



CYBERSECURITY

# AODA Policy (Accessibility for Ontarians with Disabilities Act)

**Last Updated:** November 2, 2022

**By:** Andrea Bailey, Director of People & Culture



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## 1. Purpose and Commitment

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ISA Cybersecurity Inc. is committed to the objectives underlying the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA"), the purpose of which is to ensure accessibility for persons with disabilities in Ontario with respect to goods, services, facilities, employment, accommodation, and buildings, on or before January 1, 2025.

## 2. About AODA

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The AODA became law in 2005. The *Accessibility Standards for Customer Service*, being Ontario Regulation 429/07 made under the AODA, became law in January 2008 (the "Standards"). The purpose of the *Standards* is to make customer service accessible for people with disabilities.

## 3. Scope

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Everyone within ISA Cybersecurity is expected to uphold this Policy and to work together to provide accessible client service for persons with disabilities. Everyone associated with the company, including but not limited to all officers, directors, employees, volunteers, third-party individuals, and entities who deal with the public on the Company's behalf are bound by this Policy and procedures in this document. These individuals and entities are hereafter referred to as Service Providers.

## 4. Core Principles

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ISA Cybersecurity is committed to aligning our client service policies, practices, and procedures with the core principles of independence, dignity, integration, and equality of opportunity.

## 5. Definitions

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The *principle of independence* means that clients should have the opportunity to choose and not to be influenced, aided, or controlled by others. Clients should be allowed to do things on their own without interference from others unless the client requests assistance.

The *principle of dignity* means that all policies, practices, or procedures should not exclude persons with disabilities from accessing ISA Cybersecurity's services. All clients, including those with disabilities, are to be respected, valued, and treated equally.

The *principle of integration* means that clients with disabilities should be able to benefit from the same services, in the same or similar manner, and in the same place as other clients.

The *principle of equal opportunity* means that customers with disabilities should have the same opportunity to benefit fully from accessing our Company's services.

The Company is committed to providing accessible services to all our clients. We provide services that can be accessed in an equitable manner, as all our clients are equally valued.

## 6. Communication

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Communication is an integral part of the ISA Cybersecurity client service commitment. ISA is dedicated to making all reasonable efforts to consider our clients' disabilities when communicating with them. We clearly understand that communication styles vary and that not all persons with the same disability use the same communication modalities. ISA makes every reasonable effort to ensure that its Service Providers take this into consideration and, when not sure, always ask our clients how best to communicate with them.

ISA Cybersecurity has committed to training its Service Providers on the various communication styles and how best to interact with all our clients with all types of disabilities.

ISA Cybersecurity has made the necessary changes to ensure that our clients are aware that they may communicate with us in any reasonable modality when accessing our services. We are committed to providing communications, invoices and accounts for services rendered in any accessible format that the client may reasonably request, including, for example, hard copy, large print, e-mail, etc. ISA will answer any questions our clients may have about the contents of our invoices in person, by telephone, email, or such other accessible format as they client may reasonably request.

## 7. Assistive Devices

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ISA Cybersecurity is committed to providing accessible services to clients who may use assistive devices. Clients shall have unencumbered access to the assistive devices they bring with them for the purposes of accessing our services.

Service Providers shall not operate or otherwise interfere with a person's personal assistive device unless invited to do so by the person or his/her support person.

ISA Cybersecurity will provide ongoing training to our Service Providers to ensure that they are familiar with the various types of assistive devices that may be used by persons with disabilities when accessing our services.

## 8. Training

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To make certain that the provision of our services remains accessible to clients with disabilities, the ISA Cybersecurity provides training to all its Service Providers and to those responsible within our Company for the development of our customer service policies, practices and procedures.

The training includes the following information:

- (a) a review of the purpose and provisions of the AODA and the *Standards*.
- (b) How Service Providers should best interact and communicate with persons with various types of disabilities.
- (c) How Service Providers should best interact and communicate with persons with disabilities who use assistive devices or are accompanied by support persons, service animals, or guide dogs.
- (d) How Service Providers should best use assistive devices or equipment available on Company premises or otherwise provided by the Company that may help with the provision of services to a person; and
- (e) what to do if a person with a particular type of disability is having difficulty accessing the Company's services.

ISA Cybersecurity understands that appropriate training is a key component in ensuring that the Company continues to provide accessible client service. Accordingly, the Company requires all new employees and Service Providers to complete the appropriate training as soon as practicable after commencing their employment. Moreover, the Company shall provide ongoing training in connection with any changes to our policies, practices and procedures governing the provision of services to persons with disabilities.

The Director, People and Culture will maintain training records, that include the date training was provided, the type of training, and the name of trainees.

## **9. Client Feedback**

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As part of ISA Cybersecurity's commitment to accessible client service, ISA welcomes the opportunity to receive and respond to feedback concerning the way it provides services to person with disabilities. To ensure our process is accessible, we welcome feedback through any of the following methods: in person, in writing, telephone, TTY, e-mail, or using our feedback forms posted on our Company's website.

ISA Cybersecurity is committed to responding to any complaints, questions or other feedback concerning the accessibility of its client service as soon as possible following receipt of same. Unless otherwise requested by the client or person providing the feedback, the Company shall respond using the same method of communication by which the feedback was received.

## **10. Other**

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This Policy will be made available in an alternative format upon request and within a reasonable timeframe once requested.

This Policy shall be reviewed by the Company at least annually and revised as may be necessary from time to time.

Any questions or concerns regarding this Policy or the Company's provision of accessible client service may be directed to our Human Resources team.

# ISA Cybersecurity Inc Multi Year Accessibility Plan

**Last Updated:** November 2, 2022

**By:** Andrea Bailey, Director of People & Culture

## 1. Introduction and Statement of Commitment

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ISA Cybersecurity Inc. is a leading cybersecurity focused organization that is subject to the provisions of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). ISA Cybersecurity Inc. is committed to upholding the objectives of the AODA. As an organization, we are committed to providing a barrier-free environment for persons with disabilities with respect to our goods, services, facilities, employment, accommodation, and building premises.

We are committed to making every reasonable effort to align our client service policies practices and procedures with the core principles of independence, dignity, integration, and equality of opportunity. We will do so by removing and preventing barrier to accessibility and by meeting our accessibility requirements under the AODA.

### 1.1 Revision and Updates

ISA Cybersecurity Inc. will review, revise and update this plan at minimum every 5 years.

## 2. Integrated Accessibility Standards Regulation Requirements

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### 2.1 Customer Service

ISA Cybersecurity Inc. is committed to providing accessible customer service, this means we will provide services to everyone with the same high quality and timeliness.

Item	Activity	Status
1.	Persons with disabilities may use assistive devices and/or support persons in the access of services	Ongoing
2.	Deliver training about the provision of services to persons with disabilities to all employees, coops and persons who provide services on behalf of the organization	Completed and Ongoing. Training is provided to all new ISA employees and coop students. Ongoing training is

		provided in respect to changes in the policy.
3.	Upon request, provide or arrange for information to be presented in accessible format and/or communication supports for people with disabilities, in consultation with the person making the request	Complete and Ongoing
4.	A process is in place to ensure that all feedback collected from clients, staff or the general public is reviewed and analyzed to identify potential gaps in customer services, and to ensure appropriate actions are taken.	Ongoing

## 2.2 Information and Communications

ISA Cybersecurity is committed to making every reasonable effort to consider our clients' disabilities during modes of communication.

Item	Activity	Status
1.	Upon request and in consultation with the person making the request, provide or arrange in timely fashion, information in accessible formats, or provide communication supports for persons with disabilities.	Complete and ongoing. ISA accommodates and makes every reasonable effort to address all requests for accessible formats and communication support.

## 2.3 Employment

ISA Cybersecurity is committed to making our recruitment processes as fair and accessible as possible

Item	Activity	Status
1.	Specify that accommodations are available to people with disabilities upon request during the recruitment and hiring process in relation to materials and processes used	Complete and ongoing. ISA job postings include information about accessibility accommodations

2.	Notify the successful candidate, when making offers of employment verbally and in writing of its policies for accommodating employees with disabilities.	Complete and ongoing
3.	Inform employees of policies supporting employees with disabilities.	Ongoing
4.	Provide updated information on accommodation policies to employees when they occur or at minimum annually via annual policy acknowledgement.	Ongoing
5.	Consult with employees to determine accessibility plan, format or support needed.	Ongoing

Individual Accommodation Plans – ISA Cybersecurity Inc. is committed to producing and providing documented individual accommodation plans to employees.

#### 2.4 Training

ISA Cybersecurity is committed to providing training to all employees on the AODA laws.

Item	Activity	Status
1.	Deliver training about provision of services and facilities to people with disabilities	Complete and ongoing
2.	Maintain record of training, including names or those who completed the training and dates.	Complete and ongoing
3.	Ensure that all new employee complete AODA training within first month of employment	Complete and ongoing

### **3. Contact Details**

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For more information on this accessibility plan, please contact:

ISA Cybersecurity People and Culture Team

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Centre Tower, Suite 1100  
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[AODA Policy \(Accessibility for Ontarians with Disabilities Act\)](#)

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