

# **ACCESSIBILTY PLAN**

***June 1, 2023***

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# Introduction

TERAGO values diversity and inclusion and appreciates the contributions made by all. TERAGO is committed to building an inclusive society and providing an accessible environment, physically, socially, and psychologically. All individuals at TERAGO should have access to the resources necessary to complete their jobs in a way that respects the dignity and independence of persons with disabilities.

TERAGO uses a broad definition of “disability,” as defined in the glossary below, acknowledging that it includes neurodiversity and not just physical diversity, and commits to the identification, reduction, and removal of barriers to improve accessibility. In addition to its own commitment and values, TERAGO acknowledges its responsibilities under the [Accessible Canada Act](#) (ACA)<sup>1</sup> and the [Accessible Canada Regulations](#) (regulations).

This Plan will be available in different formats upon request, including large print, braille, or audio. If you require a copy of this Plan in a different format, please see Accountability below for contact information.

## Glossary

ACA	Accessible Canada Act
Accessibility	refers to the design of products, devices, services, or environments for people who experience disabilities
Barrier	means 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
Disability	means 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

## Accessibility Plan Cycle

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<sup>1</sup> The Accessible Canada Act (S.C. 2019, c. 10), available online: <https://laws-lois.justice.gc.ca/eng/acts/a-0.6/>

The ACA and regulations require that federally regulated entities prepare and publish an Accessibility Plan (Plan) and TERAGO is committed to meeting the requirements of existing legislation and to its own policies and goals related to the identification, removal, and prevention of barriers to its people. This Plan will follow a three-year cycle as per the ACA and regulations:

2023: Publish Accessibility Plan with feedback process description

2024: Publish a progress report on implementation of the Plan

2025: Publish additional progress report

In 2026, TERAGO will then publish a revised plan, taking into account the feedback received and progress reported. The cycle will then repeat every three years. Despite TERAGO's best efforts, barriers may still exist and TERAGO will continue to encourage feedback from individuals who encounter barriers, to address concerns appropriately in the progress reports and subsequent Plans.

Personal information in this Plan and processes will be collected, used, disclosed, stored and destroyed in accordance with TERAGO's privacy policy, available online.

## General

### Accountability & Feedback

Any accessibility questions or concerns, or any feedback about accessibility at TERAGO or this Plan, should be sent to the Director, People and Culture:

- via email to [hr@terago.ca](mailto:hr@terago.ca) with "accessibility" in the subject heading
- via telephone at 1-866-837-2461 ext. 5
- via mail:

800-55 Commerce Valley Drive W.  
Thornhill, ON. L3T 7V9

Confidentiality will be protected, and feedback can be anonymous as desired. Unless messages are sent anonymously, receipt of message will be acknowledged as soon as practicable. This feedback process information is available in alternative formats upon request.

### Executive Summary

In its initial assessment, the Accessibility Committee, composed of the People & Culture team and an external consultant, identified potential concerns with accessibility at TERAGO. Barriers were identified under the pillars of (1) employment, (2) the built environment, (3) information and communication technologies (ICT), (4) communication other than ICT, (5) the procurement

of goods, services, and facilities, (6) the design and delivery of programs and services, and (7) transportation. Commitments for the next steps under each of those headings are described below, followed by a summary of the consultations with people with disabilities.

## **Accessibility Statement**

TERAGO is committed to ensuring equal access and participation for all of its employees. TERAGO is committed to providing individuals with resources that promote inclusion, allowing all employees to maintain their dignity and independence.

TERAGO is and will be a workplace committed to the foundational concepts of inclusion, diversity, equity, and accessibility. We value different perspectives and experiences and want to promote inclusivity for all in our workplaces and our lives. The definitions of disability and barrier are broad and variable at TERAGO. We are committed to meeting the needs of people with disabilities in a timely manner. We will do so by identifying, removing, and working to prevent barriers to accessibility and by meeting our accessibility requirements under the ACA.

## **TERAGO Background**

TERAGO provides businesses across Canada with the services they need to keep up with the modern world. Our Mission is to support customer's technology needs while providing exceptional customer service.

## **Process and Plan for Areas Under S. 5 of ACA**

Section 5 of the ACA requires consideration of barriers and accessibility under seven headings or pillars: (A) employment, (B) the built environment, (C) information and communication technologies (ICT), (D) communication other than ICT, (E) the procurement of goods, services, and facilities, (F) the design and delivery of programs and services, and (G) transportation.

A working committee was formed with representatives from People & Culture as well as an external legal consultant to conduct an accessibility assessment. Additional input was solicited from employees identified as people with disabilities and from clients.

TERAGO recognizes that achieving full compliance with the letter and spirit of the ACA will require a steady and sustained effort. This Accessibility Plan will guide the effort through establishing clear objectives and priorities for implementation. This plan lists the items that TERAGO will pursue with available funding.

### **A. Employment**

The Committee assessed accessibility across the employee lifespan, from applying for jobs, to interviewing, to onboarding, to management. The focus of the Accessibility Assessment with respect to the pillar of employment was on the access to employment opportunities for all

potential and current TERAGO employees. Barriers were identified and assessed from a disability perspective, as broadly defined above.

TERAGO already has a number of accessibility-related programs, policies and initiatives for its employees. Comprehensive benefits are available to all employees, including a confidential, external Employee and Family Assistance Program (EFAP). Short- and long-term disability leave is available for employees and an external disability management team assists in the return-to-work process.

Based on the Accessibility Assessment, with respect to the pillar of employment, TERAGO commits to the following plan:

1. **Barrier: Lack of feedback mechanism and measurement for accessibility.**
  - a. Appoint an individual for oversight of accessibility at TERAGO.
  - b. Set up process for feedback about accessibility, both internally and externally.
2. **Barrier: Employment application process is entirely online, and feedback has never been received regarding accessibility of the process.**
  - a. Canvass vendors to address accessibility for process external to TERAGO.
  - b. Evaluate existing system to determine if any changes could be made to make process more accessible.
3. **Barrier: Accessibility-related policies exist but need to be reviewed.**
  - a. Accessibility for People with Disabilities
  - b. Leave of Absence
  - c. Attendance & Hours of Work
  - d. Vaccination
  - e. Communication
  - f. Consider whether additional policies are needed or whether existing policies addressed based on consultations with persons with disabilities:
    - i. Environmental factors:
      1. Scents
      2. Sounds
      3. Allergens
      4. Lighting
    - ii. Support animals

- iii. Other accessibility issues

4. **Barrier:** TERAGO does not have an existing Diversity and Inclusion program.

- a. Consider developing accessibility awareness and inclusion and diversity principles into a leadership training program.
- b. Develop a committee dedicated to IDEA (inclusion, diversity, equity, and accessibility) with a goal of improving the environment for all employees. The committee will:
  - iv. Be a first step in developing less of an “ableist” culture at TERAGO and building awareness of the broad definitions and range of visible and latent and neuro diversity.
  - v. Be involved in developing appropriate training and other education and awareness-building.
  - vi. Set goals, provide education and information, evaluate processes and programs with an aim to reduce stereotypes and barriers in the workplace for all.

## B. The Built Environment

The Committee assessed accessibility from the perspective of the physical environment, noting that there was no evidence of an audit of the physical buildings at TERAGO. Although many employees work remotely for the majority of their work hours, the Committee noted that additional assessment of all TERAGO workspaces would be beneficial.

1. **Barrier:** The physical buildings used by TERAGO have not been specifically examined from an accessibility perspective.

- a. Accessibility committee will assess each TERAGO building, specifically looking at:
  - i. Entrance into the building
  - ii. Movement within the building.
  - iii. Washroom facilities.
  - iv. Signage.
  - v. Other issues raised by employees.
- b. Feedback will be obtained from clients accessing buildings as well as employees to determine if any accessibility concerns remain.



2. **Barrier:** Emergency procedures need to be examined from an accessibility perspective.
  - a. Confirm with OH&S committee that emergency procedures are accessible to people with disabilities, considering:
    - i. Alternative warnings
    - ii. Exit from buildings
    - iii. Other processes.
  - b. Review building leases from an accessibility perspective and, if renewals occur, ensure accessibility concerns are addressed.

### C. Information and Communication Technologies (ICT)

The Accessibility Assessment considered the accessible digital content and technologies used by employees at TERAGO.

1. **Barrier:** Although many meetings are conducted through technology (Teams), there are no standards to address potential barriers for persons with disabilities.
  - a. Assess virtual meeting practices.
  - b. Develop appropriate protocols based on input from persons with disabilities, including cognitive, emotional, and learning disabilities. For example, feedback was obtained from an individual with a mental disability who suggested that audio-only meetings are difficult to attend, and video would be more inclusive. Another person with a disability mentioned heightened anxiety if meetings do not have structure, such as an itinerary. This feedback will be incorporated into the development of appropriate protocols for online meetings.
2. **Barrier:** Workforce Now is the main internal website for employees to gain access to information but has never been assessed from an accessibility perspective.
  - a. Conduct audit of Workforce Now platform.
  - b. Review contract with external provider and confirm that accessibility concerns are addressed.
3. **Barrier:** External website may not be WCAG compliant.
  - a. Confirm with marketing department that external-facing website has been assessed for accessibility using WCAG or similar checklist.
  - b. If not, conduct audit of website for WCAG compliance (or similar).

### D. Communication, other than ICT

TERAGO aims to provide barrier-free services and spaces for persons with communication disabilities. Communications at TERAGO include a telephone line system available to the public.

4. **Barrier: The telephone line system has not been examined from an accessibility perspective.**
  - a. Confirm with marketing and operations to determine accountability and processes for telephone communications.
  - b. Test the telephone system for accessibility issues.
  - c. Seek input from users of the phone system to determine if additional changes are needed to improve accessibility.
5. **Barrier: Quarterly earnings calls such as investors calls may not be accessible.**
  - a. Calls are run through a third-party company and the contract with that vendor should be examined to ensure accessibility concerns are considered.
  - b. Participants should be asked if there are any changes required to the calls.
6. **Barrier: Meeting rooms may not be accessible for all employees and external guests.**
  - a. Boardroom should be assessed for accessibility and a plan developed depending on the issues identified.
  - b. All physical meeting rooms should also be assessed.

## E. The Procurement of Goods, Services & Facilities

TERAGO is committed to purchasing or leasing goods, services, and facilities in an equitable and accessible manner.

7. **Barrier: New Contracts Manager has recently been hired but has not received any specific accessibility awareness training.**
  - a. Accessibility Manager will meet with Contracts Manager and provide training regarding accessibility.
  - b. Contracts Manager will ensure contracts going forward include accessibility concerns are addressed.
8. **Barrier: Existing goods, services and facilities were procured before accessibility legislation was in place and accessibility was not addressed.**
  - a. Seek feedback from existing vendors to determine if any existing barriers need to be addressed by TERAGO.

- b. Seek input from TERAGO supply chain personnel with respect to accessibility of procurement process.
- c. Consider change recommendations based on feedback and input received.

## F. The Design and Delivery of Programs and Services

TERAGO provides internet, networking and managed SD-WAN services to a large number of industries. This involves designing and delivering technological equipment, programs, and services on site as well as remote support.

- 9. **Barrier: Physical equipment is installed on site and requires attendance on various sites. Protocols for accessing sites have not been examined from an accessibility perspective.**
  - a. Accessibility Committee will solicit feedback from the field team to assess accessibility within protocols.
  - b. Accommodation policy will be reviewed for employee accessibility concerns.
- 10. **Barrier: Physical equipment needs to be maintained on site.**
  - a. See above for plans to address worksite accessibility.

## G. Transportation

The transportation pillar aims to provide a barrier-free federal transportation network. Although TERAGO is not in the business of providing any form of transportation, employees in the field may have access to fleet vehicles for work purposes. The transportation pillar was therefore examined for accessibility from the perspective of the field employees using TERAGO leased vehicles.

- 11. **Barrier: Work vehicles are leased, and employees use them for work purposes. These vehicles have not been assessed for accessibility concerns.**
  - a. The Committee will request the Field Services Team to audit available vehicles for accessibility, including size of vehicles, options available, etc.

## Consultations

The Accessibility Committee sent a TERAGO-wide request for input to all of its employees. In that request, the Committee provided the broad definitions of disability found in the legislation and asked for individuals to come forward personally to members of the Committee or anonymously

to the external consultant, with input or a willingness to review a draft plan. Three individuals provided input or reviewed an earlier draft of the Accessibility Plan.

The external consultant also requested general input from contacts external to TERAGO who have experienced functional limitations due to physical or mental disabilities and these individuals provided some insight into areas of concern for all organizations.

TERAGO also asked its clients to provide accessibility feedback to help guide development of the Accessibility Plan by sending out a survey with specific questions involving accessibility concerns.