

NWIC INC. ACCESSIBILITY PLAN (2023 – 2026)

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1. GENERAL

1.1. STATEMENT OF COMMITMENT

NWIC Inc. (“NWIC”) is committed to upholding the “Nothing without us” principle and improving accessibility for individuals with disabilities and complying in accordance with the foundational requirements found in the *Accessible Canada Act* (S.C. 2019, c. 10) (“ACA”), and the *Canadian Radio-television and Telecommunications Commission Act* (R.S.C., 1985, c. C-22) (“CRTC”).

NWIC is steadfast in its dedication to creating an accessible and inclusive environment for all individuals, including those with disabilities. This Accessibility Plan is a dynamic, living document that will be reviewed and updated regularly to reflect our ongoing dedication to accessibility.

We recognize that achieving true accessibility requires continuous effort, engagement, and responsiveness to the evolving needs of our community. Therefore, we will actively seek input from individuals with disabilities and collaborate with accessibility experts to ensure that our policies, practices, and facilities meet the highest standards of inclusivity.

1.2. PURPOSE

The purpose of this Accessibility Plan is to establish how NWIC will address the removal and prevention of barriers in a manner that is consistent with the following principles of the ACA:

- *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; and*
- *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.*

1.3. CONTACT INFORMATION & FEEDBACK PROCESS

NWIC has a feedback process for receiving and dealing with feedback from persons with disabilities and we want to know about any accessibility barriers you have encountered with us or suggestions that may aid in the implementation of our accessibility plan.

Those who wish to provide such feedback are encouraged to and may do so anonymously or with contact info so that we may follow up with you. Anonymous feedback will not generate a follow-up response.

All feedback can be directed to **NWIC Accessibility Attention: Manager, Human Resources**. Any feedback that is in the nature of a complaint will be addressed directly to the complainant, if contact details are provided.

The details of this Feedback Process will be provided on the Companies' website <https://nwic.ca/accessibility> and in a notice that will be posted at the entrances to the NWIC premises.

Feedback can be sent in by any of the following methods:



Phone: 289-724-9935



Email: accessibility@nwic.com



Mail: NWIC Accessibility, Attn: Manager, HR, PO BOX 761, Beamsville, ON L0R 1B0



Social media: Facebook: www.facebook.com/nwicinc & Instagram: @nwicinc

1.4. ALTERNATIVE FORMATS:

You can request alternative formats of this plan, and a description of our feedback process by contacting **NWIC Accessibility c/o Manager, Human Resources** through any of the contact methods listed.

We will provide the following alternative formats withing 20 days of the initial request:

- Print
- Large Print (increased font size)
- Electronic (compatible with adaptive technology)

We will provide the following alternative formats withing 45 days of the initial request:

- Braille
- Audio

1.5. DEFINITIONS

This plan uses the following definitions:

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. (obstacle)

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. (*handicap*)

Accessibility: refers to the design of products, devices, services, or environments for people who experience disabilities

2. CONSULTATIONS

NWIC is dedicated to ensuring that persons with disabilities are actively engaged in the development and review of our Accessibility Plan. This inclusive consultation process was designed to gather a wide range of perspectives and insights to inform our accessibility initiatives by identifying barriers and potential solutions.

The methods of consultation used included:

2.1. INTERNAL CONSULTATIONS:

We created a focus group with staff members who identified as having a disability (or are very close to someone who does) and who were willing to voluntarily have one-on-one conversations or group conversations about barriers and opportunities based on their lived experiences. This group also included staff members involved in Human Resources, Health & Safety, Customer Service & Development. This group is comprised of 6 of 19 staff members, with 50% identifying as having a disability or is close to someone who does.

• Key Findings:

- Greater training/awareness on providing accessible customer service to persons with disabilities would be beneficial.
- Improvements throughout the Company have been made towards a greater understanding of attitudinal barriers, but we need to continue to break down those stereotypes and lack of understanding.
- Improvements to the built environment and parking access.

2.2. EXTERNAL CONSULTATIONS:

Due to our business size, we worked in conjunction with Canadian Association of Wireless Internet Services Providers and conducted two consultations with 10 people with disabilities from across Canada. Participants included people with a variety of disabilities, including blind or low vision, Deaf, ADHD, depression, Tourette's Syndrome, Cerebral Palsy, and more. Some participants use mobility devices, and some do not. Participants were asked a range of questions on the eight areas described under Section 5 of the ACA.

• Key Findings:

- Lack of knowledge on how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or support person.
- Use of non-inclusive language when contacting customer support by phone.
- Need for on-line support chat options and websites with straightforward instructions and compatibility with screen-assisted devices or Teletypewriter relay services.

Additionally, NWIC will begin incorporating accessibility consultations into their new Company Town Hall meetings beginning in the third quarter of 2024 with the goal of providing a platform for open discussions for all staff about accessibility issues within the organization.

3. AREAS DESCRIBED UNDER SECTION 5 OF THE ACA

This section will itemize the seven (7) priority areas under the ACA by highlighting the identification and removal of barriers, and the prevention of new barriers in these areas.

3.1. EMPLOYMENT

NWIC employs 19 staff who work in differing environments. These environments include, in-office, in field, remote from their homes or a hybrid of in-office & remote. This hybrid method helps to eliminate barriers and provides a wide range of flexibility to our employees.

NWIC has established an accommodation process and is continually working to improve workspaces to be more accessible for those living with disabilities. We include accommodation during our recruitment processes and are working to make the interview process more accessible. The barriers outlined below will aid us in improving accessibility for current and future employees with disabilities.

Accessibility Barrier(s):	Action Plan:	Timeline:
Job interviews can be highly stressful and overwhelming for candidates who have certain disabilities.	Offer candidates the option to conduct interviews either remotely or in person, allowing them to choose the date and time that best suits their schedule & needs. This approach ensures they can participate in a comfortable environment and have any necessary supports in place.	Immediately
Job postings, descriptions and requirements can exclude people with disabilities by setting unnecessary requirements (e.g. a driver's license; lifting).	Thoroughly review job requirements to make sure that everything is in fact required to fulfill the role and that inclusive, plain language is used.	2024
Interviews and hiring decisions can include ableist considerations that exclude some people (e.g. eye contact; experience requirements).	Interviewers to receive anti-bias training to eliminate and provide a broader education. We will also create a feedback process for candidates to complete following their interview to assess any barriers they may have encountered.	2024-2025

3.2. BUILT ENVIRONMENT

NWIC has one head office that its employees report to for work. While the office is not customer-facing, there are some client meetings and delivery personnel that visit the office. It is NWIC's goal to work towards creating a barrier-free environment, which includes barrier-free access to the office as well as its amenities.

As a first step to this, NWIC has created several modified workstations that allow employees with differing disabilities to utilize while working in the office. This includes sit-to-stand desks on each level of the office and ergonomic equipment (chairs, keyboards, monitors and mice). However, we recognize the necessity to enhance the accessibility of our office to reduce barriers.

Accessibility Barrier(s):	Action Plan:	Timeline:
No on-site accessible parking spaces available	Create a parking area at the main office entrance that is reserved as accessible parking.	2024
Access to common space & one washroom are currently not barrier-free	Install barrier free ramp at the entryway to the common space. There is access to the washroom through the common space so this will allow barrier-free access to all three spaces.	2024
Unknown access barriers	Will obtain an accessibility audit completed according to current standards.	2025

3.3. INFORMATION AND COMMUNICATION TECHNOLOGIES (ICT)

NWIC utilizes a variety of technologies and digital tools/platforms to conduct its business, which includes the use of our propriety Enterprise Resource Planning (ERP) software, website and social media platforms. While we have taken strides to make these platforms more accessible, we have identified the below barriers to continue to improve our accessibility in this area.

Accessibility Barrier(s):	Action Plan:	Timeline:
Internal applications and technology developed or utilized may have barriers in them.	Consider accessibility when purchasing and/or developing technology and have developers trained on supporting digital accessibility.	Immediately and on-going as new applications are purchased or developed.
Accessibility barriers when using some features on our website and apps. (e.g. drop-down menus, hyperlinks, on-line forms, & PDF's not compatible with screen-assisted devices).	Conduct a customer survey to assess the scope of barriers when using our website and apps.	Customer survey – 2024

	Ensure WCAG 2.1 Level AA compliance is used for future website/app development.	Continual improvement to website and app content will be continually on-going.
Limited internal policies specifying the guidelines & testing requirements to maintain accessibility during the development process.	Create a development policy with accessibility and testing requirements to be adhered to.	2024

3.4. COMMUNICATION (OTHER THAN ICT)

NWIC communicates with staff and its customers through a variety of methods. These include phone, email, intranet, social media, web forms & website postings. Through consultations, we identified certain accessibility barriers and have prioritized those below.

Accessibility Barrier(s):	Action Plan:	Timeline:
Staff knowledge on how to interact inclusively with people with disabilities who use an assistive device or require the assistance of a service animal or support person.	Provide additional training to customer support staff and field service technicians so that they may engage with persons with disabilities in a respectful and inclusive manner.	2024
Website and social media accounts may not be fully accessible. (e.g. no alt text on images, videos without captioning, PDF documents that aren't accessible or provided in an alternative format).	Develop a policy that indicates the correct alternative formats & accessibility features to be used on the website and social media posts. Train staff on accessible communications and inclusive language.	Policy Development – 2024 Staff training – 2024-2025
Employees facing accessibility barriers during Company events	Utilizing the focus group and feedback from our consultations, we will develop an events program guide which will indicate the appropriate procedures to be followed when planning, executing, and following the event.	Guide Development will begin immediately with ongoing reassessments following each company event.

3.5. PROCUREMENT OF GOODS, SERVICES AND FACILITIES

While NWIC procures goods and services from many different vendors, due to its size, there is not a single source (department or person) who is responsible for the procurement process. As such, departments generally procure their own items, as approved by Finance. Due to the nature of an

informal procurement process, accessibility considerations are often not identified before sourcing goods, services or facility items.

Accessibility Barrier(s):	Action Plan:	Timeline:
Limited formal procurement process in place.	Formalize the procurement process to eliminate multiple persons sourcing goods, services, and facility items. Create a procurement policy that identifies potential barriers & addresses accessibility considerations to be taken into account during the procurement process.	Formalize Process – 2024 Create Policy – 2024 -2025

3.6. THE DESIGN AND DELIVERY OF PROGRAMS AND SERVICES

NWIC has always remained steadfast in its commitment to provide service to its customers by utilizing a flexible scheduling model and addressing issues quickly. This allows the customer autonomy around when a service or call back is provided to them and avoids long wait times for on-site service calls, responses to emails, web inquires and voicemails. Providing services under this framework to our customers helps to eliminate some accommodation barriers. For example, where a support person may need to be present, or specific PPE may be required outside of the normal scope.

At the employee-level, NWIC provides workplace accommodation(s) quickly and to the point of undue hardship. Accommodation requests are welcomed and assessed based on the employees' needs.

While we have made good strides in the delivery of accessible programs and services for our customers and staff, our focus group recognized some shortfalls that we will address under our action plan.

Accessibility Barrier(s):	Action Plan:	Timeline:
Shortage of continuous employee development and training	Employees do receive general accessibility training upon hiring, however there is no refresher training currently. Our internal focus group will work with the Manager, HR to create a training matrix which provides for ongoing (or additional training) for accessibility and workplace accommodation to its employees.	2024 -2025

Internal training and development materials are not fully accessible	Review training and development modules/content and ensure that it conforms to accessible standards (pictures, adaptive to screen assistive technology etc.) and is written in plain language.	2025
Scope of customers' accommodation needs	Develop a reference hub for customer service staff and field support technicians that will allow them to better serve the needs of customers with disabilities.	2024-2025

3.7. TRANSPORTATION

NWIC does not run or operate any passenger transportation services; therefore, we have not developed any formal goals in this area.

However, we do provide company vehicles for some staff and are committed to addressing any accessibility needs that may be required on a case-by-case basis and providing accommodation where possible.

4. CONCLUSION

At NWIC, our commitment extends beyond compliance; we strive to foster a culture of accessibility where everyone feels valued, respected, and empowered to participate fully. By integrating accessibility into every aspect of our operations, we aim to set a standard of excellence and serve as a model for other organizations.

Through transparent reporting, regular feedback mechanisms, and proactive change, NWIC will maintain its dedication to creating an environment where all individuals, regardless of ability, can thrive. Our journey towards accessibility is ongoing, and we are determined to make continuous improvements to uphold this vital commitment.