



Accessible and Inclusive Service Delivery (AODA)

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Purpose

To outline London Hydro's commitment to providing accessible services to customers, employees and all persons that we serve.

Scope

This policy applies to all persons who deal with members of the public or other third parties on behalf of London Hydro, whether the person does so as an employee, member of the Board of Directors, agent, volunteer, student on placement, or otherwise and all persons who participate in developing London Hydro's policies, practices, and procedures governing the provision of goods and services to members of the public or other third parties. Violation of this policy and any supporting practice will result in discipline up to and including discharge.

Policy Statement

London Hydro is committed to achieving a barrier-free environment for our customers, community and employees and providing quality goods and services that are accessible to all persons that we serve.

Questions: If anyone has a question about these policies, or if the purpose of a policy is not understood, an explanation will be provided by the Public Relations and Corporate Communications Department.

This over-arching policy document covers two specific policy areas:

1. Accessible Customer Service
2. Integrated Accessibility Standards

Section One – Accessible Customer Service Policy

In accordance with The Accessibility for Ontarians with Disabilities Act, 2005 (the “AODA”) this first of two sections addresses:

1. the provision of goods and services to persons with disabilities;
2. the use of assistive devices by persons with disabilities;
3. the use of service animals by persons with disabilities;
4. the use of support persons by persons with disabilities;
5. notice of temporary disruptions in services and facilities;
6. training;
7. customer feedback regarding the provision of goods and services to persons with disabilities; and
8. notice of availability and format of documents.

1-1. The Provision of Goods and Services to Persons with Disabilities

London Hydro is committed to providing quality goods and services that are accessible to all persons that we serve. London Hydro will use reasonable efforts to ensure that its policies, practices, and procedures are consistent with the following principles:

- London Hydro’s goods and services are provided in a manner that respects the dignity and independence of persons with disabilities;
- Provision of London Hydro’s goods and services to persons with disabilities are integrated with those provided to persons who do not have disabilities unless an alternative measure is necessary to enable a person with a disability to obtain, use or benefit from London Hydro goods and services; and
- Persons with disabilities are given an opportunity equal to that of persons without disabilities to obtain, use or benefit from London Hydro’s goods and services.
- When communicating with a person with a disability, London Hydro will do so in a manner that takes into account the person’s disability.

1-2. Assistive Devices and other Measures that Assist with Accessibility

A person with a disability may provide their own assistive device for the purpose of obtaining, using and benefiting from London Hydro’s goods and services. Exceptions may occur in situations where London Hydro has determined that the assistive device may pose a risk to the health and safety of a person with a disability or the health and safety of others on the premises.

In these situations and others, London Hydro may offer a person with a disability other reasonable measures to assist him or her in obtaining, using, and benefiting from London Hydro goods and services, where London Hydro has such other measures available.

It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

1-3. Service Animals

Persons with a disability may enter premises owned and operated, or operated, by London Hydro accompanied by a service animal and keep the animal with them if the public has access to such premises and the animal is not otherwise excluded by law. If a service animal is excluded by law, London Hydro will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from London Hydro's goods and services.

If it is not readily apparent that the animal is a service animal, London Hydro may ask the person with a disability for a letter from a physician or nurse confirming that the person requires the animal for reasons relating to his or her disability. London Hydro may also, or instead, ask for a valid identification card signed by the Attorney General of Canada or a certificate of training from a recognized guide dog or service animal training school.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

1-4. Support Persons

A person with a disability may enter premises owned and operated, or operated, by London Hydro with a support person and have access to the support person while on the premises.

London Hydro may require a person with a disability to be accompanied by a support person while on London Hydro premises in situations where it is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises. A support person, when assisting a person with a disability to obtain, use or benefit from London Hydro's goods and services, will be permitted to attend at no charge where an admission fee is applicable.

1-5. Notice of Temporary Disruptions in Services and Facilities

London Hydro is aware that the operation of its services and facilities is important to the public. However, temporary disruptions in London Hydro's services and facilities may occur due to reasons that may or may not be within the London Hydro's control or knowledge.

London Hydro will make reasonable effort to provide notice of the disruption to the public, including information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if applicable. London Hydro will make reasonable effort to provide prior notice of planned disruption if possible, recognizing that in some circumstances such as in the situation of unplanned temporary disruption, advance notice will not be possible. In such cases, London Hydro will provide notice as soon as possible.

When temporary disruptions occur to London Hydro's services or facilities, London Hydro will provide notice by posting the information in visible places, or on London Hydro's website (www.londonhydro.com), or by any other method that may be reasonable under the circumstances as soon as reasonably possible.

1-6. Training

London Hydro will ensure that all persons to whom this policy applies receive training as required by the Accessibility Standards for Customer Service. The amount and format of training given will be tailored to suit each person's interactions with the public and his or her involvement in the development of policies, procedures, and practices pertaining to the provision of goods and services.

The content of the training will include:

- A review of the purposes of the AODA;
- The requirements of the Accessibility Standards for Customer Service (Ontario Regulation 429/07);
- Instruction on London Hydro's policies, procedures, and practices pertaining to the provision of goods and services to persons with disabilities;
- How to interact and communicate with persons with various types of disabilities;
- What to do if a person with a particular type of disability is having difficulty accessing London Hydro's goods or services;
- How to interact with persons with disabilities who use assistive devices or who require the assistance of a support person or service animal; and
- Information about the equipment or devices available on London Hydro premises that may help with the provision of goods or services to persons with disabilities.

Timeline for Training

Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur to London Hydro policies, procedures, and practices governing the provision of goods or services to persons with disabilities.

Records of Training

London Hydro will keep records of the training, including the date on which training is provided and the number of individuals to whom it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* (MFIPPA).

1-7. Feedback

London Hydro is committed to providing high quality goods and services to all members of the public it serves. Feedback from the public is welcomed as it may identify areas that require change and encourage continuous service improvements.

Feedback from a member of the public about the delivery of goods and services to persons with disabilities may be given by telephone, in person, in writing, in electronic format or through other methods.

- 1-8. Information about the feedback process will be readily available to the public and notice of the process will be posted on London Hydro's website (www.londonhydro.com) and/or in other appropriate locations.
- 1-9. Availability and Format of Documents Required by the Accessibility Standards for Customer Service (Ontario Regulation 429/07)
- a. All documents required by the Accessibility Standards for Customer Service, including London Hydro's Accessible Customer Service policies, procedures, and practices, notices of temporary disruptions, training records, and written feedback process are available upon request, subject to MFIPPA.
 - b. When providing a document to a person with a disability, London Hydro will provide the document, or the information contained in the document, in a format that takes the person's disability into account.
 - c. Notice of the Availability of Documents
- Notice of the availability of all documents required by the Accessibility Standards for Customer Service will be posted on London Hydro's website, and available through Corporate Communications & Public Relations.

Section Two - Integrated Accessibility Standards

This second of two policies in this document has been established by London Hydro to govern the provision of services with Regulation 191/11, "Integrated Accessibility Standards" ("Regulation") under the *Accessibility for Ontarians with Disabilities Act, 2005*.

Statement of Commitment: London Hydro is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act*. This policy will be implemented in accordance with the time frames established by the Regulation.

These standards are developed to break down barriers and increase accessibility for persons with disabilities in the areas of information and communications and employment.

London Hydro is governed by this policy as well as the Accessibility Standards for Customer Service Policy and the *Accessibility for Ontarians with Disabilities Act, 2005* in meeting the accessibility needs of persons with disabilities.

2-1. Accessibility Plan

London Hydro will develop, maintain and document an Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

The Accessibility Plan will be reviewed and updated at least once every five years, and will be posted on the company's website. Upon request, London Hydro will provide a copy of the Accessibility Plan in an accessible format.

2-2. Accessibility Plan Training

London Hydro will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the *Human Rights Code* as it pertains to persons with disabilities, to

- all its employees and volunteers;
- all persons who participate in developing London Hydro's policies; and,
- all other persons who provide goods, services or facilities on behalf of the company.

The training will be appropriate to the duties of the employees, volunteers and other persons. Employees will be trained when changes are made to the accessibility policy. New employees will be trained as soon as practicable. London Hydro will keep a record of the training it provides.

2-3. Information and Communication Standards

a. Feedback

London Hydro will continue to ensure that its process for receiving and responding to feedback is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

b. Accessible Formats and Communication Supports

Upon request, London Hydro will provide, or will arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to disability.

London Hydro will consult with the person making the request in determining the suitability of an accessible format or communication support. London Hydro will also notify the public about the availability of accessible formats and communication supports.

c. Accessible Websites and Web Content

London Hydro will ensure that our Internet websites, including web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level AA except where this is impracticable.

2-4. Employment Standards

a. Recruitment, Assessment or Selection Process

London Hydro will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

London Hydro will notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, London Hydro will consult with the applicant and provide, or arrange for the provision of, a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

When making offers of employment, London Hydro will notify the successful applicant of its policies for accommodating employees with disabilities.

b. Employees

i. Supports

London Hydro will continue to inform its employees of its policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.

ii. Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, London Hydro will consult with the employee to provide, or arrange for the provision of, accessible formats and communication supports for information that is needed to perform his/her job, and information that is generally available to other employees.

In determining the suitability of an accessible format or communication support, London Hydro will consult with the employee making the request.

iii. Workplace Emergency Response Information

London Hydro will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if London Hydro is aware of the need for accommodation due to the employee's disability. London Hydro will provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, London Hydro will, with the consent of the employee, provide the workplace emergency response information to the person designated by London Hydro to provide assistance to the employee.

London Hydro will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed.

iv. Documented Individual Accommodation Plans

London Hydro will maintain a written process for the development of documented individual accommodation plans for employees with disabilities.

If requested, information regarding accessible formats and communications supports provided will also be included in individual accommodation plans.

In addition, the plans will include individualized workplace emergency response information (where required), and will identify any other accommodation that is to be provided.

v. Return to Work Process

London Hydro maintains a documented return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process outlines the steps London Hydro will take to facilitate the return to work and will include documented individual accommodation plans as part of the process.

This return to work process will not replace or override any other return to work process created by or under any other statute (e.g., the *Workplace Safety Insurance Act, 1997*).

vi. Performance Management, Career Development and Advancement & Redeployment

London Hydro will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when conducting performance management, providing career development and advancement to employees, or when redeploying employees.

Definitions

Assistive Device - A device used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations covered by the Customer Service Standard.

Disability

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

Guide Dog - A guide dog as defined in Section 1 of the Blind Persons' Rights Act is a dog trained as a guide for a blind person and having qualifications prescribed by the regulations under the Blind Persons' Rights Act.

Nurse - A Registered Nurse or Registered Practical Nurse who is a registered member in good standing with the College of Nurses of Ontario.

Physician - A physician who is a registered member, in good standing, with the College of Physicians and Surgeons of Ontario.

Service Animal - Any animal used by a person with a disability for reasons relating to the disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or where the person provides a letter from a physician or nurse confirming that he or she requires the animal for reasons relating to his or her disability; or a valid identification card signed by the Attorney General of Canada or a certification of training from a recognized guide dog or service animal training school.

Support Person - A person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to goods or services.

Applicable Legislation

Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA")

Ontario Human Rights Code (OHRC)

Related Information

Policy and Procedure – Accommodation of Employees

Integrated Accessibility Standards – Multi-Year Plan