# ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES – MULTI-YEAR ACCESSIBILITY PLAN

## Part 1: Introduction and Background Information

**KPMG**

KPMG is a Canadian leader in delivering Audit, Tax and Advisory services. KPMG operates in 34 locations across Canada. The firm's more than 700 partners and more than 6000 employees provide crucial services to many top businesses, not for profit and government organizations in Canada. Our people work closely with clients to help manage risks and take advantage of opportunities.

**KPMG's Commitment to an Inclusive and Accessible Work Environment**

> "The fundamental importance of ethics and integrity is reflected in our vision of being a great place for advancing the careers of all our people in a rewarding and fulfilling environment. For all of us, that means a strong sense of inclusion, mutual respect, open and honest communication…"
>
> *Bill Thomas, CEO, Code of Conduct 2013*

KPMG is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Integrated Accessibility Regulation* (the "ISAR") of the *Accessibility for Ontarians with Disabilities Act* ("AODA").

## KPMG's commitment to Accommodation

KPMG is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause KPMG undue hardship.

## Business Case for Accessibility

In an effort to facilitate the full participation of persons with disabilities in all aspects of society, including the achievement of accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises on or before January 1, 2025, the AODA was passed in 2005.

Currently, more than 1.85 million Ontarians or 15.5% of the population have a disability. As our demographic continues to evolve to include an ageing population, this number is expected to rise significantly in the future. Furthermore, a large majority of disabilities have their onset during the prime working years of 18 to 54 – which results in significant relevance for the workplace.

In addition, persons with disabilities also represent a sizeable portion of our economy. Persons with disabilities directly account for $25 billion in the Canadian economy and influence the spending decisions of approximately 12 to 15 million other consumers.

Inclusivity and accessibility are not only legislative requirements; they align with KPMG's core values. Preventing and removing barriers to KPMG's services and in our workplace makes sound business and economic sense. An accessible KPMG allows KPMG to provide services to our communities and retain diverse talent; supporting our firm's competitive advantage.

## Part 2: Accessibility at KPMG

### Accessibility Plan:

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including KPMG, to ensure their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

The ISAR requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website by January 1, 2014. In accordance with the ISAR, KPMG's Multi-Year accessibility plan outlines KPMG's comprehensive strategy to prevent and remove barriers to accessibility.

The objective of the Multi-Year Accessibility Plan is to support KPMG's compliance with the AODA and the ISAR and KPMG's commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

### Barrier Assessment – Methodology:

In accordance with the AODA and with KPMG's commitment to treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for KPMG's people to develop to their full potential, our plan seeks to prevent and remove barriers to accessibility for persons with disabilities.

A "barrier" is anything that prevents a person with a disability from full participating in all aspects of society because of his or her disability. Typical barriers to accessibility encountered by persons with disabilities include Physical / Architectural, Attitudinal, Informational/Communication, Systemic, and Technological barriers.

In an effort to better understand the barriers to accessibility encountered at KPMG, feedback was gathered from relevant stakeholders, including KPMG's people who may have, or have an awareness of, disabilities along with internal subject-matter experts in Diversity and Disability Management.

### Barrier Definitions:

1. **Physical/Architectural**: design elements of a building or a space that cause problems for persons with disabilities.
2. **Attitudinal:** our perceptions of, and how we interact with, persons with disabilities.
3. **Informational/Communication:** things/situations that make it difficult for a person with a disability to give, receive or understand information.
4. **Systemic:** organizational policies or practices that (often unwittingly) restrict the participation of persons with disabilities.
5. **Technological:** poor or inexistent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

## Part 3: Moving Toward Accessibility

### KPMG Accomplishments and Progress to Date:

Consistent with KPMG's objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for KPMG's people to develop to their full potential; we have taken various steps to foster an accessible organization and workplace.

- **Diversity and Inclusion Centre of Excellence – Created 2006**
  Creation of a dedicated Diversity and Inclusion Centre of Excellence within KPMG's Human Resources Centre of Excellence Model. The mandate of Diversity and Inclusion is to provide consultation and subject-matter expertise to support KPMG's goal of an inclusive work environment.

Examples of the Diversity and Inclusion's accomplishments include:

- Accommodation offered to job applicants for interviews
- Accommodation offered for all KPMG hosted events
- Strategic partnership with the Job Opportunity Information Network (JOIN) since 2009 as member of the Business Leaders Network
- **AODA Project Team: Created 2011 (and ongoing)**
  - Cross-functional team created to ensure KPMG's compliance with AODA requirements
- **AODA Customer Service Standard Requirements: Completed January 2012**
  - Creation and Posting of Customer Service – Policy, Procedures & Good Practices
  - Customer Service Training – Mandatory training was completed by all existing KPMG people in Ontario. Customer Service Training is also part of mandatory component onboarding for all new hires in Ontario
  - Customer Service – Feedback Mechanism Posted on KPMG Internet site
- **AODA Individual Emergency Evacuation Procedures: Completed January 2012**
  - All existing and new employees in Ontario who require an individual workplace emergency response plan are provided with an individual plan that takes into account their disability
  - All KPMG people in Ontario are made aware of the availability of individual emergency evacuation plans during the onboarding process both through local and National training
  - Information on how to obtain individual emergency evacuation plans are posted on the Human Resources Website and in local Joint Health and Safety communications posted in a visible location
  - All local office managers, who have oversight of local Health and Safety matters, have received training and resources to understand how to complete and when an Individual Emergency Evacuation plan is required
- **Employee Network Groups: Created 2008**
  - AdaptAbility Network GTA focused employee affinity group which promotes awareness regarding disabilities (*i.e.*, education) – Mental Health Week Sessions, Meetings/Lunch and Learns
  - Special Parent's Network – support and networking group for KPMG parents across Canada who have children with disabilities to meet on a regular basis
- **Disability Management and Return to Work Programs – ongoing**
  - KPMG has a comprehensive and structured disability leave management program. KPMG's practices were featured in Conference Board of Canada's Toolkit to support employers' compliance with AODA Integrated Standard[1].

## Part 4: KPMG Multi-Year Accessibility Plan

### Part I: General Requirements

| Initiative | ISAR Requirement | Action | Commencement | Compliance Date |
|---|---|---|---|---|
| **1.1 Establishment of Accessibility Policies** | Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation. | • Policy complete and posted on KPMG external website and internal HR intranet – onboarding website for Ontario | Completed | January 1, 2014 |

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1 The Conference Board of Canada: *Employer's Toolkit: making Ontario Workplaces Accessible to People With Disabilities* ; December 2012

| Initiative | ISAR Requirement | Action | Commencement | Compliance Date |
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| **1.2 Accessibility Plans** | Large organizations shall, <br><br>(a) establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under this Regulation; <br><br>(b) post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and <br><br>(c) review and update the accessibility plan at least once every five years. | • Established an AODA project team to understand requirements of the ISAR <br>• Creation of AODA track responsible for the creation of KPMG's Accessibility Plan <br>• Team lead responsible for creation of Accessibility Plan attended workshop March 26, 2013 <br>• To inform Accessibility Plan development – Identified barriers by soliciting stakeholder feedback from KPMG Ontario people with disabilities and subject-matter experts <br>• AODA committee to meet ongoing until compliance deadlines have all been met | Completed | January 1, 2014 |
| **1.3 Training** | Every obligated organization shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the *Human Rights Code* as it pertains to persons with disabilities to, <br><br>(a) all employees, and volunteers; <br><br>(b) all persons who participate in developing the organization's policies; and <br><br>(c) all other persons who provide goods, services or facilities on behalf of the organization. | • Establishment of AODA cross-functional team, including members of KPMG Business School, to understand training requirements pursuant to the ISAR <br>• Reviewed current training to determine whether existing training could be leveraged for training required by the ISAR <br>• Determine budget to provide training <br>• Engage with KPMG Business School to develop training program to educate staff and managers on AODA legislation, ISAR and *Human Rights Code* to be rolled out to all KPMG people in Ontario <br>• Assess training needs (*e.g.*, separate training for managers and employee levels) <br>• Determine vehicle to deliver training (*e.g.*, online) <br>• Training will be mandatory and training will be available online <br>• Training to incorporate accessible format – review training modes and materials to | In progress | January 1, 2015 |

| Initiative | ISAR Requirement | Action | Commencement | Compliance Date |
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| | | determine what accessible formats currently exist and what accessible functions may be incorporated in the training design<br>• Determine mechanism for managing and tracking completion of training by KPMG Ontario people | | |

## PART II – Information and Communications Standards

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
|------------|------------------|--------|--------|-----------------|
| **2.1 Feedback** | Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request. | • Through AODA project team, engaged all groups who provide surveys (marketing, Human Resources) to make them aware of ISAR requirements and process for requests for accessible formats – how to escalate<br>• Determine all current feedback surveys and mechanisms at KPMG<br>• Conduct assessment/review surveys of feedback processes to ensure accessible formats and current accessibility features<br>• Review/Update current process Employee Relations Services Team's standard operating procedure (SOP)) for requesting for accessible formats<br>• As needed, update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual<br>• Develop understanding of current accessible formats and information and communication and technology tools available at KPMG to adequately respond to requests for accessible formats that take into consideration the requestor's disability needs | In Progress | January 1, 2015 |

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| **2.2 Accessible Formats & Communication Supports** | 2.2.1 Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,<br>(a) in a timely manner that takes into account the person's accessibility needs due to disability; and<br>(b) at a cost that is no more than the regular cost charged to other persons. | • IT and Marketing to review accessible formats and communication, technology supports currently available at KPMG<br>• Review current process (*i.e.*, ERS SOP, local office ergonomic assessment process) for requesting accessible formats and communication supports<br>• As needed, update current process for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn't meet the needs of the individual<br>• Develop communication strategy for educating KPMG people on the availability of and process for requesting accessible formats and communication supports | In Progress | January 1, 2016 |
| | 2.2.2 The obligated organization shall consult with the person making the request in determining the suitability of an accessible format or communication support. | • Review/update of current ERS Accommodation SOP<br>• Understand functionality of accessible formats and communication supports available to better consult on requests for accessible formats that take into account the individual's disability needs<br>• Develop a process for responding to, approving or declining a request | In Progress | January 1, 2016 |
| | 2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | • Incorporate language in marketing materials and website to advise that, in accordance with AODA, accessible format may be made available on request | In Progress | January 1, 2016 |
| **2.3 Accessible Websites & Web Content** | Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, | • Conducted an assessment current web functionality to ensure compliance and adequate accessibility features<br>• Ensure Technology and Content Owners (IT and Marketing) are aware of ISAR requirements for | Complete<br><br><br><br><br>In progress | **January 1, 2014**<br>New internet websites and web content on those sites must conform with WCAG 2.0 Level |

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| | initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. | existing web content effective January 2012 | | A.<br>**January 1, 2021**<br>All internet websites and web content must conform with WCAG 2.0 Level AA, other than,<br>• success criteria 1.2.4 Captions (Live)<br>• success criteria 1.2.5 Audio Descriptions (Pre-recorded). |

## PART III – Employment Standard

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| **3.1 Recruitment, General** | Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. | • Review of all mechanisms for posting KPMG positions (website, campus posting)<br>• Incorporate language on postings and KPMG career websites to make applicants (internal/external) aware that in accordance with AODA accommodation is available | In Progress | January 1, 2016 |
| **3.2 Recruitment, Assessment or Selection Process** | 3.2.1 During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.<br>3.2.2 If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to | • Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request<br>• Encourage and provide more diversity-related training to Talent Attraction on how to engage in conversations to solicit and handle accommodation requests, in accordance with AODA (how to ask for accommodation – develop scripts)<br>• Educate Talent Attraction on inclusive selection strategies developed by Ontario Human Rights Commission and on how to implement and request support for accommodation related requests (connect with | In Progress | January 1, 2016 |

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| | disability. | ERS), in accordance with AODA <br>• Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA | | |
| **3.3 Notice to Successful Applicants** | Every employer shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities. | • Incorporate in offer letter a section regarding KPMG's accessibility policies and where to access additional information on KPMG internal and external internet | In Progress | January 1, 2016 |
| **3.4 Informing Employees of Supports** | 3.4.1 Every employer shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. | • Develop change and communication strategy to educate and advise KPMG people on KPMG's accessibility policies, plan and processes | In Progress | January 1, 2016 |
| | 3.4.2 Employers shall provide the information required under this section to new employees as soon as practicable after they begin their employment. | • Accessibility policies and processes to be Incorporated in onboarding process for Ontario | In Progress | January 1, 2016 |
| | 3.4.3 Employers shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. | • Develop process and strategy to communicate any policy changes by email and Kworld, posting on HR website | In Progress | January 1, 2016 |

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| **3.5 Accessible Formats and Communication Supports for Employees** | 3.5.1 In addition to its obligations under section 12, where an employee with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for, <br>(a) information that is needed in order to perform the employee's job; and <br>(b) information that is generally available to employees in the workplace. | • Educate employees and Performance Managers (PMs) on the availability of accessible format and communication supports; in accordance with AODA <br>• Educate employees and PMs on process for requesting accessible formats and communication supports <br>• Review current ergonomic assessment process to identify gaps and implement improvements as necessary | In Progress | January 1, 2016 |
| | 3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | • Develop a process for consulting with employees to determine accommodation needs (educate PMs to have conversations and escalate ERS) <br>• Develop a process for advising employee of solution | In Progress | January 1, 2016 |
| **3.6 Workplace Emergency Response Information** | 3.6.1 Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. | • Established process to provide people in Ontario who request, or for whom KPMG is aware of the need for accommodation due to the employee's disability, to receive individualize workplace emergency response information | Completed | January 1, 2012 |

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| | 3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. | • KPMG process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the KPMG person to share the information with those designated to provide assistance in the event of an emergency | Completed | January 1, 2012 |
| | 3.6.3 Employers shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability. | • Upon request, the Local office manager will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible | Completed | January 1, 2012 |
| | 3.6.4 Every employer shall review the individualized workplace emergency response information, <br>(a) when the employee moves to a different location in the organization; <br>(b) when the employee's overall accommodations needs or plans are reviewed; and <br>(c) when the employer reviews its general emergency response policies. | • KPMG process for creating Individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs | Completed | January 1, 2012 |
| **3.7 Documented Individual Accommodation Plans** | 3.7.1 Employers, other than employers that are small organizations, shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. | • Review of current accommodation processes and practices (ERS SOPs) <br>• Develop and operationalize a standard process for the development of individualized accommodation plans; in accordance with AODA | Commence in FY14 | January 1, 2016 |

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| | 3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:<br><br>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.<br><br>2. The means by which the employee is assessed on an individual basis.<br><br>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved.<br><br>4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. | • Create a SOP for the development of documented plans that will incorporate the following elements:<br>– Manner in which employee can request<br>– Under which circumstances medical is required<br>– Who (Manulife) will be assessing the medical provided<br>– Work with Manulife (disability partner) to determine the process for assessing and responding (approve/decline) to individual accommodation plan requests<br>– Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (PM, Manulife) and what information may be shared<br>• Educate KPMG people and People Leaders and Managers on the Accessibility policies and processes and procedures for requesting individual plans<br>• Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA | Commence in FY14 | January 1, 2016 |

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| | 5. The steps taken to protect the privacy of the employee's personal information.<br><br>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.<br><br>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.<br><br>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. | | | |
| **3.8 Return to Work Process** | 3.8.1 Every employer, other than an employer that is a small organization,<br>(a) shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work; and<br>(b) shall document the process.<br>3.8.2 The return to work process shall,<br>(a) outline the steps the employer will take to facilitate the return to work of employees | • Liaise with Manulife to conduct a review of the current return to work process<br>• Update and document return to work process based on gaps and compliance requirements | In Progress | January 1, 2016 |

1| KPMG Accessibility Plan 2014- 2019 | Last Updated January 2014

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| | who were absent because their disability required them to be away from work; and<br>(b) use documented individual accommodation plans, as part of the process. | | | |
| | 3.8.3 The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute. | | In Progress | January 1, 2016 |
| **3.9 Performance Management** | An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities. | • Assess current performance review processes to ensure accessibility features are incorporated (*i.e.*, forms accessible, conversations in plain text).<br>• Ensure updated/new performance management processes to be rolled out incorporate accessibility features<br>• Ensure training or communications to performance managers provides awareness on effective communication strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation | In Progress | January 1, 2016 |
| **3.10 Career Development & Advancement** | An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities. | • Review of current training and professional development materials to determine accessibility features<br>• Ensure all future developed training and materials are developed with accessibility features in mind<br>• Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA<br>• Track career progression of individuals with disabilities | Commence FY14 | January 1, 2016 |

| Initiative | ISAR Requirement | Action | Status | Compliance Date |
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| **3.11 Redeployment** | An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. | • Review and update of current transfer and redeployment practices and processes to ensure accommodation plans are referenced<br>• Educate hiring managers to ensure redeployment efforts/activities take into account the employee's accommodation needs | Commence FY14 | January 1, 2016 |

## Part 5: Closing statements

In accordance with the AODA and with KPMG's objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for KPMG's people to develop to their full potential, the Multi-Year Accessibility plan is posted on KPMG's website and will be reviewed and updated at least every 5 years.

*To learn more about KPMG and the AODA, please click* here.

### For the public:

If you have any questions, or have feedback related to KPMG's Multi-Year Accessibility Plan, please email aodamailbox@kpmg.ca or contact Melanie Kerr, Director of Employee Relations and HR Compliance at (416) 777-8452.

### For KPMG people:

If you have any questions, or have feedback related to KPMG's Mulit-Year Accessibility plan, please contact the Employee Relations Services Team at Employee Relations Services at CA-FM CDN ERS Team, or 1-888-466-4778 or 416-777-8002 option 3.