



**Deloitte Canada**

## **Policy 164 – Accessibility**

### **Introduction**

Deloitte (the “Firm”, “we” or “organization”) has a commitment to our people, our clients, and the communities we serve to meet the accessibility needs of neurodivergent people and people with disabilities in a timely manner. This commitment includes delivering on our client service principles while also providing services in a way that respects the dignity and independence of neurodivergent people and people with disabilities.

This Accessibility policy is supported by the Firm’s AccessAbility Action Plan, Code of Conduct, Shared Values and Ethical Principles, and complies with relevant provincial accessibility legislation. This policy applies to all Firm Members (partners, employees, and where applicable, temporary, contracted, seconded staff, co-op students and the like) as well as independent contractors.

This policy is not intended to replace or substitute the requirements established under provincial accessibility and human rights legislation, nor is it intended to limit the Firm’s obligations owed to people with disabilities that may apply under other legislation or at law. In the event of a conflict between this policy and any accessibility or other applicable legislation, the legislation shall govern. This policy may be modified and/or updated at anytime as necessary and/or at the Firm’s discretion.

### **Policy & Guidance**

#### **1. Our Commitment**

Deloitte is committed to:

- a. ensuring equal access and participation for neurodivergent people and people with disabilities
- b. treating neurodivergent people and people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of neurodivergent people and people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act, Ontario’s accessibility laws, and other applicable provincial laws including human rights legislation.

#### **2. Contact information:**

If you have any questions or inquiries related to Accessibility, please email the Accessibility Office: [caaccessibilityteam@deloitte.ca](mailto:caaccessibilityteam@deloitte.ca)

#### **3. Training**

We are committed to training all Firm Members and volunteers in accessible customer service, other accessibility standards and relevant aspects of applicable human rights legislation that relate to people with disabilities.

In addition, we will train:

- a) people who participate in developing the organization’s policies; and
- b) other people who provide goods, services or facilities on behalf of the organization, as applicable and in accordance with applicable laws.

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

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- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards, as applicable.
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various 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.

We will train every person as soon as reasonably practicable after being hired and provide appropriate training in respect of any changes to the policies. We will maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

**4. Accessibility Plan**

The Firm has developed, maintains and has published its multi-year Accessibility Plan. The Accessibility Plan outlines the Firm’s commitment and strategy to prevent and remove barriers from its workplace and to improve opportunities for neurodivergent people and people with disabilities. The Accessibility Plan will be reviewed and updated at least once every five years and will be posted on the [Deloitte website](#).

**5. Assistive Devices**

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, alternative measures will be used to ensure the person with a disability can access our goods, services or facilities. We will ensure that applicable Firm Members are trained and familiar with various assistive devices we have on site.

**6. Communication**

We will communicate with people with disabilities, in ways that take into account their disability. When speaking to or about people with disabilities, we will use respectful and inclusive language. We will work with the person with disabilities to determine what method of communication works for them.

**7. Use of Service Animals**

We welcome people with disabilities and their service animals, in accordance with applicable law. Service animals are allowed on the parts of our premises that are open to the public, as permitted and in other areas in accordance with applicable law.

When we cannot easily identify that an animal is a service animal, our Firm Members may ask for documentation (template, letter or form) from a regulated health professional that confirms the animal is a service animal and the person needs the service animal for reasons relating to their disability.

Generally, a service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded

- discuss with the visitor another way of accessing goods, services or facilities

## **8. Use of Support Persons**

A neurodivergent person or person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. In certain cases, the Firm might require a neurodivergent person or person with a disability to be accompanied by a support person for the health or safety of the person and others on the premises.

Before making a decision regarding the use of a support person, the Firm will, as appropriate:

- consult with the person to understand their needs
- consider health or safety reasons based on available evidence
- consider privacy and confidentiality
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

## **9. Built Environment and Notice of Disruption**

We will ensure that any aspect of Deloitte facilities intended to facilitate barrier-free access to its good or services are available for use in the intended manner and if such an aspect is unavailable for use, notice of the following be given on:

- the reasons why the aspect is unavailable and an estimate of when the unavailability will cease,
- details of alternate means, if any, available to access the organization's goods or services.

## **10. Feedback Process**

The Firm will continue to manage its process by which Firm Members, clients and members of the public can provide feedback on the Firm's provision of goods and services (including the accessibility of such goods and services) to people with disabilities and whether the feedback process is in compliance with legislated accessibility requirements.

If the Firm Member receives an inquiry about Deloitte's Accessibility plan, policy and procedures, the Firm Member should direct those inquiries to the Accessibility Office: [caaccessibilityteam@deloitte.ca](mailto:caaccessibilityteam@deloitte.ca). The Firm will document actions resulting from feedback and make that documentation available upon request.

## **11. Accessible Formats and Communication Supports**

Upon request, the Firm will provide or arrange for the provision of accessible formats and communication supports for people with disabilities.

The Firm will consult with the person making the request in determining the suitability of an accessible format or communication support.

## **12. Accessible Websites and Web Content**

The Firm will ensure that its public internet websites and web content on those sites conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA, except where it is impracticable or otherwise not required by accessibility legislation.

## **13. Self-service Kiosks**

We will incorporate accessibility features/consider accessibility for people with disabilities when procuring self-service kiosks.

**14. Procurement**

We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-service kiosks. If it is not possible and practical to do so, we will provide an explanation upon request.

**15. Accommodations**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with applicants, as applicable and appropriate, and provide or arrange for suitable accommodation in accordance with applicable law.

We notify successful applicants of policies and processes for accommodating employees with disabilities when making offers of employment.

We notify Firm Members that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee’s accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee’s job; and
- b) information that is generally available to employees in the workplace

We have a process to develop individual accommodation plans for employees.

We have a process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees, in accordance with applicable law.

**16. Emergency Response Information**

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee’s consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee’s disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee’s overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.