OTPP Accessibility Policy

Effective Date: **September 21, 2017**
Next Review Date: **September 21, 2020**

Owner: **Chief Pension Officer**
Chief People Officer
Approval: **Chief Pension Officer**
Chief People Officer
Contact: **Senior Manager, Plan Policy & Research**

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1. Purpose / Applicability

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 the Ontario Teachers' Pension Plan ("OTPP")'s accessibility standards for customer service, information and communication and employment, in accordance with the *Integrated Accessibility Standards* (Ontario Regulation 191/11). *The Accessibility for Ontarians with Disabilities Act, 2005,* and its Regulations (including all other standards as may be developed) are collectively referred to hereafter as the AODA.

OTPP 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.

This document applies to all OTPP employees, Board Members and other personnel engaged by OTPP to provide services.

2. Accessible Policy

OTPP's Policy 'Providing Services to People with Disabilities' took effect January 1, 2012, and can be found on the OTPP intranet website and the corporate website. The 'Accessible Feedback Process' took effect on January 1, 2012 and is posted on the OTPP website.

3. Information and Communication Policy

3.1 Multi-Year Accessibility Plan and Annual Progress Reports

As of January 1, 2014, OTPP will have drafted and made public a Multi-Year Accessibility Plan to improve the accessibility of its goods, services and facilities and meet the compliance requirements of the AODA. OTPP 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.

3.2 Website Accessibility

Where possible, any new internet websites including associated web content and web-based applications will conform to Web Content Accessibility Guidelines W3C (WCAG) 2.0 Level A. OTPP continues to work towards increasing the accessibility of its internet website(s) so that by January 2021 its internet website(s) including associated web content and web-based applications, published after January 2012, will conform to Web Content Accessibility Guidelines W3C (WCAG 2.0) Level AA.

3.3 Alternate Formats Available Upon Request

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

3.4 Accessible Emergency Information

OTPP will provide any publicly available emergency information to its Clients and the public in an accessible manner upon request.

4. Employment Policy

4.1 Accommodation of Employees with Disabilities

OTPP 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.

4.2 Workplace Emergency Response Information

Workplace emergency procedures, plans and safety information are available to employees in an accessible format or via accessible communication support upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

4.3 Individualized Emergency Response Plans for Employees

All OTPP employees with disabilities that may require assistance in an emergency situation are encouraged to identify their accessibility needs to their immediate supervisor so that individualized emergency accommodation plans can be created. This information will be maintained confidentially.

5. Training

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This training will be provided by the Human Resources Department, within three months of personnel's commencement of duties.

Training will include the following:

- The purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the customer service standard

- How to interact and communicate with people with various types of disabilities

- How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person

- What to do if a person with a disability is having difficulty in accessing OTPP's services, OTPP's policies, practices and procedures relating to the client service standard.

Personnel will be trained on policies, practices and procedures that affect the way services are provided to people with disabilities. Personnel will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

OTPP will keep a record of the training provided, including the dates on which the training is provided and the number of individuals to whom it is provided.

6. Monitoring / Oversight Practice

Persons with disabilities are encouraged to comment on the services they receive from OTPP. Feedback may be delivered to OTPP in person, by telephone, mail, e-mail, website, or any other means available to the person.

All feedback will be reviewed for possible improvement in OTPP's services and accessibility to its services. Feedback will be directed to the most appropriate OTPP employee for resolution, 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. Correspondence with the client will take into account their accessibility needs and will be provided in an alternate format upon request. OTPP 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. OTPP will arrange for accessible formats of the feedback process and communication supports upon request.

7. Availability of Documents

OTPP will provide public notice of the availability of the documents required by the Accessibility Standards. Notice of availability will be provided on OTPP's external and internal websites and/or through printed materials to maintain flexibility. Policy documents will be provided, consistent with the requirements of the AODA and the Accessibility Standards.

8. Roles and Responsibilities

The Chief Pension Officer and the Chief People Officer are the owners of this document.

Questions about the Corporate Accessibility Policy, or issues and concerns, should be referred to the Senior Manager, Plan Policy & Research.

This policy is issued by the Chief Pension Officer and the Chief People Officer, and is subject to review at least once every three years.

Appendix A - 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 OTPP.

"Client" means the subset of the general public to whom OTPP provides services 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 OTPP.

"Disability" as defined in the Ontario Human Rights Code 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, 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*.

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

"Website" means a collection of related webpages, images, videos, or other digital assets that are addressed relative to a common Uniform Resources Identifier (URI) and is accessible to the public.