



THE ONTARIO FINANCING AUTHORITY
ACCESSIBILITY POLICY
REVISED: DECEMBER 2022

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1.0 PURPOSE

This policy describes the OFA's commitment to respect the dignity and independence of persons with disabilities and outlines our multi-year plan to comply with the [Accessibility for Ontarians with Disabilities Act, 2005](#) (AODA).

2.0 SCOPE

This Policy, together with Appendix A: Multi-Year Plan 2013-2021, is a requirement under the AODA that outlines the actions the OFA will put in place to improve opportunities for persons with disabilities. The creation of this Policy is in compliance with the [Integrated Accessibility Standards Regulation \(Ontario Regulation 191/11\)](#) (IASR), which applies to Information and Communications, Employment, Transportation, Design of Public Spaces, and Customer Service. As the OFA does not provide Transportation, or Design of Public Spaces, these two categories are not addressed in this Policy.

3.0 POLICY

3.1 STATEMENT OF COMMITMENT

The OFA is committed to ensuring equal access and participation for persons with disabilities. We are committed to treating persons with disabilities in a way that allows them to maintain their dignity and their independence. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under Ontario's accessibility laws.

We are also committed to meeting our ongoing obligations under the [Ontario Human Rights Code](#) respecting non-discrimination, and we understand that obligations under the AODA and its accessibility standards do not substitute or limit our obligations under the Code or obligations to persons with disabilities under any other law.

Our corporate policies and procedures are consistent with the principles of independence, dignity, integration and equality of opportunity for persons with disabilities.

3.2 INFORMATION AND COMMUNICATIONS

We communicate with persons with disabilities in ways that take into account their disability. [Upon request](#), we will provide information about our organization and its services, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs; and
- b) at no cost or 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 we determine that the information or communications cannot be converted into a suitable format, we will provide the requestor with:

- a) an explanation as to why the information or communications cannot be converted; and
- b) a summary of the information or communications that cannot be converted.

We will meet internationally-recognized [Web Content Accessibility Guidelines \(WCAG\) 2.0](#), Level AA public-facing website requirements in accordance with Ontario's accessibility laws.

3.3 OFA PREMISES

- a) **Assistive Devices.** We welcome persons with disabilities to use personal assistive devices when accessing our services or facilities. In cases where an 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 services or facilities.
- b) **Service Animals.** We welcome persons with disabilities and their service animals. Service animals are allowed on OFA premises.
- c) **Support Persons.** A person with a disability who is accompanied by a support person will be allowed to have that support person accompany them on OFA premises.

3.4 PROCUREMENT

We incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, including self-serve kiosks. If it is not possible or practicable to do so, we will provide an explanation upon request.

3.5 EMPLOYMENT

We notify employees, 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 accommodations are available upon request. We consult with job 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 employees 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 employee's accessibility needs due to a disability.

We will consult with employees 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.

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

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Where needed, we 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.

Our performance management, career development and organizational processes take into account the accessibility needs of all OFA employees.

3.6 TRAINING

We are committed to training all employees in accessible customer service, other Ontario accessibility standards and aspects of the Code that relate to persons with disabilities. We complete these requirements via LearnOn, the Ontario Public Service (OPS)'s internal learning and development platform. Accessibility training of our employees relates to their specific roles.

Additionally, we ensure OFA Board Members receive training appropriate to their role in overseeing OFA policies.

Training includes:

- the purpose of the AODA 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 services or facilities to people with disabilities; and
- what to do if a person with a disability is having difficulty in accessing our organization's services or facilities.

We train every newly hired employee and newly appointed Board member as soon as practicable, and also provide training in respect of any changes to the policies.

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

3.7 NOTICE OF TEMPORARY DISRUPTION

In the event of a planned or unexpected disruption to services or facilities, we will promptly notify persons with disabilities who may be affected. We will explain the reason for the disruption, its anticipated duration, and if alternative facilities or services are available. We may not be able to give advance notice if it is an emergency disruption.

3.8 FEEDBACK

We welcome feedback on this Policy and how we provide accessible customer service. Feedback will help us identify barriers and respond to concerns.

Feedback may be provided as follows:

- In person
- By phone: (416) 325-8000
- TTY: via Bell Relay Services
- By email: ofahr@ofina.on.ca
- By mail: Human Resources Coordinator, OFA 1 Dundas Street West, 12th Floor, Toronto ON M7A 1Y7

We ensure our [feedback process](#) is accessible to persons with disabilities by providing or arranging accessible formats and communications supports, upon request.

4.0 MODIFICATIONS TO THIS OR OTHER POLICIES

This Policy will be reviewed on an annual basis by the Business Services Branch. The OFA is committed to respecting the dignity and independence of persons with disabilities. Therefore, no changes will be made to this Policy, or any OFA policy, before considering the impact on persons with disabilities.

The OFA will review any OFA policy if it is brought to its attention that the policy does not respect the dignity and independence of persons with disabilities. All OFA employees are encouraged to review OFA policies for this purpose. If any OFA policy is determined to not respect the dignity and independence of persons with disabilities it will be modified or removed.

This Policy will be publicly available on the [OFA's website](#). Accessible formats are available upon request.

5.0 ROLES AND RESPONSIBILITIES

- a) Employees, contractors and temporary help are responsible for:
- complying with the OFA Accessibility Policy and Multi-Year Plan
 - providing accessible customer service, information, and communication
 - completing accessibility training as appropriate to their duties
 - identifying their accommodation needs, where applicable, to the relevant manager/supervisor or OFA HR Coordinator
 - where applicable, working with management, employees and the HR Coordinator to develop accommodation plans that meet their needs and that are practicable for the OFA to implement
- b) HR Coordinator is responsible for:
- disseminating the OFA Accessibility Policy and Multi-Year Plan and conducting an annual review of these documents in consultation with program areas as required
 - completing the online Accessibility Compliance Reporting, as required by the Accessibility Directorate of Ontario
 - facilitating the development of accommodation plans
 - monitoring the progress of the OFA Accessibility Policy and Multi-Year Plan
- c) Management is responsible for:
- identifying accessibility training relevant to the responsibilities of their employees
 - working with employees and the HR Coordinator to develop accommodation plans that meet the needs of employees, potential employees, contractors and temporary help, except where it is not practicable to do so
 - incorporating accessibility criteria and features in procurement practices
- d) Director, Strategic Corporate Services Division is responsible for:
- certifying the online accessibility compliance reporting
- e) Chief Executive Officer's Office is responsible for:
- providing executive oversight on compliance with the OFA Accessibility Policy and Multi-Year Plan, the IASR and the AODA
- f) Legal Branch is responsible for:
- advising on the OFA's obligations under the AODA, including any applicable regulations
 - reviewing this Policy and Multi-Year Plan and advising on related legal matters
- g) Senior Web Coordinator is responsible for:
- ensuring WCAG 2.0 level AA compliance on all public facing external websites as per timelines in Section 1. a) of the Multi-Year Plan

- keeping abreast of new developments in accessibility for online content and implementing new technologies as they become available and are assessed to be beneficial

APPENDIX A: MULTI-YEAR PLAN 2013 - 2021

1. INFORMATION AND COMMUNICATION

The OFA will implement the following steps in accordance with the OFA Accessibility Policy.

- a) **Internet.** Except where not practicable, the OFA will ensure all public-facing websites created after January 1, 2012, and all content including forms and documents on those websites, will conform to WCAG 2.0 Level AA. All Internet websites, and all content will conform by January 1, 2021. The foregoing requirements *exclude* live captioning and pre-recorded audio description. OFA systems staff will keep abreast of new developments in accessibility for online content and will implement new technologies as they become available and assessed to be beneficial. As per subsection 14(6)(a) of the IASR, in determining whether the requirements in this section 1(a) are “practicable”, it is necessary to consider, among other things, the availability of commercial software or tools or both.
- b) **Documents.** The OFA will ensure that all newly created documents, paper or electronic in any format created after January 1, 2012, that may be provided to the public, including responses to any future request under the [Freedom of Information and Protection of Privacy Act](#) (FIPPA), conform to accessibility standards. Employees will be encouraged to apply best practices such as creating digital documents that are readable by screen readers (i.e. created using the Microsoft Word Styles function) and paper documents in an easily legible font and font size for those with low vision.
- c) **Telephone.** The OFA will accept Text Telephone (TTY) telephone calls from members of the public and other third parties using Telephone Relay Services or equivalent services. A TTY is a device used by people with hearing disabilities. Confidential government information and information protected by FIPPA should not be communicated through relay services but may be communicated internally using TTY devices, where communications by email or in person would otherwise be inappropriate. This is currently effective.
- d) **Email.** Employees are encouraged to make email communications more accessible by avoiding the use of PDF attachments when possible and instead including content in the body of the email or a link to the HTML version.

2. OFA PREMISES

The OFA is committed to allowing clients, employees and third parties who may access our premises (temporary help, contractors, colleagues from the financial communities, etc.) to do so in a manner that takes into account any disability they may have.

- a) **Assistive Devices.** The OFA will ensure that employees who deal with third parties are familiar with various assistive devices and allow people to use their personal assistive devices to access our services. Assistive devices may include, but are not limited to wheelchairs, walkers, white canes, oxygen tanks, portable chalk boards, screen reading software, and electronic communication devices.
- b) **Service animals and support persons.** The OFA is committed to welcoming people with disabilities who are accompanied by a service animal or support person when accessing the OFA premises. At no time will a person with a disability who is accompanied by a support person or service animal be prevented from having access to their support person or service animal while on the OFA premises.

3. PROCUREMENT

In accordance with its procurement policy, the OFA will incorporate accessibility criteria and features as required when procuring or acquiring goods, services or facilities, except where it is not practicable to do so. Where it is determined to not be practicable, the OFA will be prepared to provide a written explanation.

- a) **Requests for Bids** and other related procurements such as Requests for Services, will require vendors to demonstrate that they are inclusive and accessible as an employer and as a provider of goods and/or services.
- b) The OFA will incorporate accessibility features when procuring or acquiring **Self-Service Kiosks**. Accessibility features may be technical, structural, and/or the access path to the kiosk. For the purposes of this section, a self-service kiosk is “an interactive electronic terminal, including a point-sale device, intended for public use that allows users to access one or more services or products or both.”

4. EMPLOYMENT

The OFA will assess and eliminate barriers in recruiting new employees and in managing existing employees.

- a) **Recruitment.** The OFA will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. The OFA will include language in job ads and other recruitment methods notifying potential candidates that we will provide accommodations for disabilities in accordance with legislative standards, on request, to support candidates’ participation in all aspects of the recruitment process. Further, we will remove barriers in the job ads, such as jargon and complex language. Applicants who have been chosen for the selection process will be informed that the OFA will provide accommodations for disabilities during the process. If accommodation is required it will be developed in consultation with the candidate

who made the request. All successful applicants will be notified of the OFA's policies for accommodating employees with disabilities when offering employment.

- b) **Emergency Response Information.** Managers will consult with their direct reports to identify individuals who require assistance in the event of an emergency, whether permanently or temporarily, and to make an individual emergency response plan that takes into account their disability. This may include providing emergency response information in accessible formats.
- c) **Supporting Employees.** The OFA will take into account the accessibility needs of employees with disabilities. Managers, Business Services staff, and other parties such as external vendors will, as needed, plan accommodations in consultation with employees who require them. The OFA will ensure such accommodations are in accordance with the following requirements of sections 28-32 of the IASR:
- Documented individual accommodation plans
 - Return to work process
 - Performance management
 - Career development and advancement
 - Redeployment.
- d) **Informing Employees.** The OFA will inform all employees of this commitment by requiring reading of the Accessibility Policy and Multi-Year Plan, as well as via staff meetings and manager-employee meetings. Management understands that disabilities may be temporary or permanent and may develop at any time during a period of employment.

5. TRAINING FOR EMPLOYEES

The OFA will provide training to all employees as described below. Training will be provided via courses on LearnON that have been developed in consultation with people with disabilities. All new employees will finish training within six months of hire. Additional training may be required with developments such as in technology or new regulations. There must be a record of each training opportunity an employee completes. In addition, senior managers are encouraged to have a commitment to accessibility in their individual performance plans.

- a) **Integrated Accessibility Standards Regulation.** All employees will be trained on the requirements of the IASR and on the Human Rights Code as it pertains to persons with disabilities. All employees will complete training on accessibility specific to the duties of their position, such as Information Technology staff training on accessible website development and managers training on managing employees with disabilities.

- b) **Accessibility Standards for Customer Service.** Employees who deal with the public or other third parties on behalf of the OFA, and all employees who are involved in the development and approvals of policies, practices and procedures on the provision of goods or services to the public or other third parties, will take Customer Service training. This training will be provided to employees entering such positions within three months of commencement of duties.

6. NOTICE OF TEMPORARY DISRUPTION

- a) **External.** The OFA will provide notice on its external website and/or over the telephone in the event of a planned or unexpected disruption in its services used by people with disabilities.
- b) **Internal.** The OFA will provide notice on its internal Portal site and/or over email and/or over phone in the event of a planned or unexpected disruption of supports for employees with disabilities.

Notices will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available. This is currently effective.

7. FEEDBACK

- a) **External.** Comments regarding how well our service standards for clients, candidates for employment, and third parties with disabilities are being met are welcome and appreciated. Feedback can be provided by any of the means/formats identified in the feedback process. A general email address and phone number are available on our website. All feedback regarding accessibility will be forwarded to the attention of the OFA HR Coordinator.
- b) **Internal.** Comments regarding how well we are supporting our employees with disabilities are welcomed and appreciated. Feedback can be made directly to the OFA HR Coordinator by phone or email or anonymously through the Electronic Suggestion Box on the OFA Portal.

Persons who submit feedback can expect to hear back within 5 business days. The OFA will take all reasonable measures to rectify the situation regarding any complaint received. The OFA will consult with persons with disabilities through the review and consideration of all feedback received.

8. ANNUAL STATUS REVIEW

The OFA will measure the success of this Multi-Year Plan by checking its progress every

December. This will provide a view of what has been accomplished and what still needs to be done. The progress report will be posted publicly as part of the OFA's Multi-Year Plan.

9. FUTURE COMMITMENTS

By January 1, 2021, all external websites and web content created after January 1, 2012, will conform to WCAG 2.0 level AA. Content published prior to 2012 will be made available in an accessible format upon request.

10. PROGRESS REPORT CHART (CUMULATIVE AS OF FIRST DATE IMPLEMENTED TO JANUARY 1, 2018)

As of January 1, 2014	As of January 1, 2015	As of January 1, 2016	As of January 1, 2017	As of January 1, 2018
<p>General Requirements</p> <ul style="list-style-type: none"> • Accessibility Policy & Multi Year Plan 	<p>General Requirements</p> <ul style="list-style-type: none"> • OFA Accessibility Policy & Plan reviewed and updated 	<p>General Requirements</p> <ul style="list-style-type: none"> • Filed an Accessibility Compliance Report in December 2015 		<p>General Requirements</p> <ul style="list-style-type: none"> • Filed an Accessibility Compliance Report in December 2017
<p>Information & Communications</p> <ul style="list-style-type: none"> • Accessible feedback processes in place • Will accept TTY phone calls • New public-facing websites conform to WCAG 2.0 Level AA 	<p>Information & Communications</p> <ul style="list-style-type: none"> • All documents, paper or electronic in any format, that may be provided to the public, including responses to any future request under the FIPPA, will conform to accessibility standards, as set out by the IASR 			
<p>Procurement</p>				

As of January 1, 2014	As of January 1, 2015	As of January 1, 2016	As of January 1, 2017	As of January 1, 2018
<ul style="list-style-type: none"> • Accessibility integrated into all Requests for Bids and other related procurements 				
<p>Employment</p> <ul style="list-style-type: none"> • Emergency Response Information • Workplace Violence Risk Assessment • Accessible Recruitment • Supporting Employees • Training on Accessibility – Customer Service, general Ontario Human Rights Code, IASR & AODA • Informing Employees 	<p>Employment</p> <ul style="list-style-type: none"> • Training on Accessibility – general Information and Communications, job-specific, Employment Standards for Managers 			
			<p>Training</p> <ul style="list-style-type: none"> • Email communication released in August 2016 to Managers and Employees on the 6 accessibility courses on LearnOn 	

11. PROGRESS REPORT CHART (CUMULATIVE AS OF JANUARY 1, 2019 TO JANUARY 1, 2023)

As of January 1, 2019	As of January 1, 2020	As of January 1, 2021	As of January 1, 2022	As of January 1, 2023
	General Requirements <ul style="list-style-type: none"> • Filed an 2019 Accessibility Compliance Report 		General Requirements <ul style="list-style-type: none"> • Filed an 2021 Accessibility Compliance Report in December 2021 • New MYP to be developed in FY 22/23 	General Requirements <ul style="list-style-type: none"> • MYP to conform with reporting template in 23/24
		Information & Communications <ul style="list-style-type: none"> • All external websites and web content conform to WCAG 2.0 Level AA 		
Procurement				

As of January 1, 2019	As of January 1, 2020	As of January 1, 2021	As of January 1, 2022	As of January 1, 2023
	<ul style="list-style-type: none"> Language added to RFB/RFS templates to indicate vendors responsibility to comply with requirements under the OHRC, ODA and AODA 			
<p>Employment</p> <ul style="list-style-type: none"> OFA HR manages the development, support and records of accommodation plans 			<p>Future Workspace</p> <ul style="list-style-type: none"> Ensure accessibility is prioritized in redesign of physical workspace 	<p>Future Workspace</p> <p>Ensure accessibility is prioritized in redesign of physical workspace Accessibility prioritized and integrated into the redesigned workspace completed in November, 2022</p>

As of January 1, 2019	As of January 1, 2020	As of January 1, 2021	As of January 1, 2022	As of January 1, 2023
	Training Email communication released to Managers and Employees on the 4 accessibility courses available on LearnOn	Training <ul style="list-style-type: none"> Completed internal AODA training audit to ensure compliance of mandatory training requirements 	Training <ul style="list-style-type: none"> Email communication released to Managers and Employees on any new accessibility courses available on LearnOn 	Training <ul style="list-style-type: none"> Email communication released to Managers and Employees on mandatory training for all new employees