

#### **ACCESSIBILITY POLICY**

# 1.0 Purpose

This policy outlines OICR's commitment to an accessible work environment including adherence to key requirements under the *Accessibility for Ontarians with Disabilities Act* (AODA), including its regulations and standards.

# 2.0 Scope

This policy applies to all Employees and any individual who provides goods, services, or facilities to other third parties on behalf of OICR.

## 3.0 Definitions

**Accessible Formats:** May include, but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with Disabilities.

**Assistive Device:** Any device designed to assist a person with a Disability, e.g., canes, wheelchairs, hearing aids, speech assistive devices, etc.

**Communication Supports:** May include, but are not limited to, captioning, alternative and augmentative Communication Supports, plain language, sign language and other supports that facilitate effective communications.

**Customer:** An individual who receives goods or services from the organization, irrespective of whether payment was received for such goods or services. Customers can include third parties, consultants, vendors, interview candidates, meeting or conference attendees, representatives of other businesses and professional services, visitors and the general public.

**Disability:** Disability refers to all Disabilities protected in the Human Rights Code, R.S.O. 1990, c.H.19 as defined in Section 10 of the Code as follows:

- "(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, including diabetes mellitus, epilepsy, and 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 on a wheelchair or other remedial appliance or device,
- (b) a condition of mental retardation or impairment,
- (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 Workplace Safety and Insurance Act."

**Employee**: an individual who has signed an employment contract and performs work for OICR for wages.

**Service Animal:** As defined under Section 80.45(4) of the Integrated Accessibility Standards Regulation, O. Reg. 191/11, an animal is a service animal for a person with a Disability if it is readily apparent that the animal is used by the person for reasons relating to his or her Disability, or if the person provides a letter from a regulated health professionals listed under section 80.45(4)(b) of the Regulation.

**Support Person:** As defined under Section 80.45(3) of the Integrated Accessibility Standards Regulation, O. Reg. 191/11 a 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, services or facilities.

### 4.0 Policy

OICR is committed to providing a respectful, accessible, and inclusive environment in the provision of services, goods and facilities to Employees and visitors. OICR is obligated under the *Accessibility for Ontarians with Disabilities Act* (AODA) and its regulations to comply with all applicable legislation governing accessibility standards, including requirements related to: (1) information and communications, (2) employment, and (3) Customer service.

## 4.1 Establishment of Accessibility Policy and Plan

OICR will ensure it has a policy and multi-year accessibility plan in place. The plan is posted on OICR's external website and made available in Accessible Formats upon request. The accessibility plan will be reviewed and updated at least once every five (5) years.

### 4.2 Roles and responsibilities

#### **Human Resources**

- Ensure compliance with the AODA, including the Employment Standards, and respond to related requests; and
- Ensure accessibility considerations are fully incorporated into OICR's policy on Return to Work.

### Manager, Health, Safety and Wellness

- Serve as lead for Accessibility portfolio including:
  - develop and maintain this policy as well as OICR's multi-year accessibility plan, including coordinating input from other stakeholders as required;

- act as the point of contact, and submit compliance reports to the Ministry for Seniors and Accessibility;
- provide AODA training as required; and
- o respond to general accessibility requests, including support to accessibility requests received by Human Resources and Communications, as needed.

#### **Communications**

 Ensure compliance with the AODA Information and Communication Standards and respond to related requests, including requests sent to <a href="mailto:info@oicr.on.ca">info@oicr.on.ca</a>.
 (Refer to Section 4.3.3 Feedback Procedure).

# **Supervisors and Managers**

- Ensure that they and their Employees are familiar with and comply with this policy; and
- Monitor current practices to ensure compliance.

# **Vice-President Corporate Services and Chief Financial Officer**

- Executive-level responsibility for Accessibility including:
  - Approval of OICR's Accessibility Plan; and
  - Signing authority for AODA compliance reports.

## 4.3 Communication Supports - General

OICR is committed to serving persons with a Disability who use Assistive Devices, Service Animals, and Support Persons to obtain, use or benefit from our goods and services. At no time will a person with a Disability who is accompanied by a Support Person be prevented from having access to their Support Person while in OICR facilities.

OICR will provide or make arrangements to provide Accessible Formats and Communication Supports for persons with Disabilities upon request, and in consultation with the person making the request. Accessible Formats and Communication Supports will be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged.

Upon the request of an Employee with a Disability, OICR shall consult with the Employee to provide/arrange for the provision of Accessible Formats and Communication Supports for information that is:

- needed to perform the Employee's job; and
- generally available to Employees in the workplace.

This does not apply to products and product labels, unconvertible information or communications and information that OICR does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the department will provide the person requesting the information or communication with an explanation as to why

the information or communications are unconvertible and a summary of the unconvertible information or communications.

#### 4.3.1 Accessible Websites and Web Content

OICR internet websites and web content shall conform with World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level AA to the extent required.

# 4.3.2 Temporary Disruptions, Emergency Procedures, Plans & Information

OICR shall provide all existing public emergency procedures, plans and public safety information, upon request, in an Accessible Format or with appropriate Communication Supports in a timely manner.

If necessary, OICR will provide Customers with notice in the event of a planned or unexpected disruption in facilities or services usually used or required by persons with Disabilities. OICR will work with its landlord (MaRS) to ensure notice is provided as soon as possible and will include information about the reason for the disruption, its anticipated duration and a description of alternative measures.

#### 4.3.3 Feedback Procedure

The Director, Communications will be the primary contact for feedback regarding the way OICR provides goods and services to persons with Disabilities.

(1) Feedback can be made via by email, phone, and in writing to:

Christopher Needles, Director, Communications Ontario Institute for Cancer Research MaRS Centre 661 University Avenue, Suite 510 Toronto Ontario Canada M5G 0A3

Telephone: 416-977-7599

Toll-free number: 1-866-678-6427

Email: info@oicr.on.ca

(2) Feedback will be sent to the Director, Communications who will assess and direct the feedback (if required) to the appropriate Employee/team.

- (3) OICR will aim to acknowledge and respond as soon as practicable.
- **(4)** A copy of this policy will be given to any person upon request.

# 4.4 Employment

OICR will take into account a person's Disability during the hiring process and for the duration of their employment.

#### 4.4.1 Recruitment

OICR shall post information about the availability of accommodation for applicants with Disabilities in its recruitment process. Job applicants who are selected for an interview shall be notified that accommodations are available for materials/processes used in selection, upon request. OICR will consult with any applicant who requests an accommodation in a manner that takes into account the applicant's Disability. Successful applicants shall be notified about OICR's policies for accommodating Employees with Disabilities.

# 4.4.2 Employee Supports

OICR shall inform Employees of its policies used to support Employees with Disabilities, including on the provision of job accommodations that take into account an Employee's accessibility needs due to Disability. OICR shall provide this information to new Employees as soon as practicable after they begin their employment and provide updated information to Employees whenever there is a change to existing policies on the provision of job accommodations.

## 4.4.3 Workplace Emergency Response Information

If OICR is aware of the need for an accommodation and an Employee's Disability is such that workplace emergency response information is necessary, this information will be provided to the Employee. In addition, this information will be provided, with the Employee's consent, to the person designated to provide assistance. The information will undergo review when the Employee moves to a different location, when the Employee's overall accommodation needs or plans are reviewed, and when Health and Safety reviews its general emergency response plan.

#### 4.4.4 Return to Work Process and Accommodations Plans

Human Resources will work with Health Services to have in place a documented return to work process for Employees returning to work due to Disability and requiring Disability-related accommodations. This return-to-work process will outline the steps that OICR will take to facilitate the return to work (refer to OICR's policy on Return to Work). The process will also be used to develop accommodation plans for Employees with Disabilities.

If requested, these plans will include information regarding Accessible Formats and Communication Supports. If requested, the plans will include individualized workplace emergency response information.

# 4.4.5 Performance Management, Career Development & Redeployment

OICR will take into account the accessibility needs of its Employees with Disabilities as well as any individual accommodation plans when providing career development, performance management, and when considering redeployment.

# 4.5 Training

All Employees are required to take training that reviews the requirements of the accessibility standards, where applicable to OICR, and as referred to in the AODA Integrated Accessibility Standards (Ontario Regulation 191/11) and on the Human Rights Code as it pertains to persons with Disabilities.

All Employees or other persons who provide goods or services on behalf of OICR, and all persons who participate in developing policies on behalf of OICR must receive training appropriate to their job function to ensure that AODA requirements are met. Training shall include:

- A review of the purposes of the AODA and the requirements of the Accessibility Standards under the Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) and instruction about the following matters:
  - how to interact and communicate with persons with various types of Disabilities;
  - how to interact with persons with Disabilities who use an Assistive Device or require the assistance of a guide dog or other Service Animal or the assistance of a Support Person;
  - how to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a Disability; and
  - what to do if a person with a particular type of Disability is having difficulty accessing the provider's goods or services.

The training provided will be appropriate to the duties of the Employee. Training will take place as soon as is practicable and, upon completion, OICR will keep a record of the training provided including the dates when the training took place.

Employees will also be trained and/or notified when material changes are made to this policy.

## 4.6 Procurement of Goods, Services, Facilities and Kiosks

When procuring goods, services, self-service kiosks or facilities, OICR will incorporate accessibility criteria and features, unless it is not practicable. If not practicable, OICR will provide an explanation, upon request.

## 4.7 Feedback

OICR is committed to ensuring that any process for receiving and responding to feedback is accessible to persons with Disabilities by providing or arranging for the provision of Accessible Formats and Communication Supports in a timely manner, taking into account, the person's accessibility needs. The public shall be notified about the availability of Accessible Formats and Communication Supports.

#### 5.0 Related Documents

OICR Multi-Year Accessibility Plan

Return to Work Workplace Harassment and Discrimination Policy Code of Conduct

## 6.0 References

Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11

Human Rights Code, R.S.O. 1990, c. H.19

Ontario Regulation 191/11: Integrated Accessibility Standards

# 7.0 Revision History

Document Number	Modified Date (YYYY-MM-DD)	Level of Change	Revision Comments	
AD-HR.630.001	Not Applicable	Not Applicable	<ul> <li>This is a new, comprehensive accessibility policy that also replaces OICR's Accessible Customer Service Policy.</li> <li>Reviewed by Hicks Morley External Legal Counsel (June 26, 2021)</li> </ul>	

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