

ONTARIO ELECTRICITY FINANCIAL CORPORATION



OEFC ACCESSIBILITY POLICY

Last Updated: December, 2022

OEFC Accessibility Policy

1.0 PURPOSE

This policy describes 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 OEFC does not provide transportation or design public spaces, these two categories are not addressed in this policy.

As OEFC has no employees, designated officers of OEFC are Ontario Financing Authority ("OFA") employees, and 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 employees. As such, 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, OEFC is committed to accessibility for persons with disabilities in performing all its functions.

3.0 POLICY RULES

3.1 Statement of Commitment

OEFC 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 the requirements under Ontario's accessibility laws.

3.2 Compliance with OFA Accessibility Policy

As OEFC has no employees and designated/appointed officers of OEFC are OFA employees, 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 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 components of the Policy as set out in Article 3.0 of the OFA Policy are deemed to be applicable to OEFC.
- The Roles and Responsibilities of OFA employees, contractors and temporary help as set out in Article 5.0 of the OFA Policy shall apply to OFA employees, contractors and temporary help in relation to any work performed on behalf of 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 employees including designated/appointed OEFC officers, who perform work on behalf of 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. 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. 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 OFA employees 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

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, 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. 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.** 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. OFA employees 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.** 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.** 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

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.** OEFC 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 chalkboards, screen reading software, and electronic communication devices.
- b) **Service animals and support persons.** 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, 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, OEFC will be prepared to provide a written explanation.

- a) **Requests for Bids** (“RFBs”) and other related procurements such as Requests for Services (“RFS”) will require vendors to demonstrate that they are inclusive and accessible as an employer and as a provider of goods and/or services.
- b) 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

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 the OEFC 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 weeks' time**. **OEFC will take all reasonable measures to rectify the situation regarding any complaint received. OEFC will consult with persons with disabilities through the review and consideration of feedback received.**

6. Annual Status Review

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 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 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 | | | |

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|--|--|--|---|--|
| | | | Training <ul style="list-style-type: none">• Email communication released in August 2016 to Managers and Employees on the 6 accessibility courses on LearnOn | |
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9. 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 |