



ACCESSIBILITY POLICY

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1 PREAMBLE

The Government of Ontario (the “**Government**”) protects the rights of persons with Disabilities and promotes their full societal inclusion. It is the goal of the Government, as supported and legislatively affirmed in the *Human Rights Code*, the *Ontarians with Disabilities Act, 2001* (“**ODA**”), and the *Accessibility for Ontarians with Disabilities Act, 2005* (“**AODA**”), to make Ontario fully accessible to all individuals by 2025. As we move closer to that date, goods, services and facilities will become more accessible and responsive to the needs of persons with Disabilities.

Pursuant to the AODA, five accessibility standards have been developed and legislated through the Integrated Accessibility Standards Regulation 191/11. The standards focus on customer service, information and communications, employment, transportation and design of public spaces (built environment).

This Accessibility Policy (the “**Policy**”) complies with and supports legislated requirements of the AODA and the above Regulations.

2 PURPOSE

The purpose of this Policy is to establish and maintain an organizational framework to advance accessibility for Ontarians with Disabilities with respect to customer service, information and communications, employment, transportation and design of public spaces (built environment) as provided for in the AODA.

3 APPLICATION

This Policy applies to all Employees of Ontario Infrastructure and Lands Corporation (“**Infrastructure Ontario**” or “**IO**”). The scope of the Policy is limited to IO’s central and regional corporate offices.

4 DEFINITIONS

“Assistive Device” means specialized equipment used by or provided for persons with a Disability including but not limited to TTY Machines, text to text devices, mobility aids such as wheelchairs, walker portable oxygen tanks, automatic door openers, elevators, lifting devices and emergency evacuation chairs.

“Disability” 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 co-ordination, 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*.

“Employee” means an individual who performs full-time or part-time work directly for IO for monetary compensation. For clarity, independent contractors are not “employees” for the purposes of the Policy.

“FIPPA” means *Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c. F. 31.

“Guide Dog” means a dog trained as prescribed by the *Blind Persons’ Rights Act* as a guide for a person who is blind.

“Mobility Aid” means an Assistive Device that enhances a person’s ability to move and includes such things as wheelchairs, scooters, crutches, walker and canes.

“Service Animal” means an animal used by a person with a Disability if:

- (a) the animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- (b) the person provides documentation that is compliant with the AODA confirming that the person requires the animal for reasons relating to Disability.

“Service Provider” means organization that provides goods and/or services on behalf of IO acting in its corporate capacity.

“Support Person” means a person who accompanies a person with a Disability to assist with communication, mobility, personal care or facilitates access to goods or services provided by IO or a Service Provider.

“TTY Machine” means an assistive tele-type device that allows users to send and receive typed messages across phone lines.

5 POLICY STATEMENT

Infrastructure Ontario is committed to advance accessibility with respect to goods, services, facilities, accommodation, employment, buildings, structures and premises for Ontarians,

including people with Disabilities, based on human rights principles of dignity, integration, equal opportunity, participation and independence.

IO will lead change by:

- working collaboratively to identify and implement solutions that respect the dignity and independence of all individuals;
- adopting progressive and innovative measures to support Ontario's accessibility legislation;
- treating accessibility as a foundation design element in new construction and major renovation;
- improving the level of accessibility in existing buildings;
- balancing accessibility, security, greening initiatives and heritage conservation;
- continuously improving IO's accessibility planning process in consultations with persons with Disabilities;
- preparing annual updates on what has been done to achieve our accessibility plans and regularly reporting on compliance with the AODA.

6 POLICY REQUIREMENTS

6.1 Customer Service

6.1.1. Information and Communications

IO Employees will communicate with all customers in a courteous manner taking into account any accommodating measures that may be required. This means Employees will communicate in a manner that enables all customers to communicate effectively for purposes of requesting, receiving and using IO goods and services.

IO will provide fully accessible telephone service to all customers. IO Employees are expected to communicate with customers over the telephone by speaking directly, clearly and using clear and plain language.

IO will offer to communicate with customers using alternate methods such as in person, by email and/or by TTY Machine if telephone communication is not feasible or if another method of communication is preferred.

6.1.2. Accessible Website

IO will make its internet and intranet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (“WCAG”) 2.0, Level AA.

IO will ensure that all internet websites and web content conform with WCAG 2.0, Level AA, if practicable, by January 1, 2021.

6.1.3. Assistive Devices and Mobility Aids

IO Employees will serve people that use Assistive Devices or Mobility Aids, to obtain, use or benefit from IO’s goods and services. IO will ensure that Employees and Service Providers are trained and familiar with various Assistive Devices and Mobility Aids that may be used by customers while accessing IO’s goods or services.

IO will train Employees on the use of Assistive Devices available on IO’s premises for customers, such as:

- TTY Machine
- text to text devices
- hearing assist systems
- any other assistive devices available on premises

IO Employees shall not touch or interfere with a person’s Mobility Aid except in response to a request for assistance from the person using the Mobility Aid.

6.1.4. Support Persons, Service Animals and Guide Dogs

IO Employees will provide accessible customer service to people who are accompanied by a Support Person. Any person accompanied by a Support Person may freely enter IO’s corporate offices with their Support Person. At no time will a person accompanied by a Support Person be prevented from having access to that Support Person while on IO controlled premises.

IO will welcome people who are accompanied by a Service Animal/Guide Dog. Any person who is accompanied by a Service Animal/Guide Dog may freely enter IO’s corporate offices with their Service Animal/Guide Dog. At no time will a person accompanied by a Service Animal/Guide Dog be prevented from having access to that Service Animal/Guide Dog while on IO’s premises.

IO Employees will be properly trained on how to interact with people who are accompanied by a Service Animal/Guide Dog.

6.1.5. Meetings and Public Information Centres

When planning a meeting or event, IO's business units must consider accessibility in terms of physical access to the meeting space and access to the meeting contents and proceedings. Consideration will be given to the following:

- venue location (e.g. service by accessible transit);
- exterior access (e.g. signage, parking, paths of travel);
- interior access (e.g. entrances and lobbies, elevators, washrooms, hallways, meeting room); and
- refreshment and dietary requirements.

IO shall respond to all requests for accommodation in a timely manner. Due to the logistical constraints associated with the production of alternate format documents and the retention of American Sign Language (“ASL”) interpreters, IO reserves the right to establish request deadlines to guarantee provision of alternate document(s)/service(s).

When promoting the meeting (e.g. personal invite, public notice, advertisement in procurement documentation), IO will include information on the accessibility features of the meeting and will offer to arrange for additional accessibility features upon request (e.g. ASL interpretation, provision of meeting materials in alternate format). Information on how to make such a request will also be included.

All meeting materials (including invitations, meeting minutes, presentations) will be provided in an alternate format upon request.

6.1.6. Feedback Process

IO is determined to meet customer service delivery expectations, and comments on IO's services, including the level of accessibility experienced during service delivery, are welcomed and appreciated.

Feedback regarding the way IO provides goods and services to its customers shall be accessible, and can be made in person, in writing, by email or by telephone including TTY.

All feedback will be directed to IO Human Resources and to Business Services and Facilities departments for response and action, if required. If a method is not suitable, customers may request another method of communication.

The feedback can be provided:

- by mail addressed to: 1 Dundas Street West, 20th Floor, Toronto, ON M5G 2L5
- by phone to: (416) 327-3937
- in person at: 1 Dundas Street West, 20th Floor, Toronto, ON M5G 2L5
- by email to: hrcentral@infrastructureontario.ca

IO's customers' right to privacy will always be respected and all feedback will be reviewed for possible action that can be taken to improve IO services. However, IO cannot guarantee that the confidentiality of any information that is in the custody or control of IO will be preserved if a request for access to it is made under *FIPPA*. To the extent permitted under *FIPPA*, IO will inform customers of any request made of IO under *FIPPA* that may reveal information supplied in confidence by the customer to IO, so that the customer has an opportunity to make representations to IO with respect to the proposed disclosure.

Where possible, complaints and feedback requests will be addressed immediately. However, some complaints may require more effort to address and may require further review to determine the most appropriate course of action.

6.1.7. Notice of Temporary Service Disruption

Infrastructure Ontario shall provide customers with notice in the event of a planned or unexpected disruption in the services usually used by people with a Disability. The notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative services, if available.

The notice will be placed at conspicuous places on the affected premises, on the IO website, on outgoing telephone and TTY Machine messages and any other such method deemed reasonable under the circumstances.

This notice will be provided in accessible formats where possible.

6.1.8. Alternate Formats

In order to serve IO's customers, it may be necessary to provide information in an alternate format (i.e., other ways of publishing information beyond traditional printing). Examples of alternate format include but are not limited to: hard copy, large print, Braille, audio, electronic text, captioning, descriptive video service and sign language interpreters. When feasible, IO shall provide information in an alternate format, upon request. Such information may include but is not limited to:

- Reports
- Invoices
- Policy and Procedure documents
- Publications and Guides

If it is not feasible to convert the requested information into an alternate format, IO will make reasonable efforts to accommodate the requestor's needs in a manner that would make such information accessible (e.g., discuss the contents of a blueprint in person).

6.2 Procurement

IO will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. If it is not possible and practical to do so, IO will provide an explanation upon request.

6.3 Training

IO shall ensure that training is provided to (1) all Employees and volunteers, (2) all persons who participate in developing IO's policies, and (3) all other persons who provide goods, services or facilities on behalf of IO. New Employees will undertake training as part of their orientation as soon as practicable.

IO will require its Service Providers to undertake accessible customer training and may facilitate this training, where possible, by providing the necessary tools (e.g. information on training requirements, links to online e-learning courses, opportunities to take attend in-person sessions, etc).

Mandatory accessibility training includes:

- an overview of the AODA and the requirements of, the Integrated Accessibility Standards Regulation 191/11 and the Human Rights Code as it pertains to persons with Disabilities;
- information how to interact and communicate with persons with various types of Disabilities;
- information on how to interact with persons with Disabilities who use assistive devices or require the assistance of service animals, guide dogs, or support persons;
- information on how to use equipment or devices available on any premises, or otherwise, that may assist with the provision of goods or services to persons with Disabilities;
- information on what to do if a person with disability is having difficulty accessing IO goods and services; and
- this Policy and IO practices and procedures relating to the provision of goods or services to persons with Disabilities.

Employees must also be informed and/or trained as necessary if changes are made to this Policy and its related procedures and processes.

6.4 Employment

IO will notify Employees, potential hires and the public that accommodations can be made during recruitment and hiring.

IO will notify Employees that supports are available for people with Disabilities. IO will put in place a process to develop individual accommodation plans for Employees.

Where needed, IO will provide customized emergency information to help an Employee with a Disability during an emergency.

IO's performance management, career development and redeployment processes will take into account the accessibility needs of all Employees.

6.5 Providers of Goods and Services

IO must ensure that all new and renewed agreements with IO's Service Providers executed on or after March 31, 2014 contain a requirement for Service Providers to comply with the AODA, its regulations and respective accessibility policies as applicable to IO.

Copies of this Policy will be distributed to IO's Service Providers.

IO shall ensure that Service Providers provide annual attestation of completed accessibility training as per section 6.3 of this Policy.

6.6 Changes to Existing Policies and Procedures

IO will modify or remove existing policies, procedures and processes that do not comply with the AODA.

7 ROLES AND RESPONSIBILITIES

Chief Executive Officer

- ensure compliance with the legislation and regulations, as well as all orders issued by inspectors or directors appointed under the AODA
- oversee establishment of appropriate organization structures, systems, procedures, processes and controls, including regular staff training, to ensure compliance with this Policy
- take appropriate actions for any non-compliance with this Policy

Operations Committee

- ensure sufficient resources are available to comply with this Policy and to meet regulatory requirements

Executive Vice President, Corporate Services

- review and approve the Policy jointly with General Counsel
- review and approve substantive amendments to the Policy jointly with General Counsel
- establish appropriate organization structures, systems, practices, processes and controls to ensure compliance with the Policy
- ensure appropriate actions are taken with respect to reported non-compliance with the Policy

General Counsel

- review and approve the Policy jointly with the Executive Vice President, Corporate Services
- review and approve substantive amendments to the Policy jointly with the Executive Vice President, Corporate Services

Human Resources Department

- approve and certify corporate accessibility compliance reports required to be submitted to the Accessibility Directorate of Ontario, or any other regulatory body as appointed by the Government
- prepare guidelines, procedures and information sheets to implement this Policy
- develop multi-year accessibility plans, oversee their implementation, and provide regular progress updates
- monitor and track compliance with this Policy
- report any discovered non-compliance to CEO
- update and recommend amendments to this Policy as required by law

Business Unit Leads

- review and, as required, revise business unit policies, procedures, processes and best practices to ensure alignment and compliance with this Policy
- ensure that their Service Providers comply with the AODA requirements as applicable to IO
- ensure that their Service Providers complete applicable accessibility training
- ensure that their Employees undergo mandatory accessibility training

Employees

- read, understand and comply with this Policy
- undergo required accessibility training

8 REFERENCES

- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Accessibility Standards for Customer Service, Regulation 429/07*
- *Blind Persons' Rights Act*
- *Freedom of Information and Protection of Privacy Act*

- Integrated Accessibility Standards, Regulation 191/11
- *Ontarians with Disabilities Act, 2001*
- *Human Rights Code, R.S.O. 1990*
- *Workplace Safety and Insurance Act, 1997*

9 EFFECTIVE DATE

- January 1, 2010

10 EVALUATION DATE

- A minimum of every two (2) years after the effective date or as new or revised accessibility standards or requirements emerge

11 AMENDMENT DATE

- March 21, 2014
- April 1, 2015
- December 24, 2019
- January 28, 2020