



2024-2026
ACCESSIBILITY PLAN
Netflash Internet Solutions (“the Company”)



2024-2026 Accessibility Plan

Table of Contents

1. General	2
1.1 Statement of commitment.....	2
1.2 Contact Information & Feedback Process.....	2
1.3 Alternate Formats	2
2. Executive Summary	3
2.1 Definitions.....	3
3. Areas Described under Section 5 of the ACA	4
3.1 The Built Environment	4
3.2 Employment.....	5
3.3 Information and Communication Technologies (ICT)	5
3.4 Communication, other than ICT	6
3.5 The Procurement of Goods, Services and Facilities.....	6
3.6 The Design and Delivery of Programs and Services.....	7
3.7 Transportation.....	7
3.8 Organization Wide Initiatives	7
4. Consultations	8
5. Conclusion	8

1. General

The government of Canada has created the Accessible Canada Act (ACA) to make Canada fully accessible by 2040. Under the ACA, all federally regulated businesses are required to publish a plan on how they will improve their accessibility.

1.1 Statement of commitment

Netflash Internet Solutions (“the Company”), we are committed to an industry that fosters a culture of mutual respect, dignity and inclusivity. We want our Company to be as accessible as possible to our employees, stakeholders and member of the public. Netflash Internet Solutions is firmly committed to meeting all of the obligations of the Accessible Canada Act (ACA) with respect to appropriate accommodation for persons with disabilities.

1.2 Contact Information & Feedback Process

Netflash Internet Solutions welcomes feedback from the public and our employees. We are committed to reviewing the feedback we receive in good faith and to taking steps to address, remove and prevent barriers to accessibility that are identified through this feedback.

We commit to acknowledging feedback received in the same manner it was received, unless sent anonymously, within 72 hours.

You can provide feedback about accessibility, or this plan in a number of ways, by contacting:

Name: Customer Service Manager

Title: Customer Service Manager

E-mail address: accessibility@netflash.net

Phone: 519.741.8167 Extension: 700

Mailing address: 1232 Victoria St N, Kitchener, ON N2B 3C9

Information about how to submit feedback to us is also available on our **public website** at the **following link**: netflash.net/the-fine-print/accessibility-plan/

1.3 Alternate Formats

You can request alternative formats of this plan, and a description of our feedback process by contacting:

Name: Customer Service Manager

E-mail address: accessibility@netflash.net

Phone: 519.741.8167 Extension: 700

Our Accessibility Plan and a description of our accessibility feedback process are available in the following alternate formats:

- Print and large print
- Braille
- Audio format
- Electronic format or
- Other agreed-upon formats.

We will provide the alternative formats within 20 days of the initial request for print, large print, or an electronic format.

We will provide the alternative formats within 45 days for braille or in an audio format.

The Accessibility Plan is available in an electronic format compatible with assistive technology.

- **Link to Accessibility Plan in Accessible PDF Format** - <https://netflash.net/wp-content/uploads/2024/05/Netflash-Accessibility-Plan-2024-2026.pdf>

If you require a copy of this plan in a different format, please contact our accessibility mailbox – accessibility@netflash.net.

2. Executive Summary

When it comes to accessibility, every action counts. This includes how we engage with our employees, customers and members of the public. We live in a diverse nation, serve a diverse customer base and work with a diverse group of people. That is why we are committed to fostering an inclusive, equitable and accessible workplace where all individuals feel valued, respected and supported.

2.1 Definitions

The following definitions apply throughout this plan.

Disability: Any impairment, or difference in physical, mental, intellectual, cognitive, learning, or communication ability. Disabilities can be permanent, temporary, or can change over time.

Barrier: Anything that might hinder people with disabilities' full and equal participation. Barriers can be architectural, technological, attitudinal, based on information or communications, or can be the result of a policy or procedure.

Accessibility: The design of products, devices, services, environments, technologies, policies and rules in a way that allows all people, including people with a variety of disabilities, to access them.

3. Areas Described under Section 5 of the ACA

Netflash Internet Solutions is subject to the Accessible Canada Act (ACA). Beyond following the legislation, we have always been committed to the values of inclusion within our organization. The ACA is an opportunity for our organization to reiterate these values through all the initiatives it implements with its employees and customers.

There are seven priority areas described under Section 5 of the ACA. These areas include:

1. The built environment
2. Employment
3. Information and communication technologies (ICT)
4. Communication, Other than ICT
5. The Procurement of Goods, Services and Facilities
6. The Design and Delivery of Programs and Services
7. Transportation

3.1 The Built Environment

Addressing barriers related to the built environment helps us ensure that individuals using our office have barrier-free access. We will continue to work with our team members and external partners to better understand and address barriers experienced by persons with disabilities.

Netflash Internet Solutions has worked hard to ensure our premise is accessible. In 2018, we had a major renovation in accordance with the Ontario Building Code which contained physical accessibility requirements. Mainly employees, and occasionally customers use our office which we have made accessible in several ways. This includes:

- Automatic doors and wide doorways at entrances to buildings and common areas
- Accessible public washrooms
- Barrier-free paths of travel into and through buildings
- Accessible seating and auditoriums
- Visual fire alarms in auditoriums and hallways

We are aware that our premise does not have an elevator or a stair lift, and while in compliance with the building code, we aim to ensure our premise remains accessible. The goals outlined below will help us improve accessibility of our built environment.

- We will investigate appropriate ramps and/or stair lifts whenever there are staircases to enable mobility for all.

- We will review feedback on the accessibility of our physical spaces when received and make necessary change and repairs in accordance with our budget.
- All of our employees will take training related to accessibility in the built environment.

3.2 Employment

The Employment priority area covers an employee's entire experience at Netflash Internet Solutions. It starts from recruitment; onboarding process and it ends when the individual departs the organization. We have a workforce of approximately 17 employees. Most of our employees are based in Kitchener, Ontario. Since 2020 many employees have worked from home on a hybrid or full-time basis. The goals outlined below will help us to improve accessibility for our current and future employees with disabilities.

- As soon as practicable, we will provide training to all employees on accessibility standards. This training will also include basic principles on employment standards.
- As soon as practicable, we will also provide training to all new hires on accessibility standards.
- We will add a statement to our careers page (or where applicable) encouraging people with disabilities to apply for a job at our Company.
- We will engage external consultants to review our employment process in regards to hiring to find and remove accessibility barriers for job applicants.
- We will work with external consultants to develop and share guidelines on how employees with disabilities can request and receive accommodations.
- We will include information about how job applicants can request and receive accommodations during the hiring process, in our job postings. We will also remind job applicants that they can request accommodations when we contact them for an interview.

3.3 Information and Communication Technologies (ICT)

The ICT priority area relates to the technologies our employees and customers use. Our public website (<https://netflash.net/>) is the main technology that members of the public interact with and features several accessibility measures including numerous pages compliant with WCAG and AAA; however, we are aware that some barriers remain for certain sections within our website. We are dedicated to removing barriers to accessibility on our public website and in our internal technology systems.

Our actions include plans to identify and resolve barriers found in our website, mobile applications (where applicable), networks, and telecommunication used by customers and employees. The goals outlined below will help us to improve digital accessibility.

- We will work with external consultants to determine whether our website meets Web Content Accessibility Guidelines (WCAG) guidelines and Level AA requirements.

- We will ensure the format and layout of our web pages are consistent.
- We will review requirements that are needed for people who are using screen reader technology to ensure our website is accessible.
- We will ensure that all of the documents we publish for the general public are in an accessible format.
- We will ensure all employees will receive training on supporting digital accessibility (communication and information standards).

3.4 Communication, other than ICT

We are committed to providing accessible communications with people with a variety of disabilities. Our employees communicate with one another regularly through phone, e-mail, and in person. We communicate with the public through our main website, email and telephone. The Communication priority area includes print materials, digital communications such as websites, digital materials and other methods of communication are also covered.

We are aware that some document templates may not be accessible as well as images and videos we post on our website do not always offer alternate text or captions and that our employees and customers may not be aware they can request certain types of documents (such as bills and other documents that contain critical information) in alternate formats to meet their accessibility needs. The following goals will help us to improve the accessibility of our communications.

- In short order, we will have a process to meet requests for alternative formats of the documents on our website. Once this process is in place, we will provide documents in print, large print, braille, or audio formats, upon requests.
- We will establish a process to receive feedback anonymously.
- We will ensure all images posted to our websites have alternative text descriptions (the short-written description of an image that helps people who cannot see the image to understand what the image is).
- Educate employees that Microsoft Office and most Microsoft 365 apps have an Accessibility Checker.
- Encourage activating the Accessibility Checker before creating Word Documents, Excel Spreadsheet and other materials to make content easier for people with disabilities to read and edit.
- Ensure accessibility needs are top priority when developing marketing and advertising materials.

3.5 The Procurement of Goods, Services and Facilities

We are committed to ensure our procurement practices address accessibility procurement barriers, and dedicated to ensure that the products and services we buy are as accessible as possible. We are aware that our existing procurement practices may not consistently meet accessibility requirements. The following goals will ensure accessibility is considered when we make a new purchase.

- Will make sure that employees who work on procurement receive training and information on accessibility and look to other departments for best practices on considerations related to procurement.
- We will include accessibility considerations in our procurement policy, procurement checklists, and procurement templates (where appropriate and when practicable).
- We will ensure that best practices for accessibility are embedded in the development or procurement of IT goods and services.

3.6 The Design and Delivery of Programs and Services

This priority area focuses on making all programs and services at Netflash Internet Solutions accessible to all. It involves thinking about persons with disabilities when programs and services are being created. It also requires us to continuously improve our programs and services for persons with disabilities.

At Netflash Internet Solutions, we are committed to providing goods and services in a way that respects the dignity and independence of persons with disabilities. We make every effort possible to respond to customers' unique needs. As such we are very responsive to our customer base, and proud to offer short service windows to all of our customers which considers those with attendants, chronic illnesses, and others. In addition, we train all public-facing employees to provide excellent customer service to all customers.

- We will seek out when appropriate, and review feedback from customers with disabilities to improve our services.
- We will evaluate current training needs, and consider enhancing our training to ensure that outstanding accessible customer support is provided to every customer receiving support.
- We will look into improving our customer responsiveness within end of next business day.

3.7 Transportation

Netflash Internet Solutions has limited involvement with transportation, and as such barriers have not been identified under this priority area. We commit to ensuring that all aspects of accessibility are being considered. If Netflash Internet Solutions becomes more involved with any form of transportation, a full accessibility review will be conducted.

3.8 Organization Wide Initiatives

We will aim to increase employee knowledge, skills, and understanding of accessibility through training that offers timely and continuous learning. Our approach promotes an inclusive culture and equips our employees to take accountability to make sure that their work is inclusive and accessible.

We will continue to promote accessibility across the organization. We will ensure that accessibility events, activities, programs and support resources are promoted and available to all employees.

4. Consultations

Netflash Internet Solutions is fully committed to listening to the concerns of people with disabilities. To ensure we uphold this commitment, in preparation of this accessibility plan we consulted with a focus group of 10 people with various disabilities. They shared their experiences as customers and employees with disabilities.

Also, employees at all levels of Netflash Internet Solutions were consulted for the purposes of informing this accessibility plan. Through these consultations, each person was offered the opportunity to provide anonymized accessibility feedback through a survey in the areas described under section 5 of the Accessible Canada Act. To ensure our employees felt comfortable providing honest feedback, we asked a third-party consultant to assist with consultations. Since we are a smaller company, we invited all employees to participate in our survey.

The third-party consultant also assisted with our Accessibility Plan.

About 60% percent (10 employees) chose to answer the survey. Employees gave feedback about the accessibility of our current office space and provided some suggestions for what should be included.

We used the feedback from people with disability to build this plan. We remain mindful to engage with people with disabilities as we take on new initiatives and projects.

5. Conclusion

Netflash Internet Solutions is dedicated to improving accessibility, addressing current and future barriers to accessibility, and making our operations accessible and accommodating to everyone. Since we support the needs of people in the telecommunication industry across Canada, we want to ensure that accessibility is a priority in everything we do.

We also realize that disability is fluid. Therefore, we will continue to revisit our Accessibility Plan on an annual basis to ensure that barriers to accessibility are addressed on an ongoing basis. We also acknowledge that accessibility is not an outcome but, rather, a process. With that in mind, we will work to meet the needs of our employees and customers with disabilities, and we will continue to improve accessibility moving forward.