# JFM ACESSABILITY PLAN

May 2023



- To request a copy of the JFM accessibility plan or,
- To submit your concerns and feedback to JFM accessibility plan, and or
- To contact JFM about accessibility and barriers.

### Please contact

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ACR Accessible Canada Regulations

APT Accessibility Planning Team

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# **ASSESSABILITY PLAN - JFM**

#### STATEMENT OF COMMITTMENT:

The Accessible Canada Act (ACA) and the Accessible Canada Regulations (ACR) require that federally regulated entities prepare and publish accessibility plans, progress reports on the implementation of their plans, and descriptions of their feedback processes.

JFM is committed to working towards full compliance with ACA and ACR. In doing so, JFM affirms its commitment to providing quality services that respect the dignity and independence of persons with disabilities. JFM is committed to ensuring equal access and participation for people with disabilities and is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

JFM believes in integration and is committed to meeting the needs of people with disabilities in a timely manner. In doing so, by removing and preventing barriers to accessibility and meeting accessibility requirements under the Accessible Canada Act (ACA), the Accessible Canada Regulations (ACR) and Canadian Human Rights Act.

JFM, as an organization, is committed to excellence in serving and providing goods, services, or facilities to all customers, including people with disabilities. The JFM accessible customer service policies are consistent with the principles of independence, dignity, integration, and equality of opportunity for people with disabilities.

#### INTRODUCTION

As per the ACA, the foundational principle of "Nothing without us" recognizes that persons with disabilities are equal participants in all areas of life. As such, they should be involved in all policies, programs, practices, and service delivery decisions. This principle informs how JFM approaches its responsibilities under the ACA and its regulations. It would guide the way you identify, remove, and prevent barriers, develop your accessibility plans, receive, and respond to feedback, and measure your progress.

#### The ACA defines a barrier as:

"Anything – including anything physical, architectural, technological or attitudinal, anything that is based on information or communications or anything that is the result of a policy or a practice – that hinders the full and equal participation in society of persons with an impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation."

#### The ACA defines a **disability** as:

"Any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment – or a functional limitation – whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society."

As per Section 6 of the ACA, JFM sets out the following principles of decision-making, including the development of its accessibility plan:

- all persons must be treated with dignity regardless of their disabilities
- 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
- all persons must have barrier-free access to full and equal participation in society, regardless of their disabilities
- all persons must have meaningful options and be free to make their own choices, with support if they desire, regardless of their disabilities
- 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
- persons with disabilities must be involved in the development and design of laws, policies, programs, services, and structures
- 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

JFM accessibility plan is a document respecting our organization's policies, programs, practices, and services in relation to the identification and removal of barriers and the prevention of new obstacles from emerging. Ensuring that the JFM organization's environment, operations, programs, and products are accessible will benefit everyone, including persons with disabilities.

JFM accessibility plans, progress reports, and descriptions of the feedback process would also be available in simple, clear, and concise language, ensuring the plan is easy to read and understand.

As per regulations, JFM will provide copies of accessibility plans in printed form (large print) and electronic formats **within 15** days of a request. Moreover, JFM is obligated to provide audio versions of their plans **within 45** days of a request.

#### ACCESSIBILITY PLANNING IN ACTION

### 1. Accessibility Planning Team

The accessibility planning Team (APT) will include members from management and staff. The members will be from different departments and locations. The APT members will review the situation and inspect their respective areas to identify potential and actual barriers to people with disabilities in all facilities, regulations, policies, programs, practices, and services offered by JFM.

The APT would identify existing barriers to remove and ways to prevent new barriers from emerging in the future. In doing so, making sure that removing a particular barrier never led to new, unintended barriers arising. Multiple perspectives make this process more efficient and meaningful. In addition, APT would reach out to employees, clients, and the public for ideas about improving accessibility within JFM establishments.

The APT will review the findings and prioritize and specify barriers that will be removed or otherwise modified in the coming years within the limits of the financial and human resources available at the JFM. A clear timeline will be identified, explaining which barriers could be addressed in the first twelve months and what other barriers will be dealt with in the coming years.

The APT will review and update the Annual Accessibility Plan, which will be available to staff and the public. The plan will be finalized and approved by management. Additionally, the APT will prepare an annual report detailing the activities conducted in the previous year and activities planned in the future. At least once every quarter, the APC will meet with management to review the progress made, recommend any necessary changes, and present the implementation plan for the next quarter.

Overall, the APC's goal is to make sure that people with disabilities can access all JFM's facilities, regulations, policies, programs, practices, and services without facing any barriers.

#### 2. Consulting persons with disabilities

The ACA and its regulations require consulting persons with disabilities to prepare accessibility plans and progress reports. The APT will ensure that the consultations are designed to be accessible and inclusive by default. The JFM APT team, when possible, involves persons with disabilities in planning your consultations.

APC will also consider that inclusivity and accessibility should consider geographical and cultural considerations. For example, participants from rural or remote locations may need more consistent transportation or Internet access.

APC will plan meetings in the JFM workplace with volunteers and community members. Invite participants well before the meeting date so that you have time to arrange for appropriate accommodation requests.

When planning a meeting, APC will make sure to give participants the opportunity to identify their accommodation needs early in the process, the APC will make sure to allow sufficient time to:

- give participants time to arrange their transportation
- request sign language interpreters and real-time captioning for people who are deaf or deafened and amplification systems for people who are hard of hearing
- arrange for conversion of conventional print material to alternative formats
- provide meeting materials in advance for those who need more time or quiet to gain better comprehension

The APC team will make sure that the participants of the meeting are informed ahead of the meeting about the JFM emergency plans. At the beginning of the meeting, all participants will be briefed about the locations of the nearest emergency exits and what to do in case of an emergency. APC will also consider the mechanism to respond and help participants who will need assistance if there is an emergency evacuation.

#### 3. Staff Training

JFM is committed to training all staff in accessible customer service and other Accessible Canada Act (ACA) and the Accessible Canada Regulations (ACR), as well as aspects of the Canadian Human Rights Act that relate to persons with disabilities.

Training inaccessible customer service is essential because it helps staff to understand how to communicate effectively with persons with disabilities, how to provide accommodations, and how to ensure that all individuals can access the goods and services supplied by JFM. Additionally, training on Accessible Canada Act (ACA) and the Accessible Canada Regulations (ACR) can help staff to understand their legal obligations and responsibilities in relation to accessibility and to identify and remove any barriers that may prevent persons with disabilities from accessing goods and services.

Training on the Canadian Human Rights Act is also essential, as it will help the JFM staff to understand their legal obligations with respect to discrimination and harassment and to recognize and address any issues that may arise in relation to persons with disabilities. In addition, by providing this training to all staff, JFM is demonstrating a commitment to creating a workplace and customer service environment that is inclusive and welcoming for all individuals, regardless of their abilities or disabilities.

### The training will include:

- purpose of the APR and ACA and the requirements of the Customer Service Standards
- Understanding Canadian Human Rights Act
- how to interact and communicate with people with diverse types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services, or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services, or facilities.

JFM will train its staff when hired, after being hired, and when there is any change in the Accessible Canada Act (ACA) and the Accessible Canada Regulations (ACR). In addition, the organization will take the following steps to ensure employees are provided with the training needed to meet current standards and legislation:

- Provide educational or training resources in an accessible format that considers the accessibility needs of a person with a disability.
- Ensure new employees and volunteers complete training within 30 days of employment or placement.
- Keep and maintain a database of the training participant's names and dates of completion.

#### 4. Customer Service Standard

JFM will use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- Goods or services are provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of goods or services to persons with disabilities, and others, are
  integrated unless an alternate measure is necessary, whether temporarily or
  permanently, to enable a person with a disability to obtain, use or benefit from the
  goods or services. Persons with disabilities will be allowed equal to that given to
  others to get, use and benefit from the goods or services.
- People with disabilities may use their assistive devices when accessing our goods, services, or facilities. We ensure that our staff are trained and familiar with various assistive devices we have on-site or provide that may be used by customers with

disabilities while accessing our goods, services, or facilities. A person with a disability who a support person accompanies will be allowed to have that person accompany them on our premises.

- Senior management will establish an Accessibility Planning Committee to present and/or revise required practices and procedures.
- The Accessible Customer Service Policy will be published on our website.
- Notice will be provided on the website, over the phone, or in writing where applicable, and in accordance with the Business Recovery Plan when a Service Disruption occurs and will be done as quickly as possible if the disruption is unexpected.
- A process will be in place to ensure that all feedback collected from clients, staff or the public is reviewed and analyzed to identify potential gaps in customer services and to provide appropriate actions are taken.

#### 5. The Built Environment

Improving the built environment for people with disabilities requires carefully considering their needs and abilities. Improving accessibility at JFM involves creating a space that can be used by people with a variety of abilities and disabilities.

JFM will take steps to build an environment that improves accessibility. The first step to improve accessibility is to audit the JFM environment to identify any barriers that may make it difficult for people with disabilities to navigate or use the space, ensuring that the built environment is accessible to people with disabilities. This includes wheelchair accessibility, appropriate signage, and clear pathways. In addition, APT will ensure that all pathways are wide enough to accommodate wheelchairs and that no obstacles are blocking the way.

APT will audit JFM facilities to look for the need for clear pathways and signage. The clear paths and signage will make it easier for people with disabilities to navigate through the JFM environment.

Lighting and acoustics can have a significant impact on accessibility. Therefore, APT will ensure the JFM environment is well-lit, with no dark areas or glare. Where needed, APC will consider the height of work surfaces and equipment to ensure that they are usable by people with different heights and abilities.

Ramps and auto door openers are essential for people with mobility impairments. JFM will install ramps wherever there are steps and make sure they are wide enough and have a gradual slope.

The possible areas of improvement are not limited to what is mentioned above; this would be a continuous process, primarily driven by the JFM audit of facilities and the recommendations received through meetings with people with disabilities.

### 6. Employment Standards

JFM will notify job applicants and the public that accommodations can be made during recruitment and hiring. In addition, JFM will notify job applicants individually that accommodations are available upon request when they are individually selected to participate in the selection process.

Consulting with job applicants and employees with disabilities is essential in ensuring suitable accommodations are provided. Therefore, the HR department will consult with the applicants and provide or arrange for reasonable accommodation. It is also vital to inform successful applicants of the policies and supports available to employees with disabilities. The HR department will notify successful applicants of policies for accommodating employees with disabilities when making offers of employment. The department will notify staff that supports are available for those with disabilities as soon as practicable after they begin employment.

The department will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- information that is needed to perform the employee's job; and
- information that is generally available to employees in the workplace

Where needed, JFM will also provide customized emergency information to help an employee with a disability during an emergency.

#### 7. Information and Communications Standard

JFM is committed to meeting the communication needs of people with disabilities. To achieve the most effective and efficient access to information for all users, APC will consult with people with disabilities to determine their information and communication needs.

JFM has undertaken the following plans to ensure compliance with this standard:

- A feedback process will be established that is accessible; alternate formats are also available such as telephone, mail, and in-person. These processes will be communicated to the public and are available on our website.
- JFM website will be designed to be user-friendly for people with various needs. People are encouraged to download this free browser, evaluate it against their needs, and contact JFM via email or phone if they require additional information.
- The website will also provide a feature allowing users to change the text size they
  see online to suit their preferences. JFM will review and convert existing emergency
  plans into a format that makes them available in accessible formats (audio) on
  request and in a timely manner.

# TIMELINE

# **Accessibility Planning Committee**

TASK	RESPONSABILITY	TIMELINE	OUTCOME
Establishment of Accessibility Planning Team (APT)	<ul><li>H &amp; S Manager</li><li>Senior</li><li>Management</li></ul>	July 2023	<ul> <li>Accessibility Planning Committee established, and first meeting conducted.</li> <li>Minutes of meeting available for the first APT meeting.</li> </ul>
APT members reviewed the situation and members inspected their respective area to identify potential and actual barriers to people with disabilities.	• APT	September 2023	A list of (physical) barriers identified and available. A timeline finalized, explaining which barriers would be addressed in the first 12 months and what other barriers will be dealt with in the coming years.
APT reviewed regulations, policies, programs, practices, and services offered by JFM.	• APT	December 2023	<ul> <li>JFM policies, procedures, and services reviewed and a document available with detail and recommendations to improve and make changes.</li> <li>Policies/procedures/practices updated, and changes made in line with the ACR/ACA and Canadian Human rights Act.</li> <li>Updated documents available.</li> <li>Staff trained on the updated polices/procedures/practices.</li> <li>Training documents and updated policies/procedures available.</li> </ul>
APT prepared an Annual Accessibility Plan with timelines	• APT	June 2023	Annual Accessibility Plan finalized, approved, and available for staff and public.

APT prepared the annual report detailing the activities conducted in the previous year.	• APT	June 2024	Annual report prepared and available.
APT and management meeting to review progress and plans.	<ul><li>APT</li><li>Management</li></ul>	Each quarter	<ul> <li>Minutes of quarterly APT/management meeting are available.</li> </ul>

# Consulting persons with disabilities

TASK	RESPONSABILITY	TIMELINE	OUTCOME
Meeting planned meetings between APT volunteers and community members (people with disability).	• APT	August 2023	Meeting date finalized.
Invitation sent to participants well before the meeting date so that you have time to arrange for appropriate accommodation requests.	• APT	August 2023	Meeting invitation send.
At the beginning of the meeting, all participants briefed about the locations of the nearest emergency exits and what to do in case of an emergency.	<ul><li>APT</li><li>People with disability</li></ul>	September 2023	Meeting conducted
Meeting conducted and recommendations recorded.	<ul><li>APT</li><li>People with disability</li></ul>	October 2023	<ul> <li>Recommendations finalized (based on the information collected through internal audit and the meeting).</li> <li>Minutes of meeting/final recommendations available.</li> </ul>

# **Staff Training**

TASK	RESPONSABILITY	TIMELINE	OUTCOME
Staff trainings conducted on ACR/ACA and Canadian Human Rights Act.	• APT	September 2023	Staff trained and training documents / database available.

System placed to train new hires on	<ul><li>APT</li></ul>	Ongoing	•	Training on ACR/ACA and Canadian
ACR/ACA and Canadian Human Rights	<ul> <li>H&amp;SN</li> </ul>	/lanager		Human Rights Act is a part of the new
Act during the orientation session.				staff orientation.

# **Customer Service Standard**

TASK	RESPONSABILITY	TIMELINE	OUTCOME
Preparation and made available "Accessible Customer Service Policy" on JFM website.	<ul><li>APT</li><li>Customer Service</li><li>People with disability</li></ul>	October 2023	Accessible Customer Service Policy prepared, approved, and published on JFM website
Setting up a process of collecting feedback – clients/staff/ public/people with disability on accessibility.	<ul><li>APT</li><li>Customer Service</li><li>People with disability</li></ul>	November 2023	<ul><li>SOPs and feedback form prepared.</li><li>Staff trained on SOP.</li><li>Feedback forms available.</li></ul>
The information regularly reviewed and analyzed to identify potential gaps in customer services and to ensure appropriate actions are taken.	APT     Customer Service	Ongoing	<ul> <li>Documents to confirm the quarterly review of the feedback process.</li> <li>H&amp;S Manager presented findings to the APT and management.</li> <li>Changes made as per information collected through the feedback. Getting approval from APT and management.</li> <li>Necessary changes made in the implementation plan.</li> </ul>

# The Built Environment

TASK	RESPONSABILITY	TIMELINE	OUTCOME
APT conducted audit of JFM facilities to look for the need for clear pathways and signage.	• APT	October 2023	Audit conducted and report available.

Review of JFM environment	• APT	November 2023	Audit conducted and report available.
(lighting/acoustic/work surfaces)			
Review of accessibility (door openers/ramps/automatic doors)	• APT	November 2023	Audit conducted and report available.
Review of other possible obstacles in accessibility	<ul><li>APT</li><li>People with disability</li></ul>	Ongoing	Audit - continuous process.

# **Employment Standards**

TASK	RESPONSABILITY	TIMELINE	OUTCOME
The HR department – adding a message in the email mentioning the availability of accommodations for people with disabilities during the recruitment and hiring process.	• APT • HR	July 2023	HR email message mentions about the availability of accommodations for people with disabilities.
HR informing successful applicants of the policies and supports available to employees with disabilities.	APT     HR	July 2023	HR informing applicants of the policies and supports available to employees with disabilities.
<ul> <li>The department conduct consultation with the person requesting to determine the suitability of an accessible format or communication support specifically for:</li> <li>information that is needed to perform the employee's job; and</li> <li>information that is generally available to employees in the workplace</li> </ul>	• APT • HR	Ongoing	An evidence available of a consultative progress is in place to help individuals with disabilities perform at work.
JFM provide customized emergency information to help an employee with a disability during an emergency.	APT     HR	Ongoing	Customized emergency information available and staff with disability aware of the information.

# **Information and Communications Standard**

TASK	RESPONSABILITY	TIMELINE	OUTCOME
APT consulted people with disabilities to determine their information and communication needs.	APT     HR	October 2023	Discussion made; changes made in JFM communication.
A feedback process established, the process communicated to the public and made available on JFM website	• APT	Ongoing	Feedback process in place.
JFM website designed to be user- friendly for people with various needs	• APT	March 2024	JFM website updated and user friendly for people with disabilities.
JFM accessibility plans made available in printed form (large print) and electronic formats available.	• APT	May 2024	JFM accessibility form available in large font.
JFM website available made available in audio versions.	• APT	May 2024	JFM accessibility form available in audio version.