



## INTRODUCTION

Last Updated: June 16, 2023

Online is committed to ensuring equal access and participation for people with all abilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

This policy applies to all employees, contractors, volunteers, and management of Online. In this policy, the word "customer" refers to a person who is reasonably expected to obtain, use or benefit from Online's services, whether or not the person paid for them.

## TRAINING

We are committed to training all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- our policies related to the Customer Service Standards
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

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We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

## ASSISTIVE DEVICES

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities. 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 our goods, services or facilities.

## COMMUNICATION

We communicate with people with disabilities in ways that take into account their disability. This may include the following, but is not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications. We will work with the person with disabilities to determine what method of communication works for them.

## SERVICE ANIMALS

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

## SUPPORT PERSONS

Online welcomes customers accompanied by a support person.

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

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- the person with a disability
- others on the premises

We make space for support persons on-site and ensure customers have access to their support persons at all times.

## NOTICE OF TEMPORARY DISRUPTION

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, this organization will notify customers promptly. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

- We offer to communicate in different ways, such as writing things down, reading things out loud, and taking extra time to explain things.
- Have paper and pens available to capture verbal communication in written forms.
- Offer a chair when longer conversations are needed.
- Offer a quiet space for learning or discussion.
- Sit down to engage with someone using a wheelchair.
- We use signs and documents that are easy to read, including using larger fonts and colour contrast. We make sure our printed material is designed to ensure readability.
- We write signs and documents in plain language.

## FEEDBACK

Online welcomes and responds promptly to feedback we receive on the accessibility of our services and the accessibility needs of our customers. Customer feedback will help us identify barriers and respond to concerns.

We document the actions we take to respond to the feedback we receive, and that information is available on request in a format that meets our customers' communication needs.

### PRACTICES:

- We invite feedback in the following ways:
  - Visit our reception desk, or contact us by phone, email, website or feedback form
- All feedback is directed to the People Care team who determines what action, if any, should occur.
- If the feedback requires us to follow up, the customer is notified that the request is being reviewed and when (s)he can expect a response.
- We advise the customer of the action we will take to address their feedback, if any.
- We respond to feedback in a way that meets the communication needs of our customers.

Online ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication support, on request.



## NOTICE OF AVAILABILITY OF DOCUMENTS

### PRACTICES:

- We let the public know that our accessibility and training policies are available in the following ways:
  - Posted on our website.
  - Through Onliners (in person, or by phone)

We provide our policies within a reasonable time frame, at no cost, and in a format that meets the needs of our customers.

## INFORMATION AND COMMUNICATIONS

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

We will also meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

## EMPLOYMENT

We notify Onliners, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodation is available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify Onliners that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an Onliner's accessibility needs due to a disability.



We will consult with Onliners when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the Onliner's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees. Maintain a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work.

Consider the accessibility needs of employees with disabilities as well as their individual accommodation plans when conducting performance management reviews, providing career development and advancement to employees, and when redeploying employees.

#### **PRACTICES:**

- Training includes appropriate interaction with the customers' assistive devices.
- We make space for assistive devices on-site and ensure customers have access to their assistive devices at all times.

## **CHANGES TO EXISTING POLICIES**

Any policies of this organization that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

