

OLG CORPORATE POLICY

TITLE: Accessibility Standards for Customer Service
POLICY # : CP-06-01-001
OWNER: Legal - Accessibility
STATUS: Final

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PURPOSE

The Customer Service Standards of the Integrated Accessibility Standards Regulation, Ontario Regulation 191/11 was enacted on January 1, 2008. It was the first accessibility standard implemented under the Accessibility for Ontarians with Disabilities Act (AODA). This regulation is an important step to create a barrier-free and accessible Ontario by 2025.

The purpose of this policy is to:

- a) promote Ontario Lottery and Gaming Corporation's (OLG) compliance with the AODA Standards
- b) promote a culture that is aware of our obligations to make OLG's goods and services and facilities accessible to people with disabilities

APPLICATION AND SCOPE

This policy applies to OLG employees.

POLICY STATEMENT

OLG strives to provide goods and services and facilities in a manner that respects the dignity and independence and unique needs of people with disabilities. We are committed to giving people with disabilities the same level of quality and access to our goods and services and facilities that is available to other customers. When necessary, we will offer alternative options for people with disabilities to ensure accessibility.

DEFINITIONS

Assistive Devices: products or services that can help an individual carry out daily activities with greater ease and independence, such as a walker, a white cane used by a blind person or a person with low vision, a note-taking device, a personal oxygen tank, TTY (Telephone Teletype), or an amplification system.

Barrier: anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

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Disability: according to the Ontario Human Rights Code, also referenced by the AODA, disability means:

- 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
- a condition of mental impairment or a developmental disability
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- a mental disorder
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997

Disabilities may differ in severity, may be visible, invisible, and have effects which may come and go.

Employee: full-time, part-time, or contracted staff member; temporary or seasonal staff member; student; intern; consultant.

Guide Dog: a guide dog as defined in section 1 of the Blind Persons' Rights Act.

Service Animal: an animal is a service animal for 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 from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - (i) member of the College of Audiologists and Speech-Language Pathologists of Ontario
 - (ii) member of the College of Chiropractors of Ontario
 - (iii) member of the College of Nurses of Ontario
 - (iv) member of the College of Occupational Therapists of Ontario
 - (v) member of the College of Optometrists of Ontario
 - (vi) member of the College of Physicians and Surgeons of Ontario
 - (vii) member of the College of Physiotherapists of Ontario
 - (viii) member of the College of Psychologists of Ontario

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- (ix) member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

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.

Third Party: any person or entity that has agreed with OLG to provide services to the public on its behalf. This includes, but is not limited to, all third parties overseen by OLG’s Service Delivery Management, resort gaming facilities, OLG’s cGaming facilities, iGaming, and contest administration services.

REQUIREMENTS

1. Communication

- 1.1. OLG employees will respectfully take into account the customer’s disability when interacting or communicating with them.
- 1.2. OLG employees have been trained in how to interact and communicate with customers with disabilities guided by the following principles:
 - **Principle of Dignity:** refers to service being provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.
 - **Principle of Equal Opportunity:** refers to people with disabilities having an opportunity equal to that given to others to access your goods or services or facilities.
 - **Principle of Independence:** refers to allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
 - **Principle of Integration:** refers to service being provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable the person to access goods or services or facilities.

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2. Format of Documents

2.1. Upon request, documents will be provided to customers in alternative formats that will take into account the person’s disability.

3. Use of Assistive Devices

3.1. OLG recognizes that some individuals with disabilities use their own personal assistive devices in order to access goods and services and facilities. OLG will permit these individuals to use their assistive devices to obtain, use, or benefit from its goods and services and facilities.

3.2. OLG may offer a person with a disability other reasonable measures to assist the person in obtaining, using or benefiting from OLG’s goods and services and facilities. Where OLG has such other measures available, this will be documented in its respective policies, practices and procedures.

4. Support Persons

4.1. If a person with a disability is accompanied by a support person, OLG will ensure that both people are permitted to enter OLG premises, provided the support person agrees to applicable OLG rules and requirements, including age restrictions.

4.2. If a support person is necessary for the health and safety of a person with a disability, the support person must remain with the person with a disability at all times.

4.3. OLG, in consultation with a person with a disability and considering the available evidence, may determine that 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. If there is no other reasonable way to protect their health and safety then OLG will waive the payment (if any) of the support person’s admission to the premises.

4.4. For all events and promotions at any or all OLG sites, standard costs will apply to support persons accompanying a person with a disability.

5. Use of Service Animals

5.1. OLG will ensure that a person with a disability who is accompanied by a guide dog or other service animal is permitted to enter OLG premises that are open to the public and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises.

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5.2. If a service animal is excluded by law from the premises, other measures to enable the person with a disability to obtain, use or benefit from OLG’s goods or services may be used.

6. Notice of Disruptions in Services and Facilities

6.1. When possible, OLG shall give notice to public if there is a temporary or planned disruption affecting facilities or services that people with disabilities usually use in accessing OLG’s goods or services or facilities.

6.2. Notice of the disruption will include:

- a) The reason for the disruption
- b) Anticipated duration
- c) A description of what alternative facilities or services are available, if any

6.3. When a disruption occurs unexpectedly, notice shall be posted as soon as possible, at a conspicuous place on the OLG premises or provided by such other method reasonable in the circumstances.

7. Feedback Process

7.1. Feedback processes regarding the way OLG provides goods and services and facilities to people with disabilities will allow for comments in person, by telephone, in writing, by e-mail, or via OLG public website.

7.2. Feedback processes including actions required if a complaint is received shall be documented in OLG feedback/complaint management procedures.

8. Training

8.1. OLG will ensure appropriate levels of training are provided to employees on the provision of goods and services and facilities to people with disabilities.

8.2. OLG’s new hire training program incorporates an AODA Accessible Customer Service segment. Employees will be trained on an ongoing basis in connection with changes in OLG policies, practices and procedures.

8.3. OLG will keep records of the training provided, including dates when training was provided and the number of employees trained.

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9. Availability of Documents Required by AODA

- 9.1. As required by Ontario Regulation 191/11, OLG will make available to any person, upon request the following documents describing:
- OLG’s policies, practices and procedures governing the provision of goods and, services and facilities to people with disabilities
 - OLG’s policies, practices and procedures governing the use of guide dogs and service animals and support persons
 - The steps the OLG will take in connection with a temporary disruption of facilities or services usually used by people with disabilities
 - OLG’s policy on providing training on accessible customer service
 - OLG’s process for receiving and responding to feedback on the provision of goods or services or facilities to people with disabilities

10. Third Party Goods and Services

OLG will take measures to ensure third parties comply with AODA when providing goods and services and facilities on behalf of OLG. AODA provisions must be included in contracts, terms and conditions, policies, and/or other compliance documents.

ROLES AND RESPONSIBILITIES

GLC – Accessibility Department is responsible for:

- Developing and implementing this policy
- Reviewing and amending this policy to ensure ongoing compliance with AODA requirements
- Providing advice and direction on accessibility issues

OLG Management is responsible for:

- Ensuring that OLG employees are informed of this policy at the time of hire
- Ensuring OLG employees acknowledge that they have been informed of and understand this policy through training
- Monitoring current practices and staff performance to ensure compliance with this policy

OLG employees are responsible for:

- Ensuring that they understand the intent of this policy
- Complying with the provisions of this policy

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POLICY OWNER

GLC – Accessibility Department

Queries concerning this policy should be directed to the Senior Manager of Accessibility via e-mail at: ppokorny@olg.ca.

RELATED POLICIES AND PROCEDURES

- CP-06-01-002: AODA Integrated Accessibility Standards Policy

REFERENCES AND FORMS

- Accessibility for Ontarians with Disabilities Act
- Integrated Accessibility Standards, Ontario Regulation 191/11
- Ontario Human Rights Code

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REVISION / REVIEW HISTORY			
Version/Revision Date	Requested By	Updated By	Summary of Revision
August 16, 2016	AODA	Policy Services	Added and removed some definitions and restructured some sections to clarify requirements. Added clause on third party providers. Updated purpose section.
July 27, 2015	AODA	Policy Services	Updated roles section to remove requirement that management must ensure employees acknowledge awareness of the policy 'in writing'.
March 2015	AODA	CPS	Removed section on training topics.
August 2, 2012	Legal	Project Manager, Accessibility	Reformatted to current policy template.
July 16, 2010	Legal	Senior Manager of Accessibility	Amendments were made to the following sections: <ul style="list-style-type: none"> ▪ <i>Definitions:</i> Added definitions of: Barrier, Customer Feedback, Regulation, Standard ▪ <i>Purpose:</i> Reworded to clarify and reinforce Policy Statement ▪ <i>Format of Documents:</i> Added reference to alternative formats for documents to be provided on request ▪ <i>Use of Assistive Devices:</i> Added clarification that assistive devices will be used by people with disabilities to obtain, use or benefit from OLG's goods or services ▪ <i>Support Persons:</i> Added: <ul style="list-style-type: none"> ▪ a person with a disability will have access to their support person while on the premises ▪ requirement that a support person must remain with a person with a disability, if necessary for health and safety of the person with a disability ▪ standard admission costs will apply to support persons accompanying a person with a disability

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			<ul style="list-style-type: none"> ▪ <i>Use of Service Animal</i>: Added a person with a disability is permitted to keep the animal with him/her unless the animal is excluded by law from the premises ▪ <i>Notice of Disruptions in Services and Facilities</i>: Added wording to be included in the notice of disruption ▪ <i>Feedback Process</i>: Added statement that feedback process shall be documented to include actions required to take if the complaint is received ▪ <i>Training</i>: Added the topics covered by the training ▪ <i>Availability of Documents Required by AODA</i>: Added description of the policy documents available upon request ▪ <i>Roles and Responsibilities</i>: Added responsibilities for Policy Owner
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APPROVALS		
Approver	Authorization	Date
Tony Wong VP, Legal Services	Approved	August 17, 2016

EC / VP / BOARD OF DIRECTORS APPROVAL	
Approved by	Authorization Date
Original policy approved by SVP Legal	July 16, 2009

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