

Integrated Accessibility Standards Regulation Policy



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One Customer at a Time.™

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Purpose

This policy is drafted in accordance with the Integrated Accessibility Standards (Ontario Regulation 191/11) and addresses how Exchange Solutions achieves or will achieve accessibility by meeting the requirements of the regulation. The requirements will be met within the timeframes set in the Regulation.

The requirements of the regulation include:

- the establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines Exchange Solutions' strategy to prevent and remove barriers and meet its requirements under this Regulation;
- the incorporation of accessibility features when designing, procuring or acquiring self-service kiosks;
- training;
- the specific requirements under the Information and Communication Standards, the Employment Standards and the Design of Public Spaces Standards;

Definitions

- a) **Accessible formats** may include, but are not limited to, large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities;
- b) **Accommodation** means the special arrangements made or assistance provided so that customers with disabilities can participate in the experiences available to customers without disabilities. Accommodation will vary depending on the customer's unique needs.
- c) **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 communication.
- d) **Communication** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received;
- e) **Conversion ready** means an electronic or digital format that facilitates conversion into an accessible format;

- f) **Disability** is:
- 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 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
 - 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.
- g) **Information** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- h) **Maintenance** mean activities that are intended to keep existing public spaces and elements in existing public spaces in good working order; or to restore the spaces or elements to their original condition, ie: include painting and minor repairs.
- i) **Redeveloped** means planned significant alterations to the public spaces, but does not include maintenance activities, environment mitigation or environmental restoration.
- j) **Volunteer** may include a person who voluntarily undertakes a task on behalf of Exchange Solutions.

Statement of Organizational Accessibility Commitment

Exchange Solutions is committed to the principles outlined in the Accessibility for Ontarians with Disabilities Act, 2005 and to meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the Act.

Our Accessibility Vision

Exchange Solutions vision delivers intelligent customer engagement programs to drive valuable customer behaviour change. We are committed to include Ontarians of all abilities in realizing our vision.

Accessibility Goals

Exchange Solutions complies with the Accessibility for Ontarians Act, 2005 (AODA). We view accessibility as providing our employees, customers and stakeholders with uninhibited access to all our services and information. Our goal is to be a barrier-free organization by identifying, removing and preventing barriers that may limit the involvement of people regardless of ability. Most importantly, the core principles of the Act - independence, dignity, integration, equality of opportunity for people with disabilities - are aligned with inclusion, our strategy to give persons with disabilities opportunity equal to that given to others to obtain, use or benefit from the goods and services provided on behalf of Exchange Solutions.

Our Accessibility Principles

- To promote a healthy, barrier-free work environment where employees can participate fully in all aspects of their job;
- To be a great place to work and celebrate our people by creating a rewarding and meaningful experience that is accessible to all employees, customers, stakeholders and people with disabilities;
- To maintain a comprehensive Accessibility Policy and a Five-year Accessibility Plan;
- To provide, through our ongoing work, a range of accessibility services and support for people with disabilities;
- To ensure that our information and communications to employees, customers and stakeholders are accessible.

Mandatory Requirements

General

Accessibility Policy and Plans

- The Accessibility Policy and Multi-Year Accessibility Plan (“the plan”) outlines the strategy to prevent and remove barriers for five years between 2014 and 2018, and to meet its requirements as outlined in the regulation;
- The plan is posted on the Exchange Solutions intranet and website at www.exchangesolutions.com and will be provided in alternate formats upon request;
- The plan will be reviewed and updated at least once every five years;

Self- Service Kiosks

Accessibility features will be incorporated when designing, procuring or acquiring any self-service kiosks.

Training

Exchange Solutions ensures that training is provided on the requirements of accessibility standards referred to within the Integrated Accessibility Standards (Ontario Regulation 191/11) and on the Human Rights Code as it pertains to persons with disabilities for,

- All employees and volunteers;
- All persons who participate in developing Exchange Solutions’ policies; and
- All other persons who provide goods, services or facilities on behalf of Exchange Solutions.

The training provided is appropriate to the duties of employees, volunteers and other persons;

Training is provided as on an ongoing basis to employees, volunteers and other persons;

Where there are changes to the Integrated Standards Accessibility Policy, training will be provided with regard to those changes;

Exchange Solutions will maintain a record of the dates of when training is provided and the number of individuals to whom it was provided;

Information and Communication Standards

Feedback

Exchange Solutions Customer Feedback process is accessible to persons with disabilities and does provide or arrange for the provision of accessible formats and communication supports upon request.

Accessible Formats and Communication Supports

Exchange Solutions will, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,

- a. In a timely manner that takes 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.

Exchange Solutions will consult with the person making the request in determining the suitability of an alternative format or communication support.

Accessible websites and web content

Exchange Solutions new internet, intranet websites and web content on those sites conforms to the WCAG 2.0, in accordance with the Integrated Accessibility Standards Regulation.

- a. All new internet websites and web content on those sites will comply to the WCAG 2.0 Level A by January 1, 2015;
- b. As of January 1, 2021 all internet, intranet and web content will conform with the WCAG 2.0 Level AA, other than: success criteria 1.2.4 Captions (Live) and success criteria 1.2.5 Audio Descriptions (Pre-recorded);
- c. Websites and web content, including web-based applications, that Exchange Solutions controls directly or through a contractual relationship that allows for modification of the product, are included in this timeline, where applicable.

Employment Standards

Recruitment

- a. Exchange Solutions notifies its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes;
- b. During a recruitment process, applicants who are individually selected to participate in an assessment or selection process are notified that accommodations are available upon request in relation to the materials or processes use.
- c. If a selected applicant requests an accommodation, Exchange Solutions consults with the applicant, having regard for the applicant's accessibility needs, on the provision of a suitable accommodation;
- d. When making an offer of employment, Exchange Solutions will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing employees of supports

Exchange Solutions informs its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on job accommodation that take into account the employee's accessibility needs due to a disability;

- a. New employees will be informed as soon as possible after they begin their employment;
- b. Where there are changes to existing policies on the provision of job accommodation, all employees will be provided updated information.

Accessible formats and communication supports for employees

Where an employee requests it, Exchange Solutions will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for;

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

Exchange Solutions will consult with the employee making the request in determining the suitability of an accessible format or communication support.

Workplace Emergency Response Information

Exchange Solution provides individual workplace emergency response information to employees who have a disability;

- a. Where the disability is such that individual information is necessary, and;
- b. Where Exchange Solutions is aware of the need for accommodation due to the employee's disability.

If an employee with individualized workplace emergency response information requires assistance and provides consent, Exchange Solutions will provide individualized information to the person designated by Exchange Solutions to provide assistance to the employee.

Individualized information is provided as soon as possible after Exchange Solutions becomes aware of the need for accommodation due to an employee's disability.

Exchange Solutions will review the individualized workplace emergency response information;

- a. When the employee moves to a different location
- b. When the employee's overall accommodation needs or plan are reviewed
- c. When Exchange Solutions reviews its general emergency response policies

Documented Individual Accommodation Plans

Exchange Solutions will develop a written process for the development of Individual Accommodation Plan for employees with disabilities

Performance Management; Career Development and Advancement

Where Exchange Solutions uses performance management for its employees, the accessibility needs of employees with disabilities, and individual accommodation plans are taken into account.

Design of Public Spaces Standards

Obtaining Services

Service Counters

- a. Exchange Solutions will provide a counter low enough that is accessible to people who use mobility aids such as wheelchairs;
- b. The counter has sufficient clear space for the person's knees;
- c. The service counter is clearly identified with sufficient signage

Waiting Areas

- a. Seating in Exchange Solutions waiting areas has fixed seating and is accessible for someone using a mobility aid;

Maintenance

Exchange Solutions maintenance procedures for the accessible parts of its public spaces, includes posting of regular maintenance schedules and letting people know about alternatives arrangements. This also includes the handling of temporary disruptions in service when an accessible part of Exchange Solutions public space stops working.