



embark

Embark Student Corp.

Multi-Year Accessibility Plan

2022-2026

About this Plan

If you are an individual with a disability, this Multi-Year Accessibility Plan lays out Embark’s policy and commitment statements and illustrates how attention to accessibility is embedded into our organizational practices and procedures.

If you are an employee of Embark Student Corp., it is your responsibility to be familiar with and comply to the policy statements, resources and procedures outlined in this Multi-Year Accessibility Plan.

Overview

In 2005, the Accessibility for Ontarians with Disabilities Act (the “AODA” or the “Act”) passed with the goal of ensuring accessibility by 2025. This legislation addresses a history of discrimination of individuals with disabilities by ensuring that individuals with disabilities have equal access to goods, services, facilities, accommodations, buildings, structures and premises.

The following five key areas of the related standards were developed with involvement of Ontarians with disabilities and are phased in over a 20-year period:

- Built Environment
- Customer Service
- Transportation
- Information & Communications
- Employment

Embark Student Corp. is dedicated to fostering a supportive environment for those with disabilities. We are committed to providing service in a manner that respects the dignity and independence of persons with disabilities. This means more than just meeting our legal obligations through policies and procedures; it means that we strive to meet the unique needs of each person, each and every day. This Multi-Year accessibility plan provides an overview of our policies, our current and future actions and our organizational practices associated to each accessibility standard.

Definitions

For the purpose of this plan and to inform those that work, learn, or receive services at Embark Student Corp., the following definitions apply:

“Disability” means,

- (a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,
- (b) a condition of mental impairment or a developmental disability,
- (c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- (d) a mental disorder, or
- (e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997; (“handicap”)

“Barrier” means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice; (“obstacle”)

Built Environment

At Embark Student Corp., we strive to have physical space environments that demonstrate our commitment to offer safe and barrier-free facilities for our clients, staff, front line sales force and visitors, including those with disabilities.

Where We Are

Embark Student Corp. completed office renovations in March 2020. The office was designed with many guiding principles and standards to make the office accessible to everyone, including persons with disabilities. Embark Student Corp. engaged with staff and design consultants for input on key design concepts around accessibility standards. We will continue to include accessible design elements wherever possible and strive to implement greater accessibility in our office environments in the future.

Our newly renovated offices were designed and built according to the Ontario Building Code, meeting the Design of Public Spaces Standards (Accessibility Standard for the Built Environment)

- Designated accessible parking close to the entrances of our facilities;
- Accessible washrooms available in our facilities;
- Automated doors and door openers at the main entry points to our facilities;
- Signage that promotes visual and informational clarity, a clear sense of way finding, which uses a mix of upper- and lower-case text for ease of reading
- Staff assist those in need to navigate within our facilities;
- Ramps and elevators within our buildings provide accessibility within our multi-level office building

Embark Student Corp. actively monitors the state of its facilities, including accessible elements through our Health & Safety Committee and monthly checklist inspections. In the event that there is a temporary disruption of goods or services, Embark Student Corp. coordinates appropriate notice to the public with information about the reason for the disruption, anticipated duration of the disruption, and information about any available alternative goods or services. Depending on the type of disruption, Embark Student Corp. may enact its Business Continuity Plan (BCP) to inform the public about the disruption.

What's Next

We continue to monitor and look for opportunities to improve physical accessibility as warranted, and will incorporate accessibility design, criteria and features when procuring or redesigning any space owned or leased by Embark Student Corp. We will maintain procedures for preventative and emergency maintenance of the accessible elements in our office space, and upon identification of any issue report to the Office Manager for a timely resolution and emergency maintenance where necessary.

Customer Service

At Embark Student Corp., we deliver a variety of services to our Customers and Front Line Sales Representatives including those with disabilities. Through education, resources and ongoing strategic and process development, we strive to be a Registered Education Savings Plan provider free of barriers for those we serve.

Embark Student Corp. has many policies, practices and procedures in place that provide product and services to persons with disabilities, which are consistent with the following principles:

- Respect for dignity and independence;
- Equality of opportunity to obtain, use and benefit from the goods and services, and;
- When communicating with a person with disability, the company shall do so in a manner that considers the person's disability

Where We Are

Embark Student Corp. has designed and implemented a number of tools and resources that allow staff to provide services to persons with disabilities. Below are a number of ways we work to eliminate barriers for individuals with disabilities:

- A formal complaint process for our staff and our customers to identify accessibility barriers.
- Employee training on accessibility standards and diversity emphasizing respect and consideration for persons with disabilities.
- Online resources for staff that covers the purpose of the Accessibility for Ontarians with Disabilities Act, required standards and tips for effectively communicating with persons with a disability and supporting individuals with assistive devices, service animals or support persons.
- Embark Student Corp.'s corporate policy on accessibility is publicly available through our websites and generally provides that reasonable efforts will be made to provide access to our financial products and services in accordance with the above principles (the "Accessibility Policy").
- Assistive devices and service animals are permitted at our office.
- Support people who accompany a person with a disability are welcome in our office.
- Use of TTY services as needed.
- Emergency procedures have been developed to ensure customers with disabilities are assisted in building emergencies.
- Information about temporary service disruptions is available through publicly posted notifications.

A copy of the Accessibility Policy can be found on: www.embark.ca in a PDF format. The Accessibility Policy is also available in other accessible formats upon request.

What's Next

- Regularly review emergency procedures to ensure customers with diverse abilities are assisted in building emergencies.
- Develop digital services with accessibility at their core, striving for all users to have equal access to information and functionality.
- Work to ensure all online forms are accessible.
- Departmental guidelines that outline standards to follow for removing barriers to access and services.
- Procurement standards outlining how we incorporate accessibility features and criteria into our procurement practices.

Customer Service Accessibility Training

At Embark Student Corp., we have committed to ensure that the following persons have received training on the provision of Embark Student Corp.'s product and services to persons with disabilities;

- All employees;
- All Front Line Sales Force and every person involved in the provision of financial products and services on our behalf; and
- Persons involved in developing our policies

This training includes instruction on the purpose of AODA, how to interact and communicate with people with various types of disabilities who use an assistive device or require the assistance of a service animal or the assistance of a support person.

Where We Are

- Written procedures for providing accessibility standards training that include a summary of the training and details on when training is provided.
- We provide training to all our employees on accessibility related matters.
- For third party service providers that deal with the public, we ensure that they are aware of the requirements of our expectations for accessibility training.
- Embark Student Corp. directly maintains records of the dates training was provided to our employees.
- The first point of contact customer service access points is fully accessible; such as having varied heights at reception counters.

What's Next

- For third-party service providers, we need to ask them to maintain training records, including dates when training was provided and the number of personnel who received training, and provide access to those records to Embark Student Corp. upon request.
- Whenever an amendment is made or deadline approaching, review and ensure training is re-issued in alignment with the legislation and internal policy changes.

Customer Service Feedback Process Regarding Provision of Services to Persons with Disabilities

At Embark Student Corp., receiving feedback from our customers is a top priority.

Where We Are

- A formal complaint process for employees, Front Line Sales Force and our Customers to identify accessibility barriers that require action by the organization.
- Formal tracking of all accessibility concerns we receive and ensure they are handled in our usual process for resolving customer concerns.
- We have a feedback and customer concerns procedure specifically for receiving and responding to feedback regarding how we provide financial products and services to people with disabilities. A copy of the Feedback and Customer Concerns Procedure can be found on www.embark.ca

What's Next

- Regularly review the formal complaint process to ensure it remains accessible.

Notice of Temporary Service Disruptions

At Embark Student Corp., we provide notice of any temporary disruption in facilities or services that people with disabilities usually use to obtain, use or benefit from Embark Student Corp.'s products and services.

Where We Are

- Guidelines in place to provide notice of a temporary disruption in the facilities or services owned by Embark Student Corp. that are typically used by persons with disabilities.
- Provide notice on our internal and external websites that a copy of the policy is available on request.
- Document the steps to be taken in connection with the temporary disruption in facilities or services.

What's Next

- Regularly review steps to be taken in connection with the temporary disruption in facilities or services.

Information & Communication

Embark Student Corp. is committed to accessible communications for persons with disabilities. We incorporate accessibility into our communication tactics, materials and processes to ensure that we can efficiently provide communication and information to individuals with disabilities. Our goal is to provide effective and efficient access to information for all of our employees, customers, sales representatives and visitors to our office.

Where We Are

At Embark Student Corp., we strive to ensure that information is available and accessible to persons with disabilities. This includes websites, intranet sites, communications materials, telephone communications and face-to-face interactions:

- New staff orientation includes information on communicating with disabled persons, highlighting a number of physical, cognitive and personal assistive communicative techniques.
- A process is in place for providing or arranging for suitable alternative formats or communication supports on request.
- Client feedback process is available in accessible formats.
- A centralized area in Customer Service has been tasked with handling all requests for alternative formats and communications support to ensure that the request can be completed in a timely fashion.

What's Next

- Alternate language guidelines include how we provide access to translation services.
- Print guidelines that recommend accessible font size, type, layout, plain language and contrast.
- Public notices on our website, including emergency procedures, planning and public safety, are available in a variety of alternate formats such as large print, HTML and tagged PDFs and/or with communication supports upon request.
- Print guidelines that recommend accessible font size, type, layout, plain language and contrast.
- Staff have resource material to use as a reference when developing and revising documents with accessible content in alternate formats.
- Video production guidelines require the transcription of all video to provide closed captioning.
- We will review our feedback, accessible formats, and communication support current state to find where we can make improvements to how customers or employees can access the support required.

Accessible Websites and Web Content

At Embark Student Corp., we strive to have a web presence that is inclusive of those with disabilities.

Where We Are

- Use of TTY services as needed.
- Our website conforms to WCAG 2.0 Level AA.

What's Next

- Providing training and guidance documents to staff to create, evaluate and enhance accessible PDF documents using Adobe Acrobat Professional.
- Enhance awareness that information is available in accessible formats and/or with communication supports upon request through notifications on the website.

Employment

At Embark Student Corp., we practice non-discriminatory, inclusive and accessible employment standards to attract and retain talented employees. These employment practices enable staff with disabilities to fully participate in all facets of the organization. We are committed to fostering a workplace of inclusion, understanding and accommodation for staff with disabilities.

Where We Are

- Staff receive training on our policies for accommodating employees with disabilities.
- Internal and external applicants are advised of the ability to be accommodated in the recruitment and selection process.
- Individualized plans are in place for staff members with a disability to ensure their safety in the event of an emergency.
- Staff may use assistive devices, support persons and/or service animals to fully participate at work where needed.
- Implemented an intranet with varying degrees of conformance with WCAG levels A, AA, and AAA.
- Implemented an applicant tracking system with the user interface built based on a component library that is designed with accessibility out-of-the-box.

What's Next

- A performance management process that considers the unique accessibility needs of individuals with disability to support them to fully participate in the process.
- Developing a formalized succession planning framework to support career development and advancement that considers the accessibility needs of staff with disabilities.
- Our accommodations policies will be reviewed on a regular basis for any updates required to the process, as needed.