



Ontario Pension Board

Corporate Accessibility Policy

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Ontario Pension Board Corporate Accessibility Policy

1.0 Purpose and Application

Under the *Accessibility for Ontarians with Disabilities Act, 2005*, all public and private sector organizations in the Province of Ontario must meet the requirements of accessibility standards established by regulation. This policy establishes Ontario Pension Board's (OPB) accessibility standards for customer service, information and communication, employment and design of public spaces, in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11). The *Accessibility for Ontarians with Disabilities Act, 2005* and its Regulation(s) (including all other standards as may be developed) are collectively referred to hereafter as the AODA.

2.0 Definitions

“Accessible Formats” means any form of large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities in order to conduct business with OPB.

“Assistive Device” means a personal device used to assist persons with disabilities in carrying out activities and accessing OPB's services. Personal assistive devices include walkers, white canes used by people who are blind or who have low vision, note-taking devices, personal oxygen tanks to assist breathing, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes) and computer technologies.

“Career development and advancement” includes adding responsibilities to an employee's current position and/or the movement of an employee from one job to another in the organization that may be higher in pay, provide greater responsibility at a higher level in the organization or any combination of these. For both additional responsibilities and employee movement, it is usually based on merit or seniority, or both.

“Client” means the subset of the general public to whom OPB provides goods, services and facilities in the ordinary course of our business.

“Communication Supports” means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications in order to conduct business with OPB.

“Disability” means:

- a) Any degree of physical 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 impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog, 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;
- 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.

“Extranet website” means a controlled extension of the Intranet, or internal network of an organization to outside users over the Internet.

“Extensive renovation” means where existing interior walls or ceilings or floor assemblies or roof assemblies are substantially removed in an existing building and new interior walls, ceilings, floor assemblies or roof assemblies are installed in the building.

“Guide dog” means a guide dog as defined in section 1 of the *Blind Persons’ Rights Act*.

“Internet website” means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

“Intranet website” means an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.

“New Internet website” means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

“New Intranet website” means either an Intranet website with a new domain name or an Intranet website with an existing domain name undergoing a significant refresh.

“Performance management” means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

“Redeployment” means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

“Service Animal” means any animal used by a person with a disability for reasons related to the disability where it is apparent that the animal is used by the person for reasons relating to his or her disability or where the person provides documentation to that effect.

“Support Person” means a person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to OPB’s goods, services or facilities.

“Web Content Accessibility Guidelines” means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.

“Web page” means a non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent.

3.0 Policy Statement

OPB is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of 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 the accessibility requirements under the AODA. OPB respects and supports the Ontario Human Rights Code.

4.0 Accessible Client Service Policy

4.1 Communication

OPB will communicate with persons with disabilities in ways that take into account their disability and enable them to communicate effectively for purposes of using, receiving and requesting OPB’s goods, services and facilities.

OPB will train its staff and agents who communicate with Clients on how to interact and communicate with persons with various types of disabilities.

4.2 Use of Service Animals

If a person with a disability is accompanied by a guide dog or other service animal, OPB will ensure that the person is permitted to enter any OPB facility with the animal and to keep the animal with him/her unless the animal is otherwise excluded by law.

Where a service animal is excluded by law, OPB will provide other measures to enable the person with the disability to obtain, use and benefit from our goods, services and facilities. If it is not readily apparent that the animal is a service animal, OPB employees

may ask for confirmation of the animal's status. It is not the practice of OPB to unduly limit the access of animals to its premises.

It is the responsibility of the person with a disability to ensure that his/her service animal is under his/her control at all times.

4.3 Use of Support Persons

If a person with a disability is accompanied by a support person, OPB will ensure that both persons are permitted to enter its premises, and that the person with a disability is not prevented from having access to the support person.

OPB may require the person with a disability to be accompanied by a support person when on OPB's premises in the event that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises. This will only occur after consulting with the person with a disability and, after considering the evidence, OPB has determined that a support person is required and that there is no other reasonable way to protect the health and safety of the person with a disability or the health and safety of others on the premises.

4.4 Use of Assistive Devices

OPB will ensure that its employees and agents are familiar with the use of assistive devices available on OPB's or its agent's premises, as appropriate to their duties, and inform its Clients of the assistive devices that are available.

A person with a disability may use his or her own personal assistive devices for accessing or using OPB's goods, services and facilities. Where the person's assistive device poses a health and safety risk to themselves or others on OPB's premises, OPB may request that the person use an alternative means for accessing and using goods, services and facilities, including any available assistive devices OPB has onsite for these purposes.

It is the responsibility of the person with a disability to ensure that his/her assistive device is operated in a safe and controlled manner at all times.

In the event the person using an assistive device cannot access OPB goods, services or facilities, OPB will accommodate the person by using any other temporary measures available and deemed appropriate, such as, but not limited to, providing access to other methods, devices or a Support Person.

4.5 Notice of Temporary Disruptions

OPB will provide notice of temporary disruptions in facilities and services OPB provides to persons with disabilities which support them in obtaining, using and benefiting from OPB's goods, services and facilities. The notice of disruption will include information about the reason for the disruption, its anticipated duration, and a description of any alternative facilities and services that are available. Notice will be made conspicuous and may be displayed at the location of the disruption, on our website, in a mailing or in

a pamphlet. In the event of an unplanned disruption, advance notice may not be possible.

5.0 Information and Communication Policy

5.1 Multi-Year Accessibility Plan and Annual Progress Reports

OPB will draft and make public a Multi-Year Accessibility Plan to improve the accessibility of its goods, services and facilities and meet the compliance requirements of the AODA. OPB will also draft and make public annual progress reports outlining steps taken to meet the goals and objectives of the Multi-Year Accessibility Plan. Both the Multi-Year Accessibility Plan and the annual progress reports will be made available in alternate formats upon request.

5.2 Website Accessibility

Any new internet websites or web-based applications (including when making significant modifications to these) that OPB controls directly or through a contractual relationship that allows for modification of a product will conform to Web Content Accessibility Guidelines Level AA.

Where possible, OPB will publish new web content on its existing Internet website(s) or Intranet website(s) which conforms to Web Content Accessibility Guidelines Level AA. OPB continues to work towards increasing the accessibility of its existing web content, website(s) and web-based applications.

5.3 Alternate Formats Available Upon Request

All organizational information is made available to OPB's Clients, employees and the public in an accessible format or via accessible communication support upon request. OPB will consult with the person making the request to determine the suitability of an accessible format or communication support to be provided. Timeframes for this information will be dependent upon the format requested and will be provided as soon as is practicable.

OPB notifies its Clients and the public about the availability of accessible formats and communication supports through its website(s), through printed materials and through posted notice within OPB's premises.

5.4 Accessible Emergency Information

OPB prepares for emergency situations and develops protocols for the protection of, and assistance to, everyone on OPB's premises during an emergency. Information on OPB's emergency response plans is available to its Clients and the public in an accessible manner upon request.

6.0 Procurement Policy

Accessibility criteria and features are considered in the procurement or acquisition of goods, services or facilities except where it is not practicable to do so. Where applicable, procurement documents will specify the desired accessibility criteria to be met and provide guidelines for the evaluation of proposals in respect of those criteria. If OPB determines that it is not practicable to incorporate accessibility criteria and features when procuring or acquiring specific goods, services or facilities, OPB will provide a written explanation upon request.

7.0 Employment Policy

7.1 Individualized Accommodation of Employees with Disabilities

OPB will review the needs of employees with disabilities who request job-related accommodations. Employees requiring accommodation will be consulted when determining suitable accommodation, including the provision of accessible formats or communication supports. OPB has a written process for the development of documented individual accommodation plans for employees with disabilities. Employees can access the most current version of the Accommodation Policy on the Intranet or request a copy from their Manager.

7.2 Individualized Workplace Emergency Response Information

OPB prepares for emergency situations and develops protocols for the protection of, and assistance to, everyone on OPB's premises during an emergency. Workplace emergency procedures, plans and safety information will be shared with new employees when they start work and this information is available to employees in an accessible format or via accessible communication support at any time upon request. Timeframes for this information will be dependent upon the format requested and will be provided as soon as is practicable.

7.3 Individualized Emergency Response Plans for Employees

All OPB employees with disabilities who may require assistance in an emergency situation are encouraged to identify their accessibility needs to their immediate supervisor or an emergency warden so that individualized emergency accommodation plans can be created. This information will be maintained confidentially, and with the employee's consent will be provided to the individual(s) assigned to provide assistance to them during an emergency.

Individualized emergency response plans will be shared as soon as practicable after the need for accommodation is known, and will be reviewed:

- i. when the employee moves to a different location in the organization;
- ii. when the employee's overall accommodations needs or plans are reviewed; and
- iii. when OPB reviews its general emergency response policies.

7.4 Applicant Accommodation in Recruitment and Selection

OPB will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. Upon request, OPB will make accommodation available in its recruitment process to applicants with disabilities, short of undue hardship. Applicants will also be accommodated, short of undue hardship, when they are individually selected to participate in an assessment or selection process.

7.5 Notice of Accommodation Availability to Employees

In addition to this Corporate Accessibility Policy, OPB has an Accommodation Policy for accommodating employees with a disability. Employees can access the most current version of the Accommodation Policy on the Intranet or request a copy from their Manager. Employees will receive updated information whenever there is a change to existing policies.

OPB will notify successful applicants of its policies for accommodating employees with disabilities when making offers of employment, and provide information about policies used to support employees as applicable after they begin employment as part of the orientation program.

7.6 Accessible Formats and Communication Supports for Employees

Upon request, OPB will provide accessible formats and communication supports to employees with disabilities to permit access to information they need in order to perform their job, as well as information that is generally provided to employees in the workplace. Accessible formats and communication supports will be provided short of undue hardship. The employee will be consulted to determine the suitability of accommodation to be provided or arranged by OPB and these requirements will be documented in individual accommodation plans in accordance with OPB's Accommodation Policy.

7.7 Return-to-Work Accommodation Plans

OPB has an approved process for the development of return-to-work individual accommodation plans for employees returning to work who have been absent due to a disability and who now require accommodation.

7.8 Accommodation in Performance Management, Career Development and Advancement and Re-deployment

OPB will ensure its performance management; career development and advancement opportunities; and redeployment processes are accessible to employees with disabilities. When an employee with a disability requests accessible formats or communication supports, OPB will consult with the employee and provide or arrange for the provision of suitable accommodation, short of undue hardship.

8.0 Training

OPB will provide training to all employees, volunteers, and other persons it engages to deliver goods, services and facilities on its behalf, as well as to any person who is involved in developing OPB policies, as required by the AODA. The amount and format of training will be in relation to the person's level of interaction with OPB's Clients.

The training will include the following information:

- i. a review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- ii. the requirements of the Accessibility Standard(s);
- iii. information on the Ontario Human Rights Code as it relates to people with disabilities;
- iv. instructions on OPB policies, practices and guidelines pertaining to the provision of goods, services and facilities to persons with disabilities;
- v. how to interact and communicate with persons with various types of disabilities, including the provision of alternate formats and communication supports;
- vi. review of different types of alternate formats and accessible communication supports;
- vii. what to do if a person requests information in an alternate format or a communication support;
- viii. how to interact and communicate with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person;
- ix. what to do if a person with a disability is having difficulty accessing OPB's goods, services and facilities; and
- x. information about, and instruction on, the equipment or devices available on OPB or agent premises as appropriate to assist in providing services to persons with disabilities, such as the Bell Relay Service.

Training will be provided to each person according to his or her duties as soon as is practicable. Ongoing training will be provided in connection with changes to OPB's policies, practices and procedures governing the provision of goods, services and facilities to persons with disabilities.

A record of the dates on which training is provided and the individuals to whom it is provided will be maintained.

OPB will review its training policies and programs as new requirements under the AODA become effective.

9.0 Feedback Process

OPB has a feedback process through which persons with disabilities are encouraged to comment on OPB's goods, services and facilities, and their experience in being accommodated with accessible formats and communication supports when requested in order to provide such feedback.

Feedback may be delivered to OPB in person, by telephone, mail, e-mail, facsimile or such other means available to the person. Accessible formats and communication supports will be made available upon request to persons wishing to provide feedback.

Privacy will be respected throughout the feedback process. All feedback will be reviewed for possible improvement in OPB's goods and services and accessibility to its goods, services and facilities. Feedback will be directed to the most appropriate person within OPB for dealing with it and any complaints will be addressed as soon as possible.

Clients can expect an acknowledgment of their feedback to be issued within two business days. The acknowledgment will indicate when the matter will be addressed and when the Client will be notified further in the matter. Communication with the Client will take into account his/her accessibility needs and will be provided in an alternate format or with communication support upon request.

OPB will follow up with any required action within the timeframe noted in the acknowledgement.

The feedback process will be promoted on our website and through other outreach methods. A copy of the feedback process will be available upon request.

10.0 Design of Public Spaces

OPB is committed to ensuring its office layout and relating public spaces are accessible to persons with disabilities. When planning new office space or extensive renovations to existing space, and when within OPB's control, OPB will ensure accessibility is addressed in public spaces such as queuing areas and service counters to facilitate Clients' ability to obtain goods and services. OPB remains committed to ensuring the maintenance of any accessibility elements in its public spaces and will develop and maintain procedures for preventative and emergency maintenance of those elements. OPB will also develop and maintain procedures for temporary disruptions when those elements are not in working order.

11.0 Accessibility Reporting

OPB, as a designated public sector organization, will file accessibility compliance reports every two years in accordance with the requirements set out in Ontario Regulation 191/11.

12.0 Availability of Documents

OPB will provide public notice of the availability of the documents, or the information contained in the documents, required by the Accessibility Standards. Notice of availability will be provided on the website, through printed materials and posted within OPB's premises. Documents will be provided in an alternate format or with

communication support upon request, and in a timely manner that takes into account the person's accessibility needs due to disability.

Policy documents will be provided, consistent with the requirements of the AODA and the Accessibility Standards as may be amended from time to time.

13.0 Inquiries

Any inquiries on this Policy should be directed to:

Kimberly Norton
Director, Compliance
Ontario Pension Board
2200-200 King Street West
Toronto, ON M5H 3X6

Telephone: 416-601-3914 Fax: 416-364-7578 E-mail: Kim.Norton@opb.ca

14.0 Policy Review & Approval

This Policy was approved by OPB's President and CEO on May 1, 2021, retroactive to January 1, 2021.

It will be reviewed at least once every three years and as new requirements under the AODA become effective.

15.0 Effective Date

This Policy is effective January 1, 2021.

16.0 Related and Supporting Documentation

- a) Accessibility for Ontarians with Disabilities Act (2005)
- b) Integrated Accessibility Standards, Ontario Regulation 191/11
- c) Accommodation Policy
- d) Training Policy Regarding Accessibility for Persons with Disabilities
- e) Staff Training and Development Policy and Procedure
- f) Procedure on Providing Notice of Temporary Disruption in Service
- g) Procedures on Providing Service to Persons with Various Types of Disabilities
- h) Procedures on Providing Service to Persons who Rely on the Assistance of a Support Person or a Service Animal
- i) Accessible Client Service Feedback Process
- j) Recruitment and Selection Process
- k) Pay Administration Policy
- l) Return to Work Process
- m) Performance Management Process