

ACCESSIBILITY POLICY

Management Policy



Approved effective:
October 13, 2020

Next Review Date:
October 2021

General

Purpose and Scope

The purpose of the Accessibility Policy (the “Policy”) is to set out OPTrust’s vision and goals for developing and implementing its accessibility policies in accordance with its obligation under the *Accessibility for Ontarians with Disabilities Act, 2005* (Ontario) and the regulations thereunder including the Integrated Accessibility Standards, as updated from time to time (collectively, “AODA”). The Policy outlines OPTrust’s accessibility standards for information, communication and employment in accordance with the AODA.

Statement of Organizational Commitment

As an organization, OPTrust is committed to meeting the accessibility needs of persons with disabilities in a timely manner in accordance with the requirements of AODA.

Guiding Principles

OPTrust’s approach to accessibility is rooted in the belief that all persons are entitled to dignity, independence, inclusion, integration, and equality of opportunity. OPTrust is committed to providing services in a way that respects the dignity and independence of persons with disabilities and ensures that all

employees (including contract and temporary employees), candidates for employment, and members of OPTrust receive equitable treatment without discrimination and with accommodation, where required.

Legal Framework

OPTrust is subject to and required under the AODA to:

- establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization’s strategy to prevent and remove barriers and meet its statutory requirements;
- post the accessibility plan on its website and provide the plan in an accessible format upon request; and
- review and update the accessibility plan at least once every five years.

The AODA does not replace or affect existing legal obligations under the Human Rights Code (Ontario) and other laws governing accommodation of people with disabilities. The Human Rights Code (Ontario) provides individuals with a forum to make discrimination complaints against employers. The AODA applies to all organizations in Ontario and increases accessibility for all people in the province.

Related Policies

The Policy is to be read in conjunction with the Accessibility Standards for Customer Service which can be accessed on the OPTrust internet website and the internal Intranet site.

Guidelines and Procedures

Guidelines supporting this policy as well as the multi-year accessibility plan, both of which provide more details of the application of the Policy to OPTrust, are available on the Intranet.

Risk Management

The Board of Trustees (the “Board”) has established the Risk Appetite Statement which defines OPTrust’s approach to risk and identifies the key risks facing OPTrust. The Policy also helps manage the organization’s governance, operational, legal and regulatory and reputational risk by ensuring that we are providing services in a manner that respects the dignity of all persons who come into contact with our organization.

Accountabilities and Reporting

The President & Chief Executive Officer (the “CEO”) is accountable to the Board for OPTrust’s compliance with the AODA pursuant to the general grant of authority under the Board Governance Mandate and Delegation to the CEO (the “CEO Delegation”). The CEO provides an attestation of compliance to the Board as part of his annual organization-wide attestation.

The CEO hereby delegates to the Senior Vice-President, People, Communications & Public Affairs (“SVP People”) responsibility for ensuring that OPTrust complies with AODA, including attesting to compliance with AODA as part of the organization-wide attestation process.

Compliance Standards

OPTrust strives at all times to provide services in a way that respects the dignity and independence of people with disabilities, by ensuring all people with disabilities receive

accessible services with the same quality and timeliness as others do.

General Accessibility Standards

Training

OPTrust will ensure that training is provided to all employees, volunteers and all persons who participate in the development of the Policy and the related procedures (the Policy and any related procedures required under the AODA collectively referred to as the “AODA Policies”). Training will be provided on:

- the requirements of the Integrated Accessibility Standards;
- the Human Rights Code (Ontario) as it pertains to persons with disabilities; and
- the AODA policies required by the Integrated Accessibility Standards.

OPTrust keeps a record of the training provided, including the dates and participants.

Information and Communication Standards

Feedback

OPTrust will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. 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. 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. OPTrust will notify employees, candidates for employment and the public that accessible formats and

communications supports are available in respect of its feedback procedures.

Accessible Formats and Communication Supports Available Upon Request

All organizational information is made available to OPTrust members and the public in an accessible format or via accessible communication support upon request. OPTrust will consult with the person making the request to determine the suitability of an accessible format or communication support provided. Timeframes for this information will be dependent upon the format requested but in all cases the information will be provided as soon as is practicable and at no greater cost than that charged to persons not requesting the information in that format. OPTrust notifies its members and the public about the availability of accessible formats and communication supports through its website as well as its communication materials.

Multi-Year Accessibility Plan

OPTrust has published a multi-year accessibility plan to improve the accessibility of its goods, services and facilities in compliance requirements of the AODA. The accessibility plan is posted on its website and Intranet and will be provided in an accessible format upon request. OPTrust will review and update the accessibility plan at least once every five years.

Accessible Websites and Web Content

OPTrust's websites and web content conform with WCAG 2.0, Level A for web content. By January 1, 2021, all website content will conform with WCAG 2.0, Level AA. OPTrust continues work towards increasing the accessibility of its existing web content, website and web-based applications.

Accessible Emergency Information

OPTrust will provide emergency response information and assistance to its members and the public in an accessible format or with appropriate communication supports as soon as practicable upon request.

Customer (Member) Service Standards

This section applies to all members of OPTrust, including employees of OPTrust in their capacity as members of the OPSEU Pension Plan.

Further information on these principles can also be found in OPTrust's Accessible Customer Service Policy and Accessible Customer Service Policy and Accessibility Guideline, which are posted on the OPTrust website.

Assistive Devices

OPTrust is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. Members with disabilities may use their personal assistive devices when accessing OPTrust facilities and services and, in cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access OPTrust's facilities and services. OPTrust will ensure that staff knows how to use assistive devices available on the premises for members, and informs members of the assistive devices that are available.

Use of Service Animals and Support People

People with disabilities may bring their service animal on to parts of our premises that are open to the public or other third parties.

OPTrust will ensure that all staff are trained on how to interact with people with disabilities who are accompanied by a service animal.

Any person with a disability who is accompanied by a support person will be allowed to enter OPTrust's premises that are open to the public or other third parties with their support person. 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 on our premises. OPTrust will ensure that all staff are training on how to interact with people with disabilities who are accompanied by a support person. When support people are required for OPTrust-sponsored meetings, consultations or events (e.g., sign language interpreters, real-time captioners, attendants), OPTrust will arrange to pay support people directly for their time and reasonable travel expenses upon request, in accordance with OPTrust's travel and expense guidelines.

On rare occasions, a manager may determine that a support person is required for a person with a disability, or that a service animal cannot enter an area of the premises due to the application of another law. In these instances, managers will suggest, following consultation with the persons with a disability in order to determine their needs, appropriate alternatives and provide assistance.

Communication Needs

OPTrust is committed to meeting the communication needs of people with disabilities and will work with an individual to provide information in an accessible format and with suitable communication supports, as and where necessary. OPTrust trains all staff on how to interact and communicate with people with various types of disabilities.

Notice of Temporary Disruptions

OPTrust will provide members with notice in the event of a planned or unexpected

disruption in the facilities or services used by people with disabilities. This notice will include information about the reason for the disruption, how long the disruption is expected to last, and a description of any alternative facilities or services available (if any). The notice will be placed at all public entrances on OPTrust's premises. Depending on the nature of the disruption, notice will also be provided on outgoing telephone messages and on OPTrust's public website. This notice will be provided in accessible formats.

Employment Standards

This section applies to all employees and candidates for employment within OPTrust.

Recruitment, Assessment and Selection

OPTrust is committed to fair and accessible employment practices. Accommodations are available on request for candidates taking part in all aspects of the recruitment, assessment and selection process.

OPTrust will notify the public and employees of the availability of accommodation for job applicants during the recruitment process. Internal and external applicants who have been selected to participate in an interview or selection test will be notified that accommodation is available upon request if the applicant requires accommodation due to a disability. OPTrust will consult with applicants to determine how to best meet their needs.

Successful candidates will be notified of our policies for accommodating employees with disabilities when the offer of employment is made.

Informing Employees of Support and Creation of Individual Accommodation Plans

Employees at OPTrust will be advised of OPTrust's policy for supporting employees

with disabilities, including providing employment-related accommodations and emergency response plans for staff with disabilities. Employees with disabilities will have an accessible individual accommodation plan developed by the People team in consultation with the employee. The plan will include considerations for performance management, career development and redeployment.

Accessible Formats and Communication Supports

Where an employee with a disability requests it, OPTrust will consult with the employee and provide or arrange for the provision of accessible formats and communication support for information that is needed to perform the employee's job, or for information that is generally available to employees in the workplace.

Workplace Emergency Response

OPTrust shall 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. This includes, where required, the creation of individualized emergency response plans which are accessible so employees with disabilities can understand them. With the employee's consent, OPTrust will assign designated response persons to provide the necessary support during an evacuation, providing the employee with a copy of the plan and following up with the employee periodically to ensure the plan is up-to-date.

Documentation of Individual Accommodation Plans and Return to Work

OPTrust will maintain a process for the development of documented individual accommodation plans. The People team will develop and use a standard template for the development of individual accommodation plans and return-to-work programs.

Performance Management

OPTrust will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Career Development, Advancement and Redeployment

OPTrust will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development, advancement and redeployment to its employees with disabilities.

Amendment

The Management Human Resources & Compensation Committee (MHRCC) is responsible for amending this Policy. Any amendments will come into effect on the date the amendments are approved by the MHRCC or such other date as is determined when the amendments are approved.



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