Pathway Group of Companies premises or to attend a Pathway Group of Companies sponsored event, advance notice of the fee will be provided.

### **Training for Staff**

Pathway Group of Companies will provide training to all employees, contractors, clients, volunteers and similar parties and all those who are involved in the development and approvals of customer service policies, practices and procedures. Training will be provided as soon as practicable after an individual assumes responsibilities related to the public and will include the following:

- the purposes of the AODA and the requirements of the Accessibility Standards for Customer Service;
- Information regarding Pathway Group of Companies policies, practices and procedures relating to the customer service standards;
- how to interact and communicate with people with various types of disabilities;
- what to do if a person with a particular type of disability is having difficulty accessing your goods or services;
- how to interact with people with disabilities who use an assistive device, service animal or support person; and
- how to use the equipment or assistive devices that may be available at Pathway Group of Companies.

The amount and format of training will be tailored to suit each person's interactions with the public or his/her involvement in the development of policies, procedures and practices pertaining to the provision of materials and services. Staff will also be trained on an ongoing basis when changes are made to these policies, procedures and practices.

## **Barriers and opportunities**

- Establish protocols to ensure all public-facing communications are accessible to people with various disabilities, such as providing braille or large print options on request.
- Strengthen staff training on communication best practices with persons with disabilities.

## **Action plan**

2024: Train staff on accessible communication methods and establish a process to provide alternative communication formats upon request.

2025: Monitor and evaluate the effectiveness of alternative format requests.

2026: Update training based on feedback to maintain high standards in accessible communication.

# Procurement of Goods, Services, and Facilities

## Barriers and opportunities

- Introduce accessible procurement criteria to ensure suppliers are compliant with accessibility standards.
- Regularly evaluate suppliers' adherence to accessibility requirements as part of contract reviews.

## Action plan

2024: Begin adding accessibility compliance checks in the procurement process.

2025: Conduct a review of current suppliers to confirm they meet accessibility standards.

2026: Establish a supplier scorecard to ensure ongoing adherence to accessibility standards.

# Design and Delivery of Programs and Services

## Barriers and opportunities

- Create accessible versions of program materials to ensure individuals with disabilities can fully participate.
- Ensure feedback from individuals with disabilities is actively solicited and incorporated into service delivery

## Action plan

2024: Develop and implement a process for creating accessible versions of program materials.

2025: Regularly collect feedback from clients on accessibility barriers in service delivery.

2026: Refine program delivery methods based on feedback to address identified accessibility challenges.

# Transportation

Pathway does not offer transportation services. This principle does not apply to the organization.

# Regulatory requirements

Pathway Communications complies with applicable federal and provincial accessibility laws, including the Accessible Canada Act (ACA), to ensure a barrier-free environment for both employees and clients. As an organization providing a broad range of managed services, we are committed to integrating accessibility within our offerings, workplace, and customer interactions. To meet regulatory requirements under the ACA and align with industry standards, Pathway follows these key guidelines:

1. Accessibility in Customer Service
  - We ensure that all customer service touchpoints, both physical and digital, comply with ACA standards. This includes providing accessible service channels for clients to contact us, receive support, and engage with our services. We offer alternative formats and support for clients with disabilities to ensure equal access to Pathway's managed IT, security, and connectivity services.
2. Workplace Accessibility Compliance

- Our employment policies adhere to ACA requirements to ensure a barrier-free workplace. This includes hiring practices, accessibility accommodations, and continuous training to meet or exceed standards in serving and interacting with employees with disabilities. We implement accessible workplace practices within our data centres, Network Operations Centre (NOC), and other facilities, ensuring that our physical and virtual environments support all employees and visitors.
- 3. Accessible Digital Communication and ICT
  - As an MSP and ISP, we recognize the critical need for accessible information and communication technologies (ICT). Our client-facing platforms, including customer portals, websites, and communication channels, are reviewed and maintained in accordance with ACA's ICT requirements. This ensures that Pathway's services are usable by individuals with a wide range of disabilities.
- 4. Continuous Improvement and Feedback
  - Pathway is committed to ongoing compliance with accessibility regulations. We actively seek feedback from clients, employees, and stakeholders to identify and address accessibility barriers. Our Accessibility Feedback Form provides a confidential channel for suggestions, allowing Pathway to continually enhance our accessibility initiatives.
- 5. Data Privacy and Security in Accessibility Practices
  - Given our role as an MSSP, Pathway adheres to strict data security and privacy standards, including those outlined by HIPAA, PHIPA, and PIPEDA, in the context of accessibility. We ensure that accessible data handling practices do not compromise the security of sensitive information while complying with accessibility laws and client expectations.