



ONTARIO FINANCING AUTHORITY

ACCESSIBILITY POLICY

Last Modified/Reviewed: September 2019

Revision Date	Summary of Changes	Page Reference
Dec 2014	<p>3.2: Added notifying the public about the availability of accessible formats and communication supports.</p> <p>5.0 b: Added consulting with program areas and measuring the success of the Policy & Plan to HR Coordinators responsibilities.</p> <p>5.0 f: Added “from a legal perspective” to Legal’s responsibility to review Policy & Plan</p> <p>1 b: Added “Staff will be encouraged to apply best practices” to description of accessibility best practices for documents.</p> <p>1 d: Added section on accessibility for Email.</p> <p>4 d: Added removing barriers in job ads, and informing candidates selected for interview of accommodation.</p> <p>5: Deleted reference to 2014 commitments and added accessibility commitment into Senior Management performance plans.</p> <p>8. Added commitment to publicly post progress report.</p> <p>9 & 10: Changed Compliance Timelines chart into a future commitments section and a Progress Report section.</p>	<p>3</p> <p>5</p> <p>5</p> <p>6</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p>
April 2017	<p>2.0: References to the <u>Accessibility Standards for Customer Service (Ontario Regulation 429/07)</u> and the <u>Integrated Accessibility Standards Regulation (Ontario Regulation 413/12)</u> deleted and replaced with <u>Integrated Accessibility Standards (O.Reg. 191/11)</u>.</p> <p>3.2: Revised to indicate that a document describing the policy will be publicly available on the OFA web site.</p> <p>3.6: Revised to reflect current regulation.</p> <p>3.8 Added notifying public about availability of accessible formats and communication supports with respect to feedback process.</p> <p>5.0 a: “as appropriate to their duties” added to the third bullet point</p> <p>5.0 d: Name of position revised to Senior Manager.</p> <p>10: Progress Report updated.</p>	<p>3</p> <p>3</p> <p>4</p> <p>4</p> <p>5</p> <p>10-11</p>
Sept 2019	<p>5.0 d: Revised to reflect new Director, SCSD role and responsibilities</p> <p>5.0 g: Revised to remove Manager, Applications Development as Intranet sites compliance is not required</p> <p>Appendix A:</p> <p>1.0 a: Removed reference to intranet as it is only required that public facing content confirm to WCAG 2.0 level AA.</p> <p>9.0: Removed reference to intranet as noted above</p> <p>10: Progress Report updated to remove repetition.</p>	<p>2</p> <p>2</p> <p>6</p> <p>9</p> <p>10</p>

Accessibility Policy

1.0 PURPOSE

This policy describes the OFA's commitment to respect the dignity and independence of people with disabilities and outlines our multi-year plan to compliance with the [Accessibility for Ontarians With Disabilities Act](#) (AODA).

2.0 SCOPE

This policy, together with Appendix A: Multi-Year Plan 2013-2021, is a requirement under the AODA, that outlines the actions the OFA will put in place to improve opportunities for people with disabilities. The creation of this policy is in compliance with the [Integrated Accessibility Standards Regulation \(Ontario Regulation 191/11\)](#), which applies to Information and Communications, Employment, Transportation, Design of Public Spaces, and Customer Service. As the OFA does not provide Transportation, or Design of Public Spaces, these two categories are not addressed in this policy. Because the OFA's mandate under the *Capital Investment Plan Act, 1993* is to provide services to the Province and other public bodies, its interaction with the public is limited. Nevertheless, it is committed to accessibility for persons with disabilities in performing all of its functions.

3.0 POLICY RULES

3.1 Statement of Commitment

The OFA is committed to excellence, including how it interacts with people with disabilities. We are committed to providing barrier-free recruitment and employment, and communicating by providing information in an accessible manner using resources that have been developed in consultation with people with disabilities.

3.2 Information and Communications

This Policy will be publicly available on the OFA's website. The OFA will notify the public about the availability of accessible formats and communication supports and communicating directly with people with disabilities in ways that take into account their disability. Upon request, we will provide information to the public, including public safety information about our office, in accessible formats or with communication supports. We will meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0, Level AA website requirements in accordance with timelines set out in the Integrated Accessibility Standards Regulation.

3.3 OFA Premises

We welcome assistive devices, service animals and support persons used by people with disabilities onto OFA Premises.

3.4 Procurement

We will incorporate accessibility criteria and features when procuring, or acquiring goods, services or facilities, including self-serve kiosks. If it is not practicable to do so, we will provide an explanation upon request.

3.5 Employment

We will notify employees, potential hires and the public that accommodations can be made during recruitment and employment. A process is in place to develop individual accommodation plans for employees as required. Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. Our performance management, career development and organizational processes will take into account the accessibility needs of all employees.

3.6 Training

We are committed to training staff, contractors, persons who participate in developing the organization's policies, and others who provide goods, services or facilities on our behalf on:

- accessible customer service
- requirements of the accessibility standards as appropriate to their duties
- aspects of the Human Rights Code as it pertains to persons with disabilities as appropriate to their duties

3.7 Notice of Service Disruption

We will notify employees and other individuals who may be affected if there is a disruption at our office affecting any OFA services used by people with disabilities. We will explain the reason for the disruption, how long it will last, and if alternative facilities or services are available. We may not be able to give advance notice if it is an emergency disruption.

3.8 Feedback

We welcome feedback about our services provided to clients, employees and potential employees with disabilities. We will work with any individual to make accessible formats and communications supports available with respect to the feedback process.

4.0 MODIFICATIONS TO THIS OR OTHER POLICIES

This Policy will be reviewed on an annual basis. The OFA is committed to respecting the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy, or any OFA policy, before considering the impact on people with disabilities. The OFA will review any OFA policy if it is brought to its attention that the policy does not respect the dignity and independence of people with disabilities. All staff are encouraged to review OFA policies for this purpose. If any OFA policy is determined to not respect the dignity and independence of people with disabilities it will be modified or removed.

5.0 ROLES AND RESPONSIBILITIES

- a) OFA staff, employees, contractors and temporary help are responsible for:
- complying with the OFA Accessibility Policy and Multi-Year Plan
 - providing accessible customer service, information, and communication
 - completing accessibility training as appropriate to their duties
 - identifying their accommodation needs, where applicable, to the relevant manager/supervisor or OFA HR Coordinator
 - where applicable, working with OFA management, staff and HR Coordinator to develop accommodation plans that meet their needs and that are practicable for the OFA to implement
- b) The OFA HR Coordinator is responsible for:
- disseminating the OFA Accessibility Policy and Multi-Year Plan and conducting an annual review of these documents in consultation with program areas as required
 - completing the online Accessibility Compliance Reporting (ACR), as required by the Accessibility Directorate of Ontario
 - facilitating the development of accommodation plans
 - monitoring the progress of the OFA Accessibility Policy and Multi-Year Plan
- c) OFA Management is responsible for:
- identifying accessibility training relevant to the responsibilities of their employees
 - working with employees and OFA HR Coordinator to develop accommodation plans that meet the needs of employees, potential employees, contractors and temporary help, except where it is not practicable to do so
 - incorporating accessibility criteria and features in procurement practices
- d) OFA Director, Strategic Corporate Services Division is responsible for:
- certifying the online accessibility compliance reporting
- e) OFA Chief Executive Officer's Office is responsible for:
- providing executive oversight on compliance with the OFA Accessibility Policy and Multi-Year Plan, the IASR and the AODA
- f) OFA Legal Division is responsible for:
- advising on the OFA's obligations under the AODA, including any applicable regulations
 - reviewing the OFA Accessibility Policy and Multi-Year Plan and advising on related legal matters
- g) OFA Senior Web Coordinator is responsible for:
- ensuring WCAG 2.0 level AA compliance on all external websites as per timelines in Section of the Multi-Year Plan
 - keeping abreast of new developments in accessibility for online content and implementing new technologies as they become available and are assessed to be beneficial

APPENDIX A: Multi-Year Plan 2013 - 2021

1. Information and Communication

The OFA will implement the following steps in accordance with the OFA Accessibility Policy.

- a) **Internet.** Except where not practicable, the OFA will ensure all public-facing websites created after January 1, 2012, and all content including forms and documents on those websites, will conform to WCAG 2.0 Level AA. All Internet websites, and all content will conform by January 1, 2021. The foregoing requirements *exclude* live captioning and pre-recorded audio description. OFA systems staff will keep abreast of new developments in accessibility for online content and will implement new technologies as they become available and assessed to be beneficial. As per subsection 14(6)(a) of the Regulation, in determining whether the requirements in Appendix A, section 1(a) of this Policy are “practicable”, it is necessary to consider, among other things, the availability of commercial software or tools or both.
- b) **Documents.** The OFA will ensure that all newly created documents, paper or electronic in any format created after January 1, 2012, that may be provided to the public, including responses to any future request under the Freedom of Information and Protection of Privacy Act (“FIPPA”), conform to accessibility standards. Staff will be encouraged to apply best practices such as creating digital documents that are readable by screen readers (i.e. created using Microsoft Word Styles) and paper documents in an easily legible font/font size for those with low vision.
- c) **Telephone.** The OFA will accept Text Telephone (“TTY”) telephone calls from members of the public and other third parties using Telephone Relay Services (“TRS”) or equivalent services. A TTY is a device used by people with hearing disabilities. Confidential government information and information protected by FIPPA should not be communicated through relay services but may be communicated internally using TTY devices, where communications by email or in person would otherwise be inappropriate. This is currently effective.
- d) **Email.** OFA Staff are encouraged to make email communications more accessible by avoiding the use of PDF attachments when possible and instead including content in the body of the email or a link to the HTML version.

2. OFA Premises

The OFA is committed to allowing clients, employees and third parties who may access our premises (temporary help, contractors, colleagues from the financial communities, etc.) to do so in a manner that takes into account any disability they may have..

- a) **Assistive Devices.** The OFA will ensure that staff who deal with third parties are familiar with various assistive devices and allow people to use their personal assistive devices to access our services. Assistive devices may include, but are not limited to wheelchairs,

walkers, white canes, oxygen tanks, portable chalk boards, screen reading software, and electronic communication devices.

- b) **Service animals and support persons.** The OFA is committed to welcoming people with disabilities who are accompanied by a service animal or support person when accessing the OFA premises. At no time will a person with a disability who is accompanied by a support person or service animal be prevented from having access to their support person or service animal while on the OFA premises.

3. Procurement

In accordance with its procurement policy, the OFA will incorporate accessibility criteria and features as required when procuring or acquiring goods, services or facilities, except where it is not practicable to do so. Where it is determined to not be practicable, the OFA will be prepared to provide a written explanation.

- a) **Requests for Bids** and other related procurements such as Requests for Services, will require vendors to demonstrate that they are inclusive and accessible as an employer and as a provider of goods and/or services.
- b) The OFA will incorporate accessibility features when procuring or acquiring **Self-Service Kiosks**. Accessibility features may be technical, structural, and/or the access path to the kiosk. For the purposes of this section, a self-service kiosk is “an interactive electronic terminal, including a point-sale device, intended for public use that allows users to access one or more services or products or both.”

4. Employment

The OFA will assess and eliminate barriers in recruiting new employees and in managing existing employees.

- a) **Recruitment.** The OFA will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. The OFA will include language in job ads and other recruitment methods notifying potential candidates that we will provide accommodations for disabilities in accordance with legislative standards, on request, to support candidates' participation in all aspects of the recruitment process. Further, we will remove barriers in the job ads, such as jargon and complex language. Applicants who have been chosen for the selection process will be informed that the OFA will provide accommodations for disabilities during the process. If accommodation is required it will be developed in consultation with the candidate who made the request. All successful applicants will be notified of the OFA's policies for accommodating employees with disabilities when offering employment.
- b) **Emergency Response Information.** OFA Managers will consult with their direct reports to identify individuals who require assistance in the event of an emergency, whether permanently or temporarily, and to make an individual emergency response plan that takes into account their disability. This may include providing emergency response information in accessible formats.

- c) **Supporting Employees.** The OFA will take into account the accessibility needs of employees with disabilities. Managers, Business Services staff, and other parties such as external vendors will, as needed, plan accommodations in consultation with employees who require them. The OFA will ensure such accommodations are in accordance with the following requirements of the Integrated Accessibility Regulation (sections 28-32):
- Documented individual accommodation plans
 - Return to work process
 - Performance management
 - Career development
 - Redeployment
- d) **Informing Employees.** The OFA will inform all employees of this commitment by requiring reading of the Accessibility Policy and Multi-Year Plan, as well as via staff meetings and manager-employee meetings. OFA Management understands that disabilities may be temporary or permanent and may develop at any time during a period of employment.

5. Training for Employees

The OFA will provide training to all staff as described below. Where applicable, training will be via OPS Learning & Development sessions that have been developed in consultation with people with disabilities. All new staff will finish training within six months of hire. Additional training may be required with developments such as in technology or new Regulations. There must be a record of each training opportunity an employee completes. In addition, senior managers are encouraged to have a commitment to accessibility in their individual performance plans.

- a) **Integrated Accessibility Standards Regulation.** All staff will be trained on the requirements of the Integrated Accessibility Standards Regulation and on the Human Rights Code as it pertains to persons with disabilities. All staff will complete training on accessibility specific to the duties of their position, such as Information Technology staff training on accessible website development and Managers training on managing employees with disabilities.
- b) **Accessibility Standards for Customer Service.** Staff who deal with the public or other third parties on behalf of the OFA, and all staff who are involved in the development and approvals of policies, practices and procedures on the provision of goods or services to the public or other third parties, will take Customer Service training. This training will be provided to staff entering such positions within three months of commencement of duties.

6. Notice of Temporary Disruption

- a) **External.** The OFA will provide notice on its external website and/or over the telephone in the event of a planned or unexpected disruption in its services used by people with disabilities.
- b) **Internal.** The OFA will provide notice on its internal Portal site and/or over email and/or over phone in the event of a planned or unexpected disruption of supports for employees with disabilities.

Notices will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. This is currently effective.

7. Feedback Process

- a) **External.** Comments regarding how well our service standards for clients, candidates for employment, and third parties with disabilities are being met are welcome and appreciated. Feedback can be made by e-mail or verbally on the telephone. A general email address and phone number are available on our website. All emails and phone messages regarding accessibility will be forwarded to the attention of the OFA HR Coordinator.
- b) **Internal.** Comments regarding how well we are supporting our employees with disabilities are welcomed and appreciated. Feedback can be made directly to the OFA HR Coordinator by phone or email or anonymously through the Electronic Suggestion Box on the OFA Portal.

Individuals who submit feedback can expect to hear back within two week's time. The OFA will take all reasonable measures to rectify the situation regarding any complaint received. The OFA will consult with persons with disabilities through the review and consideration of all feedback received.

8. Annual Status Review

The OFA will measure the success of this Multi-Year Plan by checking its progress every 12 months. This will provide a view of what has been accomplished and what still needs to be done. The progress report will be posted publicly as part of the OFA's Multi-Year Plan.

9. Future Commitments

By January 1, 2021, all external websites and web content created after January 1, 2012, will conform to WCAG 2.0 level AA. Content published prior to 2012 will be made available in an accessible format upon request.

10. Progress Report Chart (cumulative as of first date implemented)

As of January 1, 2014	As of January 1, 2015	As of January 1, 2016	As of January 1, 2017	As of January 1, 2018	As of January 1, 2019	As of January 1, 2020	As of January 1, 2021
General Requirements <ul style="list-style-type: none"> • Accessibility Policy & Multi Year Plan 	General Requirements <ul style="list-style-type: none"> • OFA Accessibility Policy & Plan reviewed and updated. 	General Requirements <ul style="list-style-type: none"> • Filed an Accessibility Compliance Report in December 2015 		General Requirements <ul style="list-style-type: none"> • Filed an Accessibility Compliance Report in December 2017 		General Requirements <ul style="list-style-type: none"> • To-do: File an Accessibility Compliance Report in December 2019 	
Information & Communications <ul style="list-style-type: none"> • Accessible feedback processes in place • Will accept TTY phone calls • New public-facing websites conform to WCAG 2.0 Level AA 	Information & Communications <ul style="list-style-type: none"> • All documents, paper or electronic in any format, that may be provided to the public, including responses to any future request under the FIPPA, will conform to accessibility standards, as set out by the IASR 						Information & Communications <ul style="list-style-type: none"> • To-do: All external websites and web content conform to WCAG 2.0 Level AA.

<p>Procurement</p> <ul style="list-style-type: none"> • Accessibility integrated into all Requests for Bids and other related procurements 							
<p>Employment</p> <ul style="list-style-type: none"> • Emergency Response Information • Workplace Violence Risk Assessment • Accessible Recruitment • Supporting Employees • Training on Accessibility – Customer Service, general Ontario Human Rights Code, IASR & AODA • Informing Employees 	<p>Employment</p> <ul style="list-style-type: none"> • Training on Accessibility – general Information and Communications, job-specific, Employment Standards for Managers 				<p>Employment</p> <ul style="list-style-type: none"> • OFA HR manages the development, support and records of accommodation plans 		
			<p>Training</p> <ul style="list-style-type: none"> • Email communication released in August 2016 to Managers and Staff on the 4 accessibility 			<p>Email communication released in to Managers and Staff on the 4 accessibility courses available on LearnOn.</p>	

			<p>courses on LearnOn.</p> <ul style="list-style-type: none">• Email communication released in August 2016 to Managers and/or HR Professionals only on the 2 training courses.				
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