



Accessibility for Ontarians with Disabilities Policy

Policy Level Approval	Board of Directors
Policy Category	Corporate
Policy Number	HR-018
Policy Sponsor	Chief Talent/Human Resources Officer
Cross Reference to other relevant policies / legislation / regulation:	<ul style="list-style-type: none"> • <i>Accessibility for Ontarians with Disabilities Act, 2005</i> • O. Reg. 191/11 Integrated Accessibility Standards • <i>Blind Persons’ Rights Act</i> • <i>Freedom of Information and Protection of Privacy Act</i> • <i>Human Rights Code</i> • <i>Workplace Safety and Insurance Act, 1997</i> • Supply Ontario Recruitment Policy • Supply Ontario Disability Accommodation Policy • Supply Ontario Conflict of Interest Policy and Code of Conduct • Supply Ontario Respectful Workplace Policy • Supply Ontario Occupational Health and Safety Policy
Original Date of Approval	October 24, 2024
Next Scheduled Year of Review	2025
Approved by	Board of Directors

Policy Applies to:

Board Members	Executives	Employees	Secondees	Other
X	X	X	X	X

1. Statement of Commitment

Supply Ontario is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*, its regulations and other applicable accessibility laws.

Supply Ontario is also committed to meeting its current and ongoing obligations under the *Ontario Human Rights Code*. In this regard, Supply Ontario understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* and its accessibility standards do not substitute or limit its obligations under the *Ontario Human Rights Code* or obligations to people with disabilities under any other law.

Supply Ontario is committed to excellence in serving and providing goods, services or facilities to all members of the public including people with disabilities. Finally, Supply Ontario is committed to developing employment practices that advance accessibility for people with disabilities.

In furtherance of these commitments, Supply Ontario has developed this Policy and has implemented its Accessibility Plan.

2. Scope

This Policy describes the measures Supply Ontario shall take to achieve accessibility through meeting requirements under the *Accessibility for Ontarians with Disabilities Act, 2005* and its Integrated Accessibility Standards Regulation (Ontario Regulation 191/11).

This Policy applies to the following individuals depending on the applicable requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* and its Integrated Accessibility Standards Regulation:

- (a) all Supply Ontario employees;
- (b) all Supply Ontario volunteers; and
- (c) all members of Supply Ontario's Board of Directors.

In the event of any inconsistency between this Policy and the requirements of applicable law, the requirements of applicable law will prevail.

If the *Accessibility for Ontarians with Disabilities Act, 2005* and its Integrated Accessibility Standards Regulation and any other legislation conflict, the applicable provision that offers the

highest level of accessibility for people with disabilities with respect to the areas set out in this Policy shall be followed.

3. Definitions and Acronyms

The following words and acronyms shall be used in this Policy and our Accessibility Plan.

“Accessibility Plan” means Supply Ontario’s multi-year accessibility plan which outlines Supply Ontario’s measures to achieve compliance with the requirements of the AODA.

“Accessible Format(s)” means alternate formats for presenting printed, written, audio or visual material that are accessible to persons with disabilities, including, without limitation, Braille, large print, accessible web content, text transcripts of visual and audio information, and other formats usable by persons with disabilities.

“AODA” means the *Accessibility for Ontarians with Disabilities Act, 2005*, including the Integrated Accessibility Standards Regulations.

“Assistive Device” means specialized equipment used by or provided for persons with a disability including but not limited to mobility aids such as wheelchairs, scooters, walkers, canes, crutches, prosthetic devices, hearing aids, cognitive aids such as computer or electrical assistive devices, and computer software and hardware such as voice recognition programs, screen readers and screen enlargement applications and closed captioning.

“Communication Supports” means supports that individuals with disabilities may need to access information. These include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, American Sign Language interpreter services, adaptive technology for a specific need and other supports that facilitate effective communications.

“Disability(ies)” 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; 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*.

“Employee” means a person employed by Supply Ontario and compensated by Supply Ontario as an employee, regardless of whether the employee is full-time or part-time, permanent, or fixed term, represented by a bargaining unit, directly employed or on secondment. Independent contractors and individuals employed by another entity but who provide services for or on behalf of Supply Ontario are not employees.

“FIPPA” means *Freedom of Information and Protection of Privacy Act*, R.S.O. 1990, c.F.31.

“Guide Dog” means a dog as defined in section 1 of the *Blind Persons’ Rights Act*.

“IEAP” means an individual employee accommodation plan.

“IASR” means the Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) under the AODA, which establish various accessibility standards, including standards related to information and communications, employment, transportation, design of public spaces and customer service.

“Mobility Aid” means a device used to facilitate the transport, in a seated posture, of a person with a disability.

“Service Animal” means an animal for a person with a disability if:

- (a) the animal can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal; or
- (b) the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to disability:
 - i A member of the College of Audiologists and Speech-Language Pathologists of Ontario
 - ii A member of the College of Chiropractors of Ontario
 - iii A member of the College of Nurses of Ontario
 - iv A member of the College of Occupational Therapists of Ontario
 - v A member of the College of Optometrists of Ontario
 - vi A member of the College of Physicians and Surgeons of Ontario
 - vii A member of the College of Physiotherapists of Ontario
 - viii A member of the College of Psychologists of Ontario
 - ix A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

“Support Person” means, in relation to a person with a disability, another person who accompanies that person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities provided by Supply Ontario.

“Unconvertible” means

- (a) it is not technically feasible to convert the information or communication, or
- (b) the technology to convert the information or communications is not readily available.

4. Policy

General

Planning and Reporting

Supply Ontario is committed to transparency as it develops and implements its accessibility standards. To this end, Supply Ontario has established and implemented, and shall maintain, document, review and update as required, an Accessibility Plan which outlines a strategy to prevent and remove barriers and meet the organization’s requirements under the AODA. Supply Ontario shall ensure that its Accessibility Plan complies with the requirements of the AODA.

Supply Ontario shall also comply with all accessibility compliance reporting requirements as required under the AODA.

Training

Supply Ontario is committed to providing appropriate training to all employees, members of its Board of Directors and any volunteers that it may retain, in the accessibility standards set out in the AODA and on the Ontario *Human Rights Code* as it pertains to people with disabilities, as per the requirements of the AODA. Supply Ontario shall also require such training for all other persons who provide goods, services or facilities on its behalf.

Supply Ontario shall keep records of such training as required under the AODA.

Procuring or acquiring goods, services and facilities

Supply Ontario shall incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, in accordance with the requirements of the AODA.

Customer Service

Supply Ontario is committed to providing its goods, services or facilities in an accessible manner in accordance with the requirements of the AODA.

Our organization shall use reasonable efforts to ensure that its service to persons with disabilities is consistent with the following principles:

- (a) Our goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities;
- (b) Our provision of goods, services or facilities to persons with disabilities must be integrated with our provision of same to others, unless an alternative measure is necessary (temporarily or permanently) to enable a person with a disability to obtain, use or benefit from the goods, services or facilities;
- (c) Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities; and
- (d) When communicating with a person with a disability, we shall do so in a manner that takes into account the person's disability, as may be appropriate in circumstances.

Supply Ontario shall prepare and make publicly available, the documentation and information that is required by the AODA and, if requested, shall provide it in an accessible format or with communication support, all in accordance with the requirements of the AODA.

Assistive Devices and Mobility Aids

Supply Ontario shall make reasonable efforts to ensure that people with disabilities may use their personal assistive devices and mobility aids when accessing Supply Ontario's goods, services or facilities.

Service Animals, Guide Dogs and Support Persons

Supply Ontario currently does not provide members of the public or other third parties with goods, services or facilities at premises that it owns or operates and to which members of the public or other third parties have access. However, Supply Ontario shall comply with the AODA's customer service standards that apply to such premises if they apply to the organization at a future date.

Information and Communications

Supply Ontario employees shall communicate with all stakeholders in a courteous manner taking into account any accommodating measures that may be required. This means employees shall communicate in a manner that enables all stakeholders to communicate effectively for purposes of requesting, receiving and using Supply Ontario goods, services and facilities.

Feedback Process

Feedback on Supply Ontario's business, processes and services, including the level of accessibility experienced during delivery of goods, services or facilities to customers, and the feedback process itself, are welcomed and appreciated. Because of this, Supply Ontario shall ensure that it has a feedback and complaints process in accordance with the requirements of the AODA.

Accessible Formats and Communication Supports

Supply Ontario shall notify the public about the availability of accessible formats and communication supports, and, if requested, shall provide them in accordance with the requirements of the AODA.

Accessible Website and Web Content

Supply Ontario is committed to ensuring ease of access to its external website and web content, including web-based applications, that Supply Ontario controls as described in the AODA. Supply Ontario shall meet internationally recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements, in accordance with the requirements of the AODA.

Emergency Procedures, Plans or Public Safety Information

Should Supply Ontario prepare emergency procedures, plans or public safety information and make them available to the public, it shall, upon request and as soon as practicable, provide this information in an accessible format or with appropriate communication supports in accordance with the requirements of the AODA.

Employment

Supply Ontario is committed to providing an accessible workplace for its employees and ensuring accessibility for those who apply for employment with the organization.

Recruitment, Assessment or Selection Process

Supply Ontario shall notify its employees and the public that accommodations are available for applicants with disabilities during the recruitment process, it shall 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, and if a selected applicant requests accommodation, Supply Ontario shall consult with the applicant and provide or arrange for suitable accommodation in accordance with the requirements of the AODA.

Notice to Successful Applicants

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

Informing Employees of Supports

Supply Ontario shall inform its employees of its policies to support employees with disabilities including but not limited to its policies on the provision of job accommodations, as soon as practical after they begin employment. Supply Ontario shall also provide updated information to employees whenever there is a change to these policies.

Accessible Formats and Communication Supports for Employees

When an employee with a disability so requests it, Supply Ontario shall provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform the employee's job, and information that is generally available to employees in the workplace, in accordance with the requirements of the AODA.

Workplace Emergency Response Information

Supply Ontario shall provide individualized workplace emergency response information to employees with a disability and implement related measures, in accordance with the requirements of the AODA. Supply Ontario shall review this information and measures when the employee moves to a different location in the organization, when the employee's overall accommodations needs or plans are reviewed, and when Supply Ontario reviews its general emergency response policies.

Individual Employee Accommodation Plans

Supply Ontario shall develop and have in place a written process to develop IEAPs for employees with disabilities. The process for the development of IEAPs shall include the elements set out in the AODA, and IEAPs shall satisfy the requirements set out in the AODA.

Return to Work Process

Supply Ontario shall develop and maintain 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 to return-to-work, in accordance with the requirements of the AODA. Supply Ontario understands that the return-to-work process outlined under the AODA does not replace or override any other return-to-work process created by or under any other statute.

Performance Management and Career Development

Supply Ontario's performance management, career development, advancement and redeployment processes shall take into account the accessibility needs of employees with disabilities as well as IEAPs, when they are used in respect of such employees.

Design of Public Spaces (Accessibility Standards for the Built Environment)

Supply Ontario is not currently subject to these accessibility standards. However, Supply Ontario shall comply with these requirements if they apply to the organization in the future.

5. Roles and Responsibilities

Board of Directors

- Review and approve this Policy on an annual basis.

Chief Executive Officer

- Ensure overall compliance with the AODA, as well as all orders issued by inspectors or directors appointed under the AODA.
- Oversee establishment of appropriate organization structures, systems, procedures, processes and controls, including employee training, to ensure compliance with this Policy.
- Take appropriate action for any non-compliance with this Policy.

Senior Leadership Team

- Take all reasonable care to prevent Supply Ontario from contravening the AODA.
- Demonstrate commitment by showing an active interest in and recognizing the workplace accommodation efforts of employees and people managers.

Communications and Stakeholder Relations

- Develop and implement policies, procedures and documentation with respect to the provision of Supply Ontario's goods, services or facilities to persons with disabilities, which comply with the AODA.
- In conjunction with Information Technology, ensure Supply Ontario's website(s), web content and web-based applications meet the requirements set out in the AODA.
- Make information publicly available as required by the AODA, and, if requested, available in alternate formats or with communication supports that consider a person's disability.
- Support Human Resources and other Supply Ontario stakeholders with their accountabilities under this Policy.
- Receive and address feedback regarding Supply Ontario's business, including its provision of goods, services and facilities to people with disabilities, as per the requirements of the AODA.

- Ensure all of its accessibility measures comply with the AODA.

Human Resources

Compliance

- Lead the regular review of this Policy and the Accessibility Plan, and as new or revised accessibility standards or requirements emerge.
- Review and approve substantive amendments to this Policy and the Accessibility Plan as required.
- Address complaints and orders under the AODA and manage the compliance process.
- Prepare and file all accessibility and compliance reports as required under the AODA.
- Work with Communications and Stakeholder Relations to prepare and disseminate communications required under the AODA.

Recruitment and Selection

- Develop and implement notifications, information and processes in a manner that is compliant with the AODA.

Employment Accommodations

- Develop and implement notifications, information and processes in a manner that is compliant with the AODA.

Training

- Prepare, implement and update, as required, training required by the AODA.
- Maintain and produce training records required under the AODA.

Feedback

- Receive and address feedback received in the feedback process required under the AODA in consultation with Communications and Stakeholder Relations.

Information Technology

- Ensure compliance with the AODA is embedded in technology governance requirements.
- Ensure that both internal technology applications and public-facing products that are built or procured are accessible as per the requirements of the AODA.
- Support Human Resources and other Supply Ontario stakeholders with their accountabilities under this Policy.

Facilities

- Implement accessibility requirements as required under the AODA.
- Receive and address feedback received in the feedback process required under the AODA in consultation with Communications and Stakeholder Relations.

Legal Services

- Provide legal support to Human Resources on AODA compliance matters.

Business Units

- Review and, as required, revise business unit policies, procedures, processes and best practices to ensure alignment and compliance with this Policy.
- Receive and address feedback received in the feedback process required under the AODA in consultation with Communications and Stakeholder Relations.

Corporate Procurement

- Develop and incorporate accessibility design, criteria and features when procuring or acquiring goods, services or facilities, in accordance with AODA requirements.
- Ensure procurement bid documentation and vendor contracts promote and satisfy accessibility standards required by the AODA.

People Managers

- Foster an environment where all workplace parties are supportive of accommodation and accessibility efforts.
- Conduct all aspects of the accommodation process in such a way that dignity is preserved, and business needs are met.
- In collaboration with Human Resources, ensure employees who identify a disability are accommodated reasonably as outlined in this Policy or any other governing documents, and as required by law.
- Ensure that employees undertake reviews and training required by the AODA as directed.

Employees

- Read, understand and comply with this Policy.
- Identify their need for accommodation to their people manager.
- Complete required AODA reviews and training as directed.
- Provide assistance to an employee with a disability during an emergency, where designated.
- Notify applicable business unit in the event of any disruption in Supply Ontario facilities, customer services or communications used by people with disabilities.

6. Review

This Policy shall be reviewed annually after the effective date or as new or revised accessibility standards or requirements emerge.

Changes to Existing Policies

Any policies that require amendment in order to enhance compliance with the AODA, shall be modified or removed if not required.

Change History

Revision Number	Date of Approval	Description of Change