

POLICY: CA-POL-16-01		PAGE: 1	OF: 3
EFFECTIVE: February 28, 2025	REPLACES POLICY: HR-POL-16-00		
APPROVED BY: Board of Directors	APPROVED ON: February 28, 2025		
OWNER: Chief Relations Officer			
ACCESSIBILITY POLICY			

1. Mission Statement

- 1.1 The policy affirms WDBA's commitment to identify, remove, and prevent barriers to accessibility, and meet WDBA's obligations under the *Accessible Canada Act*.
- 1.2 This policy gives authority to WDBA's Multi-Year Accessibility Plan (2022-2024) and updated versions of the accessibility plan that will be developed thereafter.

2. Scope

- 2.1 This policy applies to the WDBA Board of Directors and Employees. Exceptions to this policy may only be authorized by the Board of Directors.

3. Definitions

- 3.1 Terms not otherwise defined herein, are defined as follows:

Accessibility Commissioner refers to the member of the Canadian Human Rights Commission who is appointed under subsection 26(1) of the Canadian Human Rights Act and that is referred to in that Accessible Canada Act as the "Accessibility Commissioner".

Barrier refers to 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 refers to 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.

Employees means all WDBA employees, including those working with WDBA through a staffing agency and students.

4. Roles and Responsibilities

- 4.1 **Board of Directors** is responsible for the approval of this policy, the initial Multi-Year Accessibility Plan, and updated versions of the policy and plan. The Board of Directors may delegate to the Chief Executive Officer the approval of the initial Multi-Year Accessibility Plan and its updated versions.

- 4.2 **Chief Executive Officer (CEO)** is primarily responsible for ensuring compliance with this policy and the implementation of the initial Multi-Year Accessibility Plan and updated versions of the plan.
- 4.3 **Executives**, under the direction of the CEO, assume overall responsibility for the implementation of this policy within their area of responsibility. This includes creating and maintaining barrier-free service delivery towards persons with disabilities and identifying, removing, or preventing barriers in the recruitment, retention and development of talented employees through equitable and barrier-free practices. Executives are likewise responsible for budgeting the costs associated with delivering accessible formats and communication supports of materials originating from their department.
- 4.4 **Chief Relations Officer and Director, Human Resources** shall:
- 4.4.1 develop and publish, in consultation with persons with disabilities, the initial Multi-Year Accessibility plan and updated versions of the plan no later than the third anniversary of the day on which the plan was last published.
 - 4.4.2 establish a process for receiving feedback from Employees and persons with disabilities regarding WDBA's implementation of its accessibility plans and the barriers encountered by them.
 - 4.4.3 prepare and publish, in consultation with persons with disabilities, progress reports which provide updates to WDBA's implementation of its accessibility plans.
 - 4.4.4 notify the Accessibility Commissioner of the publication of the accessibility plans, progress reports, and description of feedback processes.
- 4.5 **Chief Relations Officer** is responsible for communicating the policy, accessibility plans, progress reports, and description of feedback processes to Employees, persons with disabilities, and members of the broader community.
- 4.6 **Chief Legal Officer** is responsible for continuously reviewing and providing recommendations for updating the policy.
- 4.7 **Employees** are responsible for ensuring that they comply with the *Accessibility Policy* and the accessibility plans.

5. Policy Requirements

- 5.1 WDBA commits to (i) identify and remove barriers and prevent new barriers for persons with disabilities in the priority areas described in the *Accessible Canada Act*, (ii) attain the goal of a fully inclusive workplace, and (iii) achieve and strive to exceed, wherever possible, the commitments to accessibility to Employees, persons with disabilities, data users and clients, as established in the *Accessible Canada Act*. For this purpose, WDBA shall:
- 5.1.1 **Employment.** Identify, remove, mitigate, or prevent barriers in the recruitment, retention, and development of talented employees through equitable and barrier-free practices and offer disability-related employment accommodation throughout all aspects of employment.

- 5.1.2 **Built Environment.** Meet or exceed barrier-free design requirements for its offices and use of office equipment, and goods which adhere to accessibility standards, as developed and revised by Accessibility Standards Canada.
- 5.1.3 **Information and Communication Technologies (ICT).** Focus on adopting, developing, and implementing accessible information technology, including website accessibility.
- 5.1.4 **Communication (other than ICT).** Focus on developing and providing information in accessible format or with communication supports to people with disabilities.
- 5.1.5 **Design and Delivery of Programs and Services.** provide consistent high-quality accessible services in a manner that respects the dignity and independence of persons with disabilities.
- 5.1.6 **Procurement of Goods, Services, and Facilities.** Incorporate accessibility consideration in procurement criteria and planning, where applicable, and ensure that procurement activities and processes are fair and accessible to vendors and that they incorporate accessibility requirements into their bids.
- 5.1.7 **Transportation.** Meet or exceed barrier-free design requirements for its vehicle fleet to adhere to accessibility standards.
- 5.2 WDBA, through Corporate Affairs and External Relations, shall ensure that its private-sector partner complies with applicable accessibility laws and standards relevant to the design, construction, operation, and maintenance of the Gordie Howe International Bridge project, as required in the Project Agreement dated September 28, 2018.
- 5.3 WDBA shall consult people with disabilities when creating and updating its accessibility plans and progress reports.

6. Non-Compliance

- 6.1 Non-compliance with the policy, its procedure and the Accessibility Plan may result in disciplinary action, up to and including termination of employment. In addition, administrative monetary penalties may be imposed under the *Accessible Canada Act* and the *Accessible Canada Regulations*.

7. Policy Review and Frequency

- 7.1 This policy will follow the standard review period of two years, unless required sooner by changes to legislation or operational needs.

8. Cross References

An Act to Ensure a Barrier-Free Canada (Accessible Canada Act)
Accessible Canada Regulations
Canada Human Rights Act
Worldwide Web Consortium Accessibility Guidelines