



## Accessibility Policy and Multi-Year Accessibility Plan for National Steel Car (NSC or the Company)

In 2005, the government of Ontario set the goal of a “barrier-free Ontario” for people with disabilities by creating the *Accessibility for Ontarians with Disabilities Act* (“the *Act*” or “*AODA*”). Regulations were developed under *AODA* that set out the actions that organizations, including **National Steel Car Limited (NSC or the Company)**, must take to meet this laudable goal. These Regulations as drafted cover accessibility standards in customer service, information and communications, employment, transportation and the built environment.

**National Steel Car** is committed to helping Ontario become more accessible. **National Steel Car** has already complied with the standards under O. Reg 429/07 (now O. Reg 191/11) – Accessibility Standards for Customer Service – by creating internal policies, practices and procedures which recognize the role **National Steel Car** will play in making Ontario more accessible. These initiatives included the creation of a training program for employees on the *AODA* and how to provide accessible services. **National Steel Car** has also developed a feedback process, via our website ([www.steelcar.com](http://www.steelcar.com)) and in hard-copy form available at our reception desk, for individuals to help ensure that we maintain our high level of accessibility.

This 2014-21 Accessibility Plan outlines the policies and actions that **National Steel Car** will put in place to further improve opportunities for people with disabilities and to comply with the remaining requirements of the *Act*.

### **Statement of Commitment**

**The Company** is committed to treating all people in a way that allows them to maintain their dignity and independence. Building on **National Steel Car’s Customer Services Policy**, **The Company** confirms its belief in integration and equal opportunity. **The Company** is committed to continuing to meet the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Act* and its Regulations.

### **Accessible Emergency Information**

**National Steel Car** is committed to providing its customers and clients with publicly available emergency information, in an accessible way, upon request. **The Company** will also provide disabled employees with individualized emergency response information when necessary.

### **Implementation Timeframe:**

Effective immediately and ongoing.



## Training

**The Company** will provide training to employees and volunteers, every person who participates in developing **National Steel Car's** policy, and every other person who provides good, service or facilities on behalf of **The Company** relating to persons with disabilities. Training will be provided in a way that best suits the duties of **National Steel Car** employees being trained.

**National Steel Car (NSC or the Company)** will take the following steps to ensure employees and volunteers are provided with the training needed to meet Ontario's accessible laws:

- **The Company** will review current training materials to determine whether any existing materials can be built upon and used for *AODA* training;
- **The Company** will provide training as soon as practicable;
- **The Company** will provide training on:
  - (1) The purpose of the *Act* and the requirements of the accessibility standards referred to in the Integrated Accessibility Standard, O. Reg. 191/11 including:
    - How to interact and communicate with persons with various types of disability.
    - How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
    - How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.
    - What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.
  - (2) The requirements of the *Human Rights Code* ("the *Code*") as it pertains to persons with disabilities.
- **The Company** will continue to provide on-going training as required under *AODA* for all new employees and/or if there is a substantial change to **National Steel Car (NSC or the Company)**'s Accessibility or other related policy;
- Records of any training will be maintained; and,
- **The Company** will prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided. Such document will be available on request to the public. Notice of availability will be posted in a conspicuous place or on **National Steel Car (NSC or the Company)**'s website.

### **Implementation Timeframe:**

By January 1, 2015 and ongoing.



## **Information and Communications**

**National Steel Car (NSC or the Company)** is committed to meeting the information and communication needs of persons with disabilities.

**National Steel Car (NSC or the Company)** will take the following steps to make sure all information publicly available is made accessible upon request by **January 1, 2016**:

- **The Company** will respond to such requests for accessible information as soon as practicable;
- **The Company** will consult with disabled customers and clients to determine their specific needs; and,
- **The Company** will provide customers with information in an accessible format, upon request.

If **National Steel Car (NSC or the Company)** is required to give a copy of a document to a person with a disability, **The Company** will, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person, in an accessible format or with communication support,

- (a) in a timely manner that takes into account the person's accessibility needs due to disability; and
- (b) at a cost that is no more than the regular cost charged to other persons.

**National Steel Car (NSC or the Company)** will consult with the person making the request in determining the suitability of an accessible format or communication support.

**National Steel Car (NSC or the Company)** will take the following steps to make any new website and new web content, specific to Ontario, conform to WCAG 2.0, Level A by **January 1, 2014**:

- any new **National Steel Car** website applicable to Ontario will be assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A;
- any new **National Steel Car** web content applicable to Ontario will be assessed and evaluated for accessibility conformance;
- if conformance with WCAG 2.0 Level A is an issue, **National Steel Car** will consult with its internal IT department/an external consultant regarding necessary changes to its new website and new web content so as to come into compliance;
- **National Steel Car** will engage services of its internal IT department/an external website consultant to implement improvements to its website and web content so as to meet the compliance standards.

**National Steel Car (NSC or the Company)** will take the following steps to make any public website and web content specific to Ontario conform to WCAG 2.0, Level AA by **January 1, 2021**:



- **National Steel Car's** Ontario web page will be assessed and evaluated for accessibility to ensure conformance with WCAG 2.0 Level A;
- public web content in Ontario will be assessed and evaluated for accessibility conformance;
- if not in conformance with WCAG 2.0 Level A, **National Steel Car** will consult with its internal IT department regarding necessary changes to bring to the website and web content into compliance;
- services of an external website consultant will be engaged to make the above improvements to the website and web content, if the internal IT department is unable to make the necessary changes; and,
- necessary improvements to the website and content will be made to ensure compliance.

**Implementation Timeframe:**

By January 1, 2014 and ongoing.

**Feedback**

**The Company** will take the following steps to make ensure existing feedback processes are accessible to people with disabilities upon request by **January 1, 2015**:

- make feedback forms accessible on National Steel Car's website;
- advise customers and clients that feedback can be given in person, by mail, by phone, by fax or by e-mail to:

Jessica Carter  
National Steel Car Limited  
Human Resources Department  
600 Kenilworth Avenue North  
P.O. Box 2450  
Hamilton, ON L8N 3J4

Telephone: (905) 544-3311  
Facsimile: (905) 544-1633

E-mail: [jessica.carter@steelcar.com](mailto:jessica.carter@steelcar.com)

- ensure public that supports are available to facilitate the submission of feedback; and,
- commit to responding to feedback as soon as practicable.

**The Company** will collect and respond to client feedback regarding the accessibility of its services to persons with disabilities and the feedback process itself. Feedback and complaints about the manner in which goods and services are provided to customers with disabilities may be made in-person, by telephone, electronically, in writing or by other reasonable methods, in consultation with the disabled person.



**The Company** will ensure that the feedback process under *AODA* is accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, on request. **The Company** has made information relating to the feedback process readily available to the public.

**National Steel Car** has also prepared a document describing the feedback process. Such is available upon request to any person. Notice of the availability of the feedback process and such summary document will be provided by posting information in a conspicuous place on **National Steel Car** premises or by posting on **National Steel Car's** website.

**Implementation Timeframe:**

By January 1, 2016 and ongoing.

**Employment**

**The Company** is committed to fair and accessible employment practices.

**National Steel Car** will take the following steps by **January 1, 2016** to notify the public and staff, upon request, that it will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- include a statement in any job advertisements that **National Steel Car** will hire individuals with disabilities;
- confirm, in any interview, that **National Steel Car** will hire individuals with disabilities;
- notify successful applicants of **National Steel Car's** policies for accommodating employees with disabilities in its offer letter;
- if a job applicant requests accommodation, **National Steel Car** will consult with the employees and make adjustments that best suit his/her needs to the extent required by law;
- include in the **National Steel Car** "New Hire Orientation" training program a section on accessibility, as appropriate;
- advise employees of the above policy;
- advise employees when changing any policies; and,
- review existing policies and procedures and where necessary, augment processes for people with disabilities.

**National Steel Car** will take the following steps to develop and put in place a process for designing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- review existing policies and procedures and if necessary, augment processes for people with disabilities on the development of accommodation plans and return to work processes.



**National Steel Car** will take the following steps to ensure the accessibility needs of employees with disabilities are taken into account if **National Steel Car** is using performance management, career development and redeployment processes:

- review existing policies and procedures amend where necessary.

**National Steel Car (NSC or the Company)** will take the following steps to prevent and remove other accessibility barriers identified:

- assess, review, and alter (if required) policies and procedures to ensure compliance with the *AODA*.

**Implementation Timeframe:**

By January 1, 2016 and ongoing.

**Accessible Formats and Communication Supports for Employees**

**National Steel Car** is committed to providing accessible formats and communication supports for employees with disabilities.

Upon request, **The Company** will provide or arrange for the provision of accessible formats and communication supports for:

- Information that is needed in order to perform an employee's job; and
- Information that is generally available to all employees

Accessible formats and communication supports will be provided:

- In a timely manner
- At no additional cost to the employee
- In consultation with the employee making the request, to determine suitability

**The Company** will notify employees of the availability of accessible formats and communication supports through:

- Employee onboarding materials
- Internal policies
- Ongoing communications (e.g., intranet, HR notices)

Examples of Supports (if requested):

- Large print documents
- Accessible PDFs or Word documents



- Screen-reader compatible formats
- Verbal communication or plain-language summaries
- Captioning or sign language interpretation (where applicable)

Requests for accessible formats and communication supports will be handled in accordance with the organization's Accessible Formats and Communication Supports Procedure.

**Implementation Timeframe:**

Effective immediately and ongoing.

**Design of Public Spaces**

**National Steel Car** will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to its facilities in public spaces. Public spaces at **National Steel Car** include:

- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps and accessible pedestrian signals
- Accessible off street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

**Implementation Timeframe:**

By January 1, 2017 and ongoing.

**Service Disruptions**

**National Steel Car** has put procedures in place to prevent service disruptions to its accessible parts of its public spaces.

In the event of a service disruption, **National Steel Car** will notify the public of the service disruption and alternatives available.

**Implementation Timeframe:**

Effective immediately and ongoing.

**Policy Review**

The Multi-Year Accessibility Plan is a tool for **The Company** to communicate its accessibility initiatives internally and to the public. **National Steel Car** will review and update this Plan at least once every five (5) years. The first version of this Plan will be reviewed no later than **January 1, 2019**.

**Implementation Timeframe:**

By January 1, 2019 and ongoing.



**NATIONAL STEEL CAR LIMITED**

P.O. Box 2450  
Hamilton, ON L8N 3J4

### **For more information**

For more information on this accessibility plan, please contact **Jessica Carter** at:

- Telephone: (905) 544-3311
- Email: [jessica.carter@steelcar.com](mailto:jessica.carter@steelcar.com)

Accessible formats of this document are available free upon request to Jessica Carter.