

ONTARIO

Ontario Electricity Financial Corporation

OEFC ACCESSIBILITY POLICY

OEFC Accessibility Policy

1.0 PURPOSE

This policy describes the OEFC's commitment to respect the dignity and independence of people with disabilities and outlines our multi-year plan to compliance with the [Accessibility for Ontarians With Disabilities Act](#) ("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 OEFC will put in place to improve opportunities for people with disabilities. The creation of this policy is in compliance with the [Integrated Accessibility Standards Regulation \(Ontario Regulation 191/11\)](#), which applies to Information and Communications, Employment, Transportation Design of Public Spaces, and Customer Service. As the OEFC does not provide transportation or design public spaces, these two categories are not addressed in this policy.

As the OEFC has no employees, designated officers of OEFC are Ontario Financing Authority ("OFA") employees, and the OEFC's mandate, which includes managing its debt, financial risks and liabilities, entering into financial and other agreements relating to the supply of electricity in Ontario, and providing financial assistance to the successor corporations of Ontario Hydro, is carried out by OFA staff. As such, the OEFC's interaction with the public is limited and, with the exception of providing information through its website and other means, it does not provide services to the public. Nevertheless, the OEFC is committed to accessibility for persons with disabilities in performing all its functions.

3.0 POLICY RULES

3.1 Statement of Commitment

The OEFC is committed to excellence, including in its interactions with people with disabilities. We are committed to providing barrier-free recruitment and employment. We are committed to communicating and providing information in an accessible manner and to using resources that have been developed in consultation with people with disabilities.

3.2 Compliance with OFA Accessibility Policy

As the OEFC has no employees and designated/appointed officers of the OEFC are OFA employees, the OEFC is required to comply with the applicable provisions of the OFA Accessibility Policy (the "OFA Policy"), as amended from time to time. For greater certainty:

- For the purposes of the OEFC, all references in the OFA Policy to the OFA Policy and Multi-year Plan shall be deemed to refer to this OEFC Accessibility Policy and Multi-year Plan, and references to the OFA shall be deemed to refer to OEFC, as applicable.
- All relevant Policy Rules as set out in Article 3.0 of the OFA Policy are deemed to be applicable to OEFC.

- The Roles and Responsibilities of OFA staff, employees, contractors and temporary help as set out in Article 5.0 of the OFA Policy shall apply to OFA staff, employees, contractors and temporary help in relation to any work performed on behalf of the OEFC.
- The Training requirements as set out in Article 3,6 of the OFA Policy and Article 5 of Appendix A to the OFA Policy shall apply to all OFA staff, including designated/appointed OEFC officers, who perform work on behalf of the OEFC.

For the purpose of OEFC matters, in the event of a conflict between this Policy and the OFA Policy, the provisions of this Policy shall prevail.

4.0 MODIFICATIONS TO THIS OR OTHER POLICIES

This Policy will be reviewed on an annual basis. The OEFC is committed to respecting the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy, or any OEFC policy, before considering the impact on people with disabilities. The OEFC will review any OEFC policy if it is brought to its attention that the policy does not respect the dignity and independence of people with disabilities. All staff are encouraged to review OEFC policies for this purpose. If any OEFC policy is determined to not respect the dignity and independence of people with disabilities it will be modified or removed.

APPENDIX A: Multi-Year Plan 2013 - 2021

1. Information and Communication

The OEFC will implement the following steps in accordance with the OEFC Accessibility Policy, as amended from time to time.

- a) **Internet:** Except where not practicable¹, the OEFC will ensure that all public-facing websites created after January 1, 2012, and all content including forms and documents on those websites, 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.
- b) **Documents.** The OEFC 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. Staff will be encouraged to apply best practices such as creating digital documents that are readable by screen readers (i.e. created using Microsoft Word Styles) and paper documents will be in an easily legible font/font size for those with low vision.
- c) **Telephone.** The OEFC will accept Text Telephone (“TTY”) telephone calls from members of the public and other third parties using Telephone Relay Services (“TRS”) 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.
- d) **Email.** The OEFC is encouraged to make e-mail communications more accessible by avoiding the use of PDF attachments when possible and instead include content in the body of the email or a link to the HTML version.

¹ As per subsection 14(6)(a) of the O.Reg 191/11, in determining whether the requirements in section 1(a) of the Policy are “practicable”, it is necessary to consider, among other things, the availability of commercial software or tools or both.

2. OEFC Premises

The OEFC 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 OEFC will ensure that staff 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 OEFC is committed to welcoming people with disabilities who are accompanied by a service animal or support person when accessing the OEFC 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 OEFC premises.

3. Procurement

In accordance with its procurement policy, the OEFC must 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 OEFC 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 OEFC 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. Notice of temporary disruption

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

5. Feedback process

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 made by e-mail or verbally on the telephone. A general email address and phone number are available on our website. All emails and phone messages regarding accessibility will be forwarded to the attention of the OFA **Human Resources Coordinator**.

Individuals who submit feedback can expect to hear back within **two week's time**. **The OEFC will take all reasonable measures to rectify the situation regarding any complaint received. The OEFC will consult with persons with disabilities through the review and consideration of feedback received.**

6. Annual Status Review

The OEFC will measure the success of this Multi-Year Plan by checking its progress every 12 months. 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 OEFC's Multi-Year Plan.

7. 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.

8. Progress Report Chart (cumulative as of first date implemented)

January 1, 2015	January 1, 2016	January 1, 2021
<p>General Requirements</p> <ul style="list-style-type: none"> • Accessibility Policy & Multi Year Plan 	<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, conform to accessibility standards 	<p>Information & Communications</p> <ul style="list-style-type: none"> • All external websites and web content will conform to WCAG 2.0 level AA. Content published prior to 2012 will be made available in an accessible format upon request.
<p>Information & Communications</p> <ul style="list-style-type: none"> • Accessible feedback processes in place • Ability to accept TTY phone calls • New public-facing websites conform to WCAG 2.0 Level AA 		
<p>Procurement</p> <ul style="list-style-type: none"> • Accessibility integrated into RFPs 		