



# ONTARIO TEACHERS' ACCESSIBILITY POLICY AND MULTI-YEAR PLAN

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Owner: Chief Pension Officer  
Chief People Officer

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## TABLE OF CONTENTS

<b>1. Purpose / applicability .....</b>	<b>3</b>
<b>2. Ontario Teachers' Accessibility Policy .....</b>	<b>3</b>
<b>2.1 Commitment to accessible information and communications .....</b>	<b>3</b>
<b>2.2 Accessible employment.....</b>	<b>6</b>
<b>2.3 Training commitment.....</b>	<b>7</b>
<b>3. Providing services to people with disabilities.....</b>	<b>9</b>
<b>3.1 Communication.....</b>	<b>9</b>
<b>3.2 Assistive devices .....</b>	<b>9</b>
<b>3.3 Billing .....</b>	<b>9</b>
<b>3.4 Service animals and support persons.....</b>	<b>10</b>
<b>3.5 Notice of temporary disruption.....</b>	<b>10</b>
<b>3.6 Modifications.....</b>	<b>10</b>
<b>4. Multi-year Accessibility Plan .....</b>	<b>11</b>
<b>5. Availability of this policy .....</b>	<b>15</b>
<b>6. Roles and responsibilities.....</b>	<b>15</b>
<b>7. Maintenance and review.....</b>	<b>16</b>
<b>Appendix A – Definitions.....</b>	<b>17</b>

## **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 policy, accessible customer service policy, multi-year accessibility plan and related commitments, 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.

## **2. This policy is applicable to all OTPP employees, Board Members, contractors, consultants, interns, volunteers and other individuals who provide services on behalf of OTPP in the Province of Ontario. OTPP's Accessibility Policy**

Through our core values, we champion accountability and risk consciousness, and respect diversity. 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.

### **2.1 Commitment to Accessible Information and Communications**

#### **(i) Accessible Formats and Communication Supports**

OTPP will endeavor to create, provide and receive information and communications in ways that are accessible to people with disabilities. OTPP will notify the public about the availability of accessible formats and communication supports.

Upon request, OTPP will provide:

(a) all organizational information and communications made available to OTPP's clients and the public, including this policy;

(b) any publicly available emergency procedures, plans or public safety information to its clients and the public; and

(c) access to any processes for receiving and responding to feedback, in an accessible format or via accessible communication support.

OTPP will provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs and, where applicable, at a cost that is no more than the regular cost charged to other persons.

OTPP will consult with the person making the request to determine the suitability of any accessible format or communication support provided. This information and documentation will be provided as soon as is practicable, but specific timeframes may vary depending on the format requested.

If the Company determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, OTPP shall, upon request, provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

(ii) **Website Accessibility**

Except where not practicable, the Company ensures that its current internet website(s), web content (backdated to 2012) and web-based applications conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA (other than success criteria 1.2.4 and 1.2.5).

(iii) **Feedback Regarding Accessibility**

OTPP encourages persons with disabilities to provide comments on the services they receive, including feedback regarding the accessibility of those services and OTPP's feedback process itself.

Feedback may be delivered to OTPP in person, by telephone, mail, email, facsimile or other means available to the person.

OTPP has two feedback channels available, specifically:

Feedback channels for Clients	Feedback channels for Employees and/or Job Applicants
<p>In person at OTPP’s office:</p> <p>5650 Yonge Street, 3<sup>rd</sup> Floor Toronto, ON, M2M 4H5</p> <p>Office Hours: Monday to Friday, 8:00am to 5:30pm</p>	<p>In person at OTPP’s office. Please note that we are in a hybrid working environment, so we ask if you contact us to schedule an in-person visit:</p> <p>5650 Yonge Street, 12<sup>th</sup> Floor Toronto, ON, M2M 4H5</p> <p>Office Hours: Monday to Friday, 9:00am to 5:00pm</p> <p>Contact Person: Elif Guzelgun, Manager, Employee Well-being</p>
<p>By telephone, facsimile or e-mail:</p> <p><b>Member Hotline / Phone</b> 416-226-2700 or 1-800-668-0105 (toll free)</p> <p><b>Fax</b> 416-730-7807 or 1-800-949-8208 (toll free)</p> <p><b>Email</b> inquiry@otpp.com</p>	<p>By telephone, facsimile or e-mail:</p> <p><b>Manager, Employee Well-being:</b> Phone: 437-928-4134</p> <p><b>People &amp; Culture (P&amp;C) Fax</b> 416-730-5346</p> <p><b>Email</b> BenefitsandWellbeing@otpp.com</p>
<p>By mail: in writing or through electronic or audio recording</p>	<p>By mail: in writing or through electronic or audio recording</p>

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. Persons providing feedback can expect an acknowledgment of their feedback to be issued within 10 days business days. The acknowledgment will indicate when the matter will be addressed, and when the individual will be notified further in the matter. Correspondence with the individual will take into account their accessibility needs and will be provided in accordance with OTPP’s commitment to accessible information

and communication supports, described above. OTPP will follow up with any required action within the timeframe noted in the acknowledgement.

## **2.2 Accessible Employment**

OTPP has implemented the following practices and procedures to promote the inclusion of applicants for employment and existing employees with disabilities in its workplace.

### **(i) Recruitment**

OTPP notifies employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process and when job applicants are individually selected to participate in an assessment or selection process.

If a selected applicant requests an accommodation, OTPP consults with the applicant and provides or arranges for the provision of a suitable accommodation (including with respect to any materials or processes used in the application process), taking into account the applicant's disability.

When making offers of employment, OTPP notifies successful applicants of its policies for accommodating employees with disabilities.

### **(ii) Employee Notification**

OTPP informs its employees of its policies used to support its employees with disabilities: (a) to new employees as soon as practicable after they begin their employment; and (b) whenever there is a change to existing policies on the provision of job accommodations that take into account accessibility needs due to a disability.

### **(iii) Accessible Formats and Communication Supports**

Where an employee with a disability requests it, OTPP will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace.

OTPP will consult with the employee making the request in determining the suitability of an accessible format or communication support.

(iv) **Individual Accommodation Plans**

OTPP has a written process for the development of a documented Individual Accommodation Plan. A copy of this written process is available in the [Accommodation & Return to Work Policy & Operating Procedures](#).

(v) **Return to Work Process**

OTPP has a return-to-work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. A copy of this policy is available in the [Accommodation & Return to Work Policy & Operating Procedures](#).

(vi) **Performance Management, Career Development and Advancement and Redeployment**

OTPP takes into account the accommodation needs of its employees, including any individual accommodation plans of employees, when: (a) using performance management; (b) providing career development and advancement opportunities; and (c) redeploying employees.

(vii) **Workplace Emergency Response Information**

OTPP provides individualized Workplace Emergency Response Information to employees who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.

If the employee who receives individual Workplace Emergency Response Information requires assistance, and with the employee's consent, OTPPP provides the workplace emergency information to the person designated by OTPPP to provide assistance to the employee. The information will be provided (a) as soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and (b) will be reviewed when the employee moves to a different location within the Ontario organization, when overall accommodation needs or plans are reviewed and when the employer reviews its general emergency response policies.

## **2.3 Training Commitment**

OTPP provides three types of training related to accessibility: accessible customer service training; integrated standards accessibility training; and training on the *Human Rights Code* as it relates to individuals with disabilities.

This training will be provided to all OTPPP employees, Board Members, contractors, consultants, interns, volunteers and other individuals who

provide services on behalf of OTPP in the Province of Ontario. This training will be provided to anyone who participates in developing OTPP's policies. The training will be provided by the Human Resources Department as soon as practicable and generally, within three months of the individual's commencement of duties. Training will also be provided 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.

(i) **Accessible Customer Service Training**

OTPP's accessible customer service training includes training on 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 guide or another 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
- How to use equipment or devices available on OTPP's premises or otherwise provided by OTPP that may help with the provision of our services to a person with a disability
- Any policies, practices and procedures that affect the way services are provided to people with disabilities by OTPP

(ii) **Integrated Standards Accessibility and Human Rights Code Training**

OTPP provides training on the requirements of *Integrated Accessibility Standards* and on the *Human Rights Code* as it pertains to persons with disabilities in a manner that is appropriate to the duties performed by the individual for OTPP.



### **3. Providing Services to People with Disabilities**

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 obtain and use our services and allowing them to benefit from the same services as other Clients. To the extent possible, OTPP will integrate its provision of services to persons with disabilities with those services provided to others, unless an alternate measure is necessary.

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:

#### **3.1 Communication**

OTPP will communicate with Clients with disabilities in a manner that takes into account any disabilities they may have.

We will train anyone who participates in developing OTPP's policies on how to interact and communicate with people with various types of disabilities.

#### **3.2 Assistive devices**

We are committed to allowing Clients with disabilities to 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 while on OTPP's premises, or if there are other barriers that prevent a person from accessing OTPP's services because of a disability, OTPP will work with that person find an alternative means for accessing the services up to the point of undue hardship. 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.

#### **3.3 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.

### **3.4 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 is able to obtain, use and benefit from OTPP's services.

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

OTPP is also 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.

OTPP may require a person with a disability to be accompanied by a support person when on its premises, but only if, after consulting with the person with a disability and considering the available evidence, OTPP determines that: (a) 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; and (b) there is no other reasonable way to protect the health and safety of the person with a disability and the health and safety of others on the premises.

### **3.5 Notice of temporary disruption**

OTPP will provide the public 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 OTPP's corporate website, or in a mailing. In the event of an unplanned disruption, advance notice may not be possible.

### **3.6 Modifications**

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 policy or other Client service policies before considering the impact on people with disabilities.

#### 4. Multi-Year Accessibility Plan

Under the AODA, private and not-for-profit organizations with 50 or more employees must create a multi-year accessibility plan. This Multi-Year Accessibility Plan outlines the policies and actions that OTPP will put in place between 2014 and 2021 to improve opportunities for people with disabilities across the organization.

This multi-year accessibility plan will be updated at least once every five years.

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
<b>General Requirements</b>		
Establish accessibility policies governing how OTPP will meet its obligations under the AODA	3.(1)	Complete - see further section 2 of this policy
Establish, implement and maintain a documented multi-year accessibility plan; post the plan on the website; review and update the plan at least once every five years	4.(1)	Complete - see further section 4 of this policy
Have regard to the accessibility for persons with disabilities when designing, procuring or acquiring self-service kiosks	6.(2)	Not currently applicable
Training on the requirements of the accessibility standards and on the Human Rights Code as it relates to persons with disabilities	7.(1)	Complete - see further section 2.2 of this policy
<b>Customer Service Standards</b>		
Develop, implement and maintain policies governing the provision of OTPP's services to persons with disabilities, and provide in an accessible format upon request	80.46 (1)	Complete - see further sections 3 and 2.1(i) of this policy
Training on accessible customer service	80.49 (1)	Complete - see further section 2.2 of this policy

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
<b>Information and Communications Standards</b>		
Ensure that feedback processes are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request	11.(1)	Complete - see further section 2.1(iii) of this policy
Upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, in consultation with the individual, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) at a cost that is no more than the regular cost charged to other persons. Notify the public of the availability of these supports	12.(1), (2) and (3)	Complete - see further section 2.1(i) of this policy
Provide any publicly available emergency response information in an accessible format, upon request	13. (1)	Complete - see further section 2.1(i) of this policy
Ensure new internet websites and web content on those sites conform with WCAG 2.0 Level	14. (4)1	Complete - see further section 2.1(ii) of this policy
By January 1, 2021, ensure all internet websites and web content conform with WCAG 2.0 Level AA, other than, i. success criteria 1.2.4 Captions (Live), and ii. success criteria 1.2.5 Audio Descriptions (Pre-recorded)	14. (4)2	In Complete
<b>Employment Standards</b>		
Notify OTPP employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes	22	Complete - see further section 0 of this policy

<b>Summary of the Accessibility Goal</b>	<b>Related Provision of the Regulations</b>	<b>Status</b>
During a recruitment process, notify job applicants when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used.	23	Complete - see further section 0 of this policy
Notify successful job applicant of OTPP's policies for accommodating employees with disabilities	24	Complete - see further section 0 of this policy
Inform employees of OTPP's policies used to support employees with disabilities	25	Complete - see further section 2.2(i) of this policy
Consult with a requesting employee in a manner that considers his or her disability to provide or arrange for the provision of accessible formats and communication supports for, (a) information that is needed in order to perform the employee's job; and (b) information that is generally available to employees in the workplace	26.1 and 26.2	Complete - see further section 2.2(ii) of this policy
Provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability	27	Complete - see further section 2.2(vi) of this policy
Develop and implement a written process for documenting individual accommodation plans for employees with disabilities.	28	Complete - see further section 2.2(iii) of this policy

<b>Summary of the Accessibility Goal</b>	<b>Related Provision of the Regulations</b>	<b>Status</b>
Develop and implement a return-to-work process employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work	29	Complete - see further section 2.2(iv) of this policy
Take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities	30	Complete - see further section 2.2(v) of this policy
Take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities	31	Complete - see further section 2.2(v) of this policy
Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities	32	Complete - see further section 2.2(v) of this policy
<b>Design of Public Spaces</b>		
Ensure that any new or redeveloped outdoor Paths of Travel (i.e. sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals) comply with the requirements of the AODA	80.22	Not currently applicable
Ensure that any new or redeveloped parking (on and off street) complies with the requirements of the AODA	80.32	Not currently applicable

Summary of the Accessibility Goal	Related Provision of the Regulations	Status
Ensure that any newly constructed service counters and fixed queuing lines, and any newly constructed or redeveloped waiting areas, comply with the requirements of the AODA	80.40	Not currently applicable
Develop procedures for preventative and emergency maintenance of the accessible elements in the above-noted public spaces and procedures for dealing with temporary disruptions when the above-noted accessible elements are not in working order	80.44	Not currently applicable

**5. Availability of this Policy**

A copy of this policy will be posted on OTPP’s corporate website and intranet site.

Upon request, OTPP will provide or arrange for the provision of this policy, or the information contained in this policy, to the requesting individual in an accessible format or with a communication support in a timely manner that takes into account the person’s accessibility needs due to disability and at no cost. In doing so, OTPP will consult with the person making the request in determining the suitability of the format or communication support.

**6. Roles and Responsibilities**

**Employees, Board Members, Contractors, Consultants, Interns, Volunteers and individuals who provide services on behalf of OTPP in the Province of Ontario:**

- Responsible for reviewing this policy and complying with its requirements
- Raise any accessibility concerns to their manager and/or Senior Manager, Plan Policy & Research
- Participate in and complete the AODA training

**Managing Director and Associate General Counsel**

- The Associate General Counsel, or delegate, is responsible for keeping the Policy Contacts updated about developments in the legal and

statutory environment that may impact OTPP's practices with respect to providing services to people with disabilities.

**Chief Pension Officer/Chief People Officer (Policy Owners/Policy Approvers)**

- Accountable for approving this policy and joint ownership of this policy.
- Responsible for filing the required compliance report with the Ministry of Community and Social Services.
- Responsible for analysis of feedback in accordance with the Feedback Process.

**Director, Quality & Risk Management & Manager (Policy Contacts)**

- Assigned by the Policy Owners to solicit key stakeholder feedback and to review and provide input into the policy prior to approval.
- 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.
- Act as a main contact for information and questions about implementation or interpretation of this policy.
- Will refer individuals to the most appropriate Ontario Teachers' employee (e.g. Manager, Well-being, Global Total Rewards, Talent Attraction, Facilities, etc.) for further assistance, if needed.

**7. Maintenance & Review**

This policy will be reviewed every three (3) 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.

**“Assistive Device”** means a piece of equipment a person with a disability uses to help them with daily living (e.g. a wheelchair, screen reader, hearing aid, cane or walker, an oxygen tank).

**“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*.

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

**“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 the individual in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

**“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.