

Providing Services to People with Disabilities

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Owner/Approver: Chief Pension Officer

Chief People Officer

Contact: Senior Manager, Plan Policy & Research

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1. Purpose and Application

This policy establishes OTPP's accessibility standards for client service, in accordance with the *Integrated Accessibility Standards* (Ontario Regulation 191/11). This policy applies to all OTPP personnel.

2. Our Commitment

OTPP's mission is to provide outstanding service and retirement security for our members – today and tomorrow. In fulfilling our mission, OTPP strives at all times to provide its services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our services and allowing them to benefit from the same services as other clients.

3. Definitions

Assistive Device means a personal device used to assist persons with disabilities in carrying out activities and accessing OTPP's services. Personal assistive devices include walkers, white canes used by people who are blind or who have low vision, note-taking devices and personal oxygen tanks to assist breathing.

Client means the subset of the general public to whom OTPP provides services in the ordinary course of our business.

Disability as defined in the Ontario Human Rights Code means:

- (a) any degree of physical disability, 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 coordination, blindness or visual impediment, 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.*

Guide Dog means a guide dog as defined in section 1 of the Blind Persons' Rights Act.

Personnel means all employees, contractors, consultants, students, volunteers, and other individuals who provide direct services for OTPP clients.

Service Animal means an animal used by a person with a disability for reasons relating to his or her disability.

Support Person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

4. Providing services to people with disabilities

OTPP is committed to excellence in serving all clients including people with disabilities and we will carry out our functions and responsibilities in the following areas:

4.1 Communication

We will communicate with people with disabilities in ways that take into account their disability.

We will train personnel on how to interact and communicate with people with various types of disabilities.

4.2 Telephone services

We are committed to providing fully accessible telephone service to our clients. We will offer to communicate with clients by email or other means if telephone communication is not suitable to their communication needs or is not available.

4.3 Assistive devices

We are committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services.

Where a person's assistive device poses a health and safety risk to themselves or others on OTPP's premises, OTPP personnel may request that the person use an alternative means for accessing the services. It is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

4.4 Billing

We are committed to providing accessible invoices to all of our clients. For this reason, invoices will be provided in accordance with a client's stated communication preference (e.g., hard copy, email, secure website).

We will answer any questions clients may have about the content of the invoice in person, by telephone or email.

5. Use of service animals and support persons

We are committed to welcoming people with disabilities who are accompanied by a service animal, on the parts of our premises that are open to the public and other third parties. If a person with a disability is accompanied by a guide dog or other service animal, OTPP will permit the person to enter such parts of our premises with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, OTPP will provide other measures to enable the person with the disability to obtain, use and benefit from the organizations' services.

If it is not readily apparent that the animal is a service animal, OTPP personnel may ask for documentation from a regulated health professional.

We will also train all personnel dealing with clients on how to interact with people with disabilities who are accompanied by a service animal.

We are committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter OTPP's premises with his or her support person and will have access to his or her support person while on our premises.

6. Notice of temporary disruption

OTPP will provide clients with notice in the event of a planned disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be made conspicuous and may be displayed at the location of the disruption, on the website, or in a mailing. In the event of an unplanned disruption, advance notice may not be possible.

7. Training

OTPP will provide training to all personnel.

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.

8. Feedback process

OTPP has a feedback process through which persons with disabilities are encouraged to comment on the services they receive.

Feedback may be delivered to OTPP in person, by telephone, mail, email, facsimile or other means available to the person. All feedback will be directed to the Chief Pension Officer and/or the Chief People Officer, or their delegates, and will be acknowledged within two business days.

Clients may use any of the following feedback channels:

• In person at OTPP's office:

5650 Yonge Street, 3rd Floor Toronto, ON M2M 4H5

Office Hours: Monday to Friday, 8:00am to 5:30pm

• By telephone, facsimile or email:

Member Hotline
Phone
416-226-2700
1-800-668-0105 (toll free)
Fax
416-730-7807
1-800-949-8208 (toll free)
Email
inquiry@otpp.com

• By mail: in writing or through electronic or audio recording.

The feedback process will be promoted on OTPP's website and by notice posted at OTPP's reception area. 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.

9. Modifications to this or other policies

We are committed to developing client service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this or other client service policies before considering the impact on people with disabilities.

10. Policy Governance

This policy is issued by the Chief Pension Officer and/or Chief People Officer. It is overseen by the Senior Manager, Plan Policy & Research, and is subject to review at least once every three years.

11. Roles and Responsibilities

It is the responsibility of all OTPP personnel to review this policy and comply with its requirements. It is the responsibility of the Chief Pension Officer to file the required compliance report with the Ministry of Community and Social Services.

The Senior Manager, Plan Policy & Research is expected to provide guidance on providing services to people with disabilities in accordance with this policy, to all persons engaged to deliver services to clients and all those who are involved in the development and approvals of client service policies, practices and procedures.

The Chief Pension Officer and/or the Chief People Officer, or their delegates, is responsible for analysis of feedback in accordance with the Feedback Process and annual reporting to the Senior Executive.

It is the responsibility of the Senior Manager, Plan Policy & Research, Client Services to conduct a triennial review of the Policy and report to the Chief Pension Officer and/or the Chief People Officer.

The General Counsel, or delegate, is responsible for keeping the Senior Manager, Plan Policy & Research updated about developments in the legal and statutory environment that may impact OTPP's practices with respect to providing services to people with disabilities.

12. Questions about this Policy

This policy exists to achieve service excellence to clients with disabilities. Questions about the policy, or issues and concerns, should be referred to the Senior Manager, Plan Policy & Research, or delegate. Issues and concerns may be further escalated to the Chief Pension Officer.