

Policy on Accessibility for Ontarians with Disabilities Act (AODA) and Customer Service Standards and Integrated Accessibility Standards Regulation (IASR)

1. Objective & Scope

This Policy is to provide guidance to Royal College employees regarding how to identify, remove and prevent barriers and how to increase accessibility for persons with disabilities. This Policy establishes the framework for the Royal College's commitment to accessibility, requirements of the *Accessibility for Ontarians with Disabilities Act, 2005* ("AODA") and governs how Royal College services are provided with respect to the *Integrated Accessibility Standards Ontario Regulation 191/11* (the "Regulation"), as it pertains to persons with disabilities.

2. Application

This Policy applies to all employees, contractors, and volunteers of the Royal College, Royal College Canada International ("RCI") and the Royal College Foundation (collectively referred to as the "Royal College") who are conducting work on behalf of the Royal College.

This Policy is meant to replace and supersede the Royal College's 2016 AODA Customer Service Standards Policy.

3. Statement of Commitment

The Royal College is committed to treating all individuals in a way that allows them to maintain their dignity and independence. The Royal College believes in integration, equal opportunity, access, and participation for people with disabilities and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by preventing and removing barriers to accessibility and ensuring compliance with Ontario's accessibility laws.

The Royal College's Accessibility Policy and Multi-Year Accessibility Plan will be reviewed and updated at least once every five (5) years. It will show our organization's commitment to removing barriers and preventing new ones. We will make it available to the public via our Royal College website and provide it in an alternative accessible format, upon request.

4. Definitions & Acronyms

Accessible Formats: as defined by the Regulation, “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.

Barrier: as defined by the Act, as a “barrier” meaning anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy, or practice.

Communication Supports: as defined by the Regulation “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 communications.

Customer: Customer is the term used in the AODA legislation to describe patrons, stakeholders, or anyone else in Ontario in receipt of goods, services or facilities from the Royal College. The primary recipients of Royal College services are the Royal College Fellows, affiliates, examination candidates, and any other individuals or organizations, such as members of the public, and members of the broader community, who may be entitled to certain Royal College services.

Disability: as defined in the Act, is:

- 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;
- a condition of mental impairment or a developmental disability.
- a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
- a mental disorder, or
- an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

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

Service Animal: as defined by the Regulation, an animal is a service animal for a person with a disability if:

- the animal is easily identifiable as one that is being used by the person for reasons related to their disability (e.g., it is a guide dog or other animal wearing a vest or harness);
- The individual can provide documentation from a regulated health professional confirming the animal is required due to a disability.

5. Policy

5.1 CUSTOMER SERVICE

The Royal College is committed to providing and maintaining an accessible environment for persons with disabilities in the delivery of our goods and services to people with disabilities and we will carry out these functions and responsibilities in the following areas:

I. Providing Goods and Services to persons with disabilities

- **Assistive devices:** The Royal College is committed to serving persons who use assistive devices to obtain, use or benefit from our services.
- **Communication:** The Royal College will communicate with people with disabilities in ways that consider the needs of the persons with their disabilities. Upon request the Royal College will provide or arrange for accessible formats and communication supports for persons with disabilities and train employees who communicate with customers on how to interact and communicate with people with various types of disabilities.
- **Invoicing:** We are committed to providing accessible invoices to all our customers. For this reason, invoices will be provided in the following formats upon request: (hard copy, large print, e-mail, etc.). We will answer any questions customers may have about the content of the invoice in person, by telephone or e-mail.
- **Telephone Services:** The Royal College is committed to providing fully accessible telephone service to our customers. We will train employees to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly. We will offer to communicate with customers by email, relay services or in person if telephone communication is not suitable to their communication needs or is not available.

II. Service Animals and Support Persons: The Royal College will welcome all persons with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties. In situations where a service animal is excluded by law, the Royal College will work with the individual requiring the service to make alternate arrangements. We will also ensure that all staff, volunteers, and others dealing with the public are properly trained in how to interact with persons with disabilities who are accompanied by a service animal.

At no time will a person with a disability who is accompanied by a support person be prevented from having access to his or her support person while on the Royal College premises. The Royal College may require a person with disabilities to be accompanied by a support person but only if, after consulting the person with a disability to understand their needs, the Royal College determines the support person is necessary to protect the health and safety of the person or others on the premises.

III. Notice of Temporary Disruption: The Royal College will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, the anticipated duration, and a description of alternative facilities or services, if available. The notices will be posted accordingly at all public entrances and service counters of the Royal College or by such methods that are reasonable in the circumstance (e.g., via the Royal College website).

- IV. **Feedback process:** The goal of the Royal College is to meet and surpass customer expectations while serving customers with disabilities. Comments regarding how well our customer expectations, accessibility needs, and accommodation requests are being met are welcome and appreciated. Feedback can be provided through various methods, including in person, by telephone, TTY message relay service and email. Any feedback or comments should be directed to:

Mail/in person:

Royal College of Physicians and Surgeons of Canada 774 Echo Drive, Ottawa, ON K1S 5N8

Telephone: 613-730-8177; toll free 1-800-668-3740

Fax: 613-730-8830

E-mail: feedback@royalcollege.ca

Customers can expect a response to feedback or a complaint within 3 business days, by email, letter, or telephone.

- V. **Training:** The Royal College will ensure that training is provided on the requirements of the accessibility standards referred to in the Regulation and continue to provide training on the Human Rights Code as it pertains to people with disabilities, to:

- all its employees and volunteers.
- all persons who participate in developing the Royal College's policies; and,
- all other persons who provide goods, services, or facilities on behalf of the Royal College

Training will include the following:

- The purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standard and the Integrated Accessibility Standard.
- How to interact and communicate with people with various types of disabilities.
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person.
- What to do if a person with a disability is having difficulty in accessing the Royal College's goods, services, or facilities; and
- Royal College's policies, practices and procedures relating to the customer service standard.

The training will be appropriate to the duties of the employees, volunteers, and other persons. Employees will be trained when changes are made to the accessibility policy. New employees will be trained as part of the onboarding program and the Royal College will keep a record of the training it provides.

5.2 INFORMATION and COMMUNICATION

- I. **Feedback:** The Royal College will ensure that its process for receiving and responding to feedback and complaints is accessible to anyone, including people with disabilities, by providing, or arranging for the provision of, accessible formats and communications supports, upon request.

- II. **Accessible Formats and Communication Supports:** Upon request, the Royal College will provide, or will arrange for the provision of accessible formats and communication supports for anyone, including people with disabilities, in a timely manner that considers the person's accessibility needs due to disability (e.g., HTML and Microsoft Word, large print, text transcripts of visual and audio information). The Royal College will consult with the person making the request in determining the suitability of an accessible format or communication support and will also notify its employees and the public about the availability of accessible formats and communication supports.
- III. **Accessible Websites and Web Content:** The Royal College will 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. Where it is impracticable the Royal College will provide an explanation upon request.
- IV. **Emergency Procedure, Plans and Public Safety:** Where emergency procedures, plans or public safety information is available to the public, the Royal College will provide the information in an accessible format or with appropriate communication supports upon request.

5.3 EMPLOYMENT STANDARDS

- I. **Recruitment, Assessment or Selection Process:** The Royal College will 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. If a selected applicant requests an accommodation, the Royal College 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.
- II. **Notice to Successful Applicants:** When making offers of employment, the Royal College will notify the successful applicant of its policies for accommodating employees with disabilities.
- III. **Informing Employees of Supports:** The Royal College will 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 consider an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practicable after commencing employment.
- IV. **Accessible Formats and Communication Supports for Employees:** Upon the request of an employee with a disability, the Royal College will 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, the Royal College will consult with the employee making the request.
- V. **Workplace Emergency Response Information:** Where the Royal College is aware that an employee has a disability and that there is a need for accommodation, an individualized

emergency response plan will be provided to the employee as soon as practicable. Information/plan will vary based on the nature of the employee's disability and their requirements.

- VI. **Documented Individual Accommodation Plans:** The Royal College will 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 will also be included in individual accommodation plans. In addition, the plans will include individualized workplace emergency response information (where required) and will identify any other accommodation that is to be provided. The Process for the development of documented individual accommodation plans can be found as Schedule "A" to this Policy.
- VII. **Return to Work Process:** The Royal College 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 the Royal College will take to facilitate the return to work and will include documented individual accommodation plans as part of the process. This return-to-work process will not replace or override any other return to work process created by or under any other statute (i.e., the Workplace Safety Insurance Act, 1997).
- VIII. **Performance Management, Career Development and Advancement & Redeployment:** The Royal College will consider 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.

5.4 DESIGN OF PUBLIC SPACES

The Royal College will incorporate accessibility requirements under the regulation when building or redeveloping temporary and/or modifying existing interior and exterior public space identified under Accessibility Standard for the Design of Public Spaces.

5. References

- *Accessibility for Ontarians with Disabilities Act*, 2005, S.O. 2005, c.11 at <https://www.ontario.ca/laws/statute/05a11>
- *Integrated Accessibility Standards*, O.Reg. 191/11, at <https://www.ontario.ca/laws/regulation/110191#BK148>
- *Ontario Human Rights Code*, R.S.O. 1990, c. H.19, at <https://www.ontario.ca/laws/statute/90h19>
- *Early Safe Return to Work Policy*
- *Employee Orientation Policy*
- *Individual Accommodation Policy*

- *Digital Content Policy*

6. Contact(s)

For information or clarification, please contact:

Office of the CEO-Legal Unit
The Royal College of Physicians and Surgeons of Canada
774 Echo Drive
Ottawa, ON, K1S 5N8
613-730-2571

7. Conclusion

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