

OLG CORPORATE POLICY

TITLE: AODA Integrated Accessibility Standards
POLICY # : CP-06-01-002
OWNER: Legal - Accessibility
STATUS: Final

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PURPOSE

The Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) under the Accessibility for Ontarians with Disabilities Act (AODA) came into force on July 1, 2011 and was amended on July 1, 2016 to include the requirements of the Customer Service Standards Regulation (Previously Ontario Regulation 429/07). The regulation establishes standards to address barriers that people with disabilities face in the areas of information and communications, employment, and transportation, aspects of the design of public spaces, and customer service. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

The purpose of this policy is to ensure that Ontario Lottery and Gaming Corporation (OLG) complies with the Government of Ontario's Integrated Accessibility Standards Regulation.

APPLICATION AND SCOPE

This policy applies to all OLG employees.

POLICY STATEMENT

OLG is committed to creating an inclusive culture across the organization by preventing and removing barriers for people with disabilities. Where it is not possible to remove barriers, OLG will make efforts to accommodate people with disabilities in a timely, effective and suitable manner.

OLG supports the principles of the AODA and the Integrated Accessibility Standards Regulation. Our goal is to ensure accessibility for our employees and the public we serve.

DEFINITIONS

Accessible formats: may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by people with disabilities.

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

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.

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

- i. 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
- ii. a condition of mental impairment or a developmental disability
- iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language
- iv. a mental disorder
- v. 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.

Information: any document or electronic data that conveys meaning, regardless of format or the medium where it is stored.

Internet website: a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier and is accessible to the public.

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Kiosk: an interactive electronic terminal, including a point of sale device, intended for public use that allows users to access one or more services or goods or both.

New internet website: either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

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. Confidentiality of Information

Personal information concerning an individual's disability cannot be released without written consent of the individual and must be managed in a manner that is consistent with Freedom of Information Guidelines and Personal Information Protection Guidelines, where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required.

2. Accessibility policies

Through this AODA Integrated Accessibility Standards policy and related accessibility policies, OLG confirms our commitment to meet the needs of people with disabilities in a timely manner. OLG will make these documents available upon request and provide them in an accessible format upon request.

3. Accessibility plans

- 3.1. OLG will maintain a multi-year accessibility plan and review and update it once every five years.
- 3.2. OLG will post the plan on its website and provide it in accessible format upon request.
- 3.3. OLG will prepare an annual status report on the progress of measures taken to implement its strategy, post the report on its website and provide it in an accessible format upon request.

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4. Procuring or acquiring goods or services or facilities

OLG will incorporate accessibility features and criteria when procuring or acquiring goods or services or facilities, except where not practicable to do so. Where it is deemed not practicable to do so, OLG will provide an explanation upon request.

5. Self-service kiosks

OLG will incorporate accessibility features when designing, procuring or acquiring self-service kiosks, except where not practicable to do so.

6. Training

OLG will provide training to all employees, co-op students and volunteers on the requirements of accessibility standards and on the *Ontario Human Rights Code* as it pertains to people with disabilities.

7. Information and Communications

7.1. Feedback

OLG will ensure that its processes for receiving and responding to feedback are accessible to people with disabilities and will notify the public about the availability of accessible formats and communications supports.

7.2. Accessible formats and communication supports

- i. OLG shall provide or arrange for accessible formats and communication supports for people with disabilities in a timely manner that takes into account each person's accessibility needs.
- ii. OLG will consult with the person making the request to determine the suitability of an accessible format or communication support.
- iii. Communications supports will be provided at a cost that is no more than the regular cost charged to other people.

7.3. Accessible websites and web content

OLG will make its internet websites and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, except where not practicable to do so.

8. Employment

OLG's policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment, eg: Human Rights and Workplace Harassment Policy.

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9. Design of Public Spaces

OLG is committed to ensuring OLG facilities that are redeveloped or newly constructed will incorporate accessibility requirements into the planning, design and construction phases.

10. Customer Service

Refer to the OLG policy CP-01-001: Accessibility Standards for Customer Service.

11. Accessibility Reports

OLG will file an accessibility report with the Government of Ontario every two years, following the report filed in December 2013.

12. Third Party Goods and Services

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

ROLES AND RESPONSIBILITIES

OLG Accessibility Department (Legal) is responsible for:

- Reviewing and amending this policy to ensure ongoing compliance with AODA
- Filing accessibility reports with the Government of Ontario every two years

OLG Management is responsible for:

- Implementing this corporate policy and developing or amending applicable divisional procedures or documents in order to adhere to the corporate policy
- 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 practices and staff performance to ensure compliance with this policy
- Approving accessibility reports as required

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

RELATED POLICIES AND PROCEDURES

- Accessibility Standards for Customer Service Policy
- Human Rights & Workplace Harassment Policy

REFERENCES AND FORMS

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

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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 information to clarify requirements and policy references. Added new clause re 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	Section on design of public spaces added to address update in legislation.

APPROVALS		
Approver	Authorized Signature	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	January 30, 2013

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