

# Ontario Power Generation Standard

## TITLE

**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT - INTEGRATED ACCESSIBILITY & CUSTOMER SERVICE STANDARD**

## AUTHORIZATION

SINGLE POINT OF CONTACT:      Manager, Equity, Diversity & Inclusion  
Ethics & Equity

DOCUMENT OWNER:                Senior Vice President Law & General Counsel and  
Chief Ethics Officer

## DOCUMENT RELATIONSHIP

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## PURPOSE

The purpose of the Accessibility for Ontarians with Disabilities Act (AODA) is to develop, implement, and enforce accessibility standards in order to achieve accessibility for Ontarians with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises on or before January 1, 2025.

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### EXCEPTIONS

None

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## 1.0 DIRECTION

Ontario Power Generation (OPG) is committed to treating all people in a way that allows them to maintain their dignity and independence. OPG believes in integration and equal opportunity. OPG is 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 standard shall be implemented in accordance with the time frames established by the Regulation.

This standard is available in accessible format upon request.

## 2.0 INTEGRATED ACCESSIBILITY STANDARD

### 2.1 Multi Year Accessibility Plan

OPG shall develop, maintain, and document a Multi Year Accessibility Plan outlining the company's strategy to prevent and remove barriers from its workplace and to improve opportunities for persons with disabilities.

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

### 2.2 Self-Service Kiosks

OPG shall consider accessibility when designing, procuring or acquiring our self-serve kiosks to better serve persons with disabilities.

### 2.3 Training Employees and Volunteers

OPG shall ensure that training is provided on the requirements of the accessibility 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 OPG's policies; and,
- all other persons who provide goods, services or facilities on behalf of the company.

The training shall be appropriate to the duties of the employees, volunteers and other persons.

Employees shall be trained when changes are made to the accessibility policy. New employees should be trained within three months of their first day.

OPG shall keep a record of the training it provides.

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## 2.4 Questions About This Standard

Questions about this Standard may be addressed to Ontario Power Generation, Ethics & Equity Office, 1600 Stellar Ave, Unit 1, Whitby, Ontario, L1N 9B2.

## 2.5 Modifications to This Standard or Other Policies

OPG is committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes shall be made to this standard or other governing policy without considering the impact on people with disabilities.

Any policy of OPG that does not respect and promote the dignity and independence of people with disabilities shall be modified or removed in accordance with OPG's governance review process.

## 2.6 Information and Communications Standards

### 2.6.1 Feedback

OPG shall 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. As well feedback regarding OPG's provision of services to people with disabilities may be made:

- (a) In person directly to the service provider at the time service is provided.
- (b) By visiting <http://www.opg.com/Pages/contact.aspx>.
- (c) By e-mailing [AODA@opg.com](mailto:AODA@opg.com).
- (d) By telephoning 416-592-3700 or toll free at 1-855-592-3700.
- (e) In writing to Ontario Power Generation, Ethics & Equity Office, 1600 Stellar Ave, Unit 1, Whitby, Ontario, L1N 9B2.

All feedback should be directed to the Ethics & Equity Office. A member of the Ethics & Equity Office shall disposition the feedback in consultation with the Manager, Equity, Diversity & Inclusion. Members of the public and other Third Parties may expect a response to their feedback within ten business days.

### 2.6.2 Accessible Formats and Communication Supports

Upon request, OPG shall provide, or shall 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.

OPG shall consult with the person making the request in determining the suitability of an accessible format or communication support.

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OPG shall also notify the public about the availability of accessible formats and communication supports.

### 2.6.3 Accessible Websites and Web Content

OPG shall 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.

## 2.7 Employment Standards

### 2.7.1 Recruitment

OPG shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process.

### 2.7.2 Recruitment, Assessment or Selection Process

OPG shall notify job applicants, when they are individually selected to participate further in an assessment or selection process that accommodation is available upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, OPG 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.

### 2.7.3 Notice to Successful Applicants

When making offers of employment, OPG shall notify the successful applicant of its policies for accommodating employees with disabilities.

### 2.7.4 Informing Employees of Supports

OPG shall 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 should be provided to new employees as soon as practicable after commencing employment.

### 2.7.5 Accessible Formats and Communication Supports for Employees

Upon the request of an employee with a disability, OPG shall 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, OPG shall consult with the employee making the request.

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### 2.7.6 Workplace Emergency Response Information

OPG 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 OPG is aware of the need for accommodation due to the employee's disability. OPG shall provide this information as soon as practicable after becoming aware of the need for accommodation.

Where the employee requires assistance, OPG shall, with the consent of the employee, provide the workplace emergency response information to the person designated by OPG to provide assistance to the employee.

OPG shall 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.

### 2.7.7 Documented Individual Accommodation Plans

OPG shall 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 shall also be included in individual accommodation plans.

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

### 2.7.8 Return to Work Process

OPG 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 OPG shall take to facilitate the return to work and shall include documented individual accommodation plans as part of the process.

This return to work process shall not replace or override any other return to work process created by or under any other statute.

### 2.7.9 Performance Management, Career Development and Advancement & Redeployment

OPG shall 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.

## 3.0 CUSTOMER SERVICE STANDARD FOR PERSONS WITH DISABILITIES

OPG is committed to providing its services in a way that respects the dignity and independence of people with disabilities. OPG is also committed to giving people with disabilities the same opportunity to access its services and allowing them to benefit from the



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same services, in the same place, and in a similar way as other members of the public and Third Parties unless an alternate measure is necessary. Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

### 3.1 Providing Services to People with Disabilities

OPG is committed to serving all members of the public and Third Parties including people with disabilities and shall carry out its functions and responsibilities in the following areas:

#### 3.1.1 Communication

OPG shall communicate with people with disabilities in ways that take into account their disability.

OPG shall provide training on how to interact and communicate with people with various types of disabilities to all employees who deal with the public or other Third Parties on OPG's behalf, and all those who are involved in the development and approvals of policies, practices, and procedures on providing services to members of the public and other Third Parties.

#### 3.1.2 Telephone Services

OPG is committed to providing fully accessible telephone service to members of the public and other Third Parties. OPG shall train staff to communicate with members of the public and other Third Parties over the telephone in clear and plain language and to speak clearly and slowly.

OPG shall offer to communicate with members of the public and other Third Parties by alternate means if telephone communication is not suitable to their communication needs or is not available.

#### 3.1.3 Assistive Devices

OPG is committed to serving people with disabilities who use assistive devices to obtain, use, or benefit from its services. OPG shall ensure that their staff are trained and familiar with various assistive devices that may be used by members of the public or other Third Parties with disabilities while accessing OPG's services. People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

#### 3.1.4 Billing

OPG is committed to providing accessible invoices to customers. Customers requiring invoices in an alternate format should communicate this requirement to OPG together with the different format options accessible to them. OPG shall then provide this customer with the invoices in the agreed upon alternate format.

#### 3.1.5 Use of Service Animals and Support Persons

OPG is committed to welcoming people with disabilities who are accompanied by a service animal on the parts of its premises where OPG provides services that are open to the public

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and other Third Parties unless the animal is otherwise excluded by law from the premises. OPG shall also ensure that all staff and others dealing with the public are properly trained in how to interact with people with disabilities who are accompanied by a service animal.

OPG is committed to welcoming people with disabilities who are accompanied by a support person on the parts of its premises where OPG provides services that are open to the public and other Third Parties. Any person with a disability who is accompanied by a support person shall be allowed to enter OPG's premises where OPG provides services that are open to the public and other Third Parties with his or her support person unless the person is otherwise excluded by law from the premises.

### 3.1.6 Notice of Temporary Disruption

OPG shall provide members of the public and other Third Parties with notice of a planned or unexpected disruption in the OPG facilities or customer services used by people with disabilities. This notice shall include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available.

The notice shall be placed at all public entrances and service counters on OPG's premises that are accessible to the public and other Third Parties as well as on OPG's website.

### 3.2 Training for Staff related to Customer Service Standard

OPG shall provide training to all employees and volunteers, and others who deal with the public or other Third Parties on OPG's behalf, and all those who are involved in the development and approvals of policies, practices, and procedures on providing services to members of the public and other Third Parties.

This training should be provided within three months after staff commence their duties.

Training shall include the following:

- (a) The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard regulations.
- (b) How to interact and communicate with people with various types of disabilities.
- (c) How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- (d) How to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities.
- (e) What to do if a person with a disability is having difficulty in accessing OPG's services.
- (f) OPG's governance relating to the accessibility standards for customer service.

Staff should be trained on governance that affects the way services are provided to people with disabilities. Staff shall also be trained on an ongoing basis when changes are made to this governance.

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## **4.0 ROLES AND ACCOUNTABILITIES**

### **4.1 Directors and Officers**

Directors and officers of OPG are accountable for:

- 4.1.1 Taking all reasonable care to prevent OPG from contravening AODA legislation.
- 4.1.2 Demonstrating commitment by showing an active interest in and recognizing the workplace accommodation efforts of employees and managers.

### **4.2 Manager and Supervisors**

Managers and supervisors are accountable for:

- 4.2.1 Ensuring those employees who identify a disability are accommodated reasonably as outlined in this standard and or any other governing documents (i.e. Collective Agreements).
- 4.2.2 Fostering an environment where all workplace parties are supportive of accommodation efforts.
- 4.2.3 Conducting all aspects of the accommodation process in such a way that dignity is preserved and business needs are met.
- 4.2.4 Completing the initial training on the AODA and any updated training on the AODA if OPG's governance is revised.
- 4.2.5 Ensuring new staff members required to complete AODA training do so within three months of having joined OPG.

### **4.3 Employees**

Employees are accountable for:

- 4.3.1 Identifying their need for accommodation.
- 4.3.2 Co-operating in finding a solution – discussing alternatives to meet their accommodation needs, while taking into account workplace realities.
- 4.3.3 Notifying local and Corporate Public Affairs of any disruption in the OPG facilities or customer services used by people with disabilities such that notice of such disruption can be posted on [opg.com](http://opg.com) and locally at all public entrances and service counters on OPG's premises that are accessible to the public and other Third Parties.
- 4.3.4 Complete required training on AODA as required.
- 4.3.5 Directing feedback regarding OPG's provision of services to people with disabilities requiring action to the Ethics & Equity Office.

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#### 4.4 Ethics & Equity Office

The Ethics & Equity Office is accountable for co-ordinating the AODA compliance plan:

- 4.4.1 Preparing and updating, as required, governance, training materials, reports, and other documentation required by the AODA.
- 4.4.2 Co-ordinating the training required under the AODA.
- 4.4.3 Preparing and disseminating the communications required under the AODA.
- 4.4.4 Filing the Accessibility Report required under the AODA to confirm compliance with the accessibility standards for customer service.
- 4.4.5 Maintaining training records including the dates on which training is provided and the number of individuals to whom it is provided.
- 4.4.6 Producing training records, as required.
- 4.4.7 Arranging to have documentation required under the AODA available in alternate formats.
- 4.4.8 Receiving feedback regarding OPG's provision of services to people with disabilities under the feedback process required under the AODA and dispositioning such feedback in consultation with the Manager, Equity, Diversity & Inclusion.

#### 4.5 Site Human Resources

Site Human Resources are accountable for:

- 4.5.1 Including AODA training materials in new employee orientation materials.
- 4.5.2 Supporting employees, managers and supervisors as required.

#### 4.6 Law Division

Law Division is accountable for staying abreast of AODA legislative developments and informing the Manager, Equity, Diversity and Inclusion of such developments in a timely manner.

#### 4.7 Accounts Receivable

Accounts Receivable is accountable for ensuring that accessible invoices are available to OPG customers upon request, as described in Section 3.1.4 above.

#### 4.8 Supply Chain

Have consideration for accessibility when designing, procuring or acquiring self-serve kiosks to better serve persons with disabilities.

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## 4.9 Corporate Affairs

Corporate Affairs is accountable for:

- 4.9.1 Posting notices of temporary disruption in facilities or services used by people with disabilities on OPG's website, www.opg.com, and locally at all public entrances and service counters on OPG's premises that are accessible to the public and other Third Parties.
- 4.9.2 Providing a feedback process regarding the way OPG provides services to people with disabilities on OPG's website and providing feedback received to the Ethics & Equity Office.
- 4.9.3 Assisting the Ethics & Equity Office to make documentation required under the AODA publicly available, when requested, in alternate formats that take into account a person's disability.

## 5.0 DEFINITIONS AND ACRONYMS

### 5.1 Definitions

**Assistive Device:** Means devices used to assist persons with disabilities in carrying out activities or in accessing the services of persons or organizations. Assistive devices include but are not limited to, wheelchairs, reading machines, recording machines, hearing devices, and devices for grasping.

**Dignity:** Means treating people with disabilities as customers and clients who are as valued and as deserving of effective and full service as any other customer and/or client.

**Disability:** Means:

- (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 co-ordination, 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.
- (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.

**Independence:** Means freedom from control or influence of others, freedom to make your own choices.

**Service Animal:** An animal is a service animal for a person with a disability:

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- (a) If it is readily apparent that the animal is used by the person for reasons relating to his or her disability.
- (b) If the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

**Support Person:** Means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, or medical needs or with access to goods or services.

**Third Party:** Means any person who works for or acts on behalf of another business, organization or the government including, without limitation, consultants, contractors, suppliers, and providers of other business and professional services.

## 5.2 Abbreviations and Acronyms

<b>AODA</b>	Accessibility for Ontarians with Disabilities Act
<b>OPG</b>	Ontario Power Generation

## 6.0 BASES, RECORDS AND REFERENCES

### 6.1 Bases

S.O. 2005, Chapter 11, Accessibility for Ontarians with Disabilities Act, 2005

### 6.2 Records

The following records may be generated by use of this document and shall be registered in appropriate document management system in accordance with the following table.

Record Created	Associated Form or Template Number	QA Record? Y?N	Filing Information/ Retention (AIMS Type/Sub-Type)
Training records	In SAP and TIMS	N	SCI 00545/ 6 years
Accessibility Report	Template under the AODA	N	SCI 00545/ 6 years
Feedback	Received via www.OPG.com	N	SCI 00545/ 6 years

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### 6.3 References

#### 6.3.1 Performance References

OPG-GUID-08500-0001, Guideline for Interacting with People with Disabilities  
OPG-POL-0013, Code of Business Conduct Policy  
World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0

#### 6.3.2 Developmental References

OPG-POL-0033, OPG Business Model

### 7.0 REVISION SUMMARY

This is a **non-intent** revision.

- Revised contact information for feedback processes
- Revised Single Point of contact information