

Multi-year Accessibility Plan and Policy

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HOOPP
Healthcare of Ontario
Pension Plan

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1. Purpose

Pursuant to the Accessibility for Ontarians with Disabilities Act (“AODA”), various organizations in Ontario, including HOOPP, are working to address barriers experienced by persons with a disability.

As required under AODA’s Regulation Integrated Accessibility Standards (O. Reg. 191/11) (the “Regulation”), this accessibility plan outlines the policies and actions that HOOPP will put in place to achieve and maintain accessibility and provide involvement for people with disabilities. Please see Appendix A for a summary of the key dates for compliance with the requirements of the Regulation.

2. Statement of Commitment, General Requirements and Training

2.1 Statement of Commitment

HOOPP is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so, to the extent possible, by preventing and removing barriers to accessibility and meeting accessibility requirements under AODA.

2.2 General Requirements

In accordance with AODA and its Regulation, HOOPP will:

- File an accessibility report on every three years at the Accessibility Directorate of Ontario (www.AccessON.ca).
- Make this policy and plan available on HOOPP’s website (www.hoopp.com) and, upon request, provide this policy in an accessible format.
- Review and update this plan at least once every five years.

2.3 Training

HOOPP will provide training to employees and contractors (“HOOPP staff members”) on the accessibility standards under the Regulation and Ontario’s *Human Rights Code* as it relates to people with disabilities. Training will be provided in a way that is appropriate to the duties of HOOPP staff members.

HOOPP will continue to take the following steps to ensure HOOPP staff members are provided with the training needed to meet Ontario’s accessibility laws:

- Training will be provided to HOOPP staff members as soon as practicable after hiring.
- Staff members will also be trained on an ongoing basis when changes are made to this policy and plan.
- HOOPP will keep records of the training provided, including the dates on which the training is provided and the number of individuals to whom the training is provided.

Please see also Section 5.2 of this policy for HOOPP’s training policies as they relate to the “Customer Service Standards”.

3. Information and Communications Standards

3.1 HOOPP's Public Websites

HOOPP is committed to meeting the communication needs of people with disabilities. To the extent it is practicable, HOOPP will ensure:

- i. by January 1, 2014, all new internet websites and web content will conform with WCAG 2.0, Level A, for web content published after January 1, 2012, and
- ii. by January 1, 2021, all internet website content will conform with WCAG 2.0, Level AA.

To determine if meeting the WCAG 2.0 Level A or AA requirements is practicable, HOOPP may consider the following factors, among other things:

- the availability of commercial software or tools or both; and,
- if meeting these requirements would have a significant impact on an implementation timeline that is planned or initiated before January 1, 2012.

The WCAG 2.0 Levels A and AA standards apply only to HOOPP's internet websites, such as www.hoopp.com. This standard does not apply to: (i) HOOPP's extranet websites, such as HOOPP's member portal, HOOPP's employer portal, or the Board of Trustee's extranet site, or (ii) HOOPP's intranet site.

3.2 Feedback Process

HOOPP will ensure existing processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request.

Examples of "accessible formats" include:

- large print;
- recorded audio and electronic formats; and
- Braille

Examples of "communication supports" include:

- captioning;
- alternative and augmentative communication supports;
- plain language; and
- sign language.

HOOPP will post on www.hoopp.com about the availability of accessible formats and communication supports in respect of HOOPP's feedback process.

To meet these obligations, HOOPP will continue to review its existing feedback processes and the availability of accessible documents, and update or revise them, as appropriate.

3.3 Accessible Formats and Communication Supports

HOOPP will, upon request, provide or 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;
- in consultation with the person making the request in determining the suitability of an accessible format or communication support; and,
- at a cost that is no more than the regular cost charged to other persons.

HOOPP will post on www.hoopp.com about the availability of accessible formats and communication supports.

To ensure accessible formats and communications supports are available upon request, HOOPP will continue to review its communication practices and procedures and update and revise them, as appropriate.

4. Employment Standards

To meet each of the employment standards required under the Regulation, as set out below, HOOPP will review its employment policies, practices and procedures and make appropriate changes, if any, by the required delivery dates.

4.1 Workplace Emergency Response Information

If HOOPP is aware of the need to accommodate due to an employee's disability, HOOPP will provide such employee with individualized workplace emergency response information, if necessary. HOOPP will provide such individualized information as soon as practicable after HOOPP becomes aware of the need for accommodation.

As required under the Regulation, HOOPP will review the individualized workplace emergency response information when:

- the employee's work site moves to a different location in the organization;
- the employee's overall accommodation needs or plans are reviewed; and
- HOOPP reviews its general emergency response policies.

4.2 Recruitment

HOOPP will continue to notify its employees and post on www.hoopp.com about the availability of accommodation for job applicants with disabilities in its recruitment process. Specifically, HOOPP will implement the following practices as required under the Regulation:

- during recruitment, notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes used in the job;
- consult with the job 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 if the selected applicant requests an accommodation; and

- when making offers of employment, notify the successful applicant of HOOPP’s policies for accommodating employees with disabilities.

4.3 Information for Employees

HOOPP will continue to inform its employees of HOOPP’s policies that support those employees with disabilities, including HOOPP’s policy on the provision of job accommodations that take into account an employee’s accessibility needs due to a disability. HOOPP will provide this information:

- to new employees as soon as practicable after they begin their employment; and,
- whenever there is a change to these policies.

4.4 Accessible Workplace Information for Employees with Disabilities

If requested by an employee with a disability, HOOPP provides the employee with information that is: (i) required to perform that employee’s job; and (ii) generally available to HOOPP employees in the workplace, in an accessible format and/or with communication supports. HOOPP will consult with the employee to determine the suitability of an accessible format or communication support.

4.5 Accommodation Plans for Employees with Disabilities

HOOPP will continue to develop, document and implement individual accommodation plans for employees with disabilities. The process addresses the following:

1. The way an employee requesting accommodation may participate in the development of the individual accommodation plan.
2. The way the employee is assessed on an individual basis.
3. HOOPP’s right to request an evaluation by an outside medical or other expert, at HOOPP’s expense, to assist HOOPP in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. In the development of the accommodation plan, an employee’s right to request the participation of a representative from: (i) HOOPP Employees Association, if in the bargaining unit, or (ii) the workplace, if not in the bargaining unit.
5. The steps HOOPP will take to protect the privacy of the employee’s personal information.
6. The frequency individual accommodation plans will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, how HOOPP will provide the reasons for the denial to the employee.
8. How HOOPP will communicate the individual accommodation plan in a format that takes into account the employee’s accessibility needs.

Every individual accommodation plan must:

- if requested, include the information set out under “Accessible Workplace Information for Employees with Disabilities” as above;
- include individualized workplace emergency response information, if required;
- identify any other accommodation HOOPP is to provide; and

- be in writing.

4.6 Return to Work Process

HOOPP will continue to develop, document and implement a return to work process for those employees who have been absent from work due to a disability and who require a disability-related work accommodation.

The return to work process:

- outlines the steps HOOPP will take to facilitate the return to work of employees who have been absent due to a disability; and
- includes documented individual accommodation plans, as described above.

4.7 Performance Management, Career Development and Reassignment

For those employees with a disability, HOOPP will continue to take into account the employee's accessibility needs and their accommodation plan when the employee is undergoing any of HOOPP's processes relating to performance management, career development or reassignment of roles.

5. Customer Service Standards

Standards for customer service (the "Customer Service Standards") are set out in Part IV.2 of the Regulation. The purpose of the Customer Service Standards is to ensure goods and services are equally accessible to every member of the public, where possible.

In our function as administrator of HOOPP, we provide services to HOOPP members, pensioners, employers, and other stakeholders ("HOOPP stakeholders").

HOOPP strives at all times to provide its services in a way that respects the dignity and independence of HOOPP stakeholders with disabilities. We are also committed to giving HOOPP stakeholders with disabilities an opportunity to access, and allow them to benefit from, HOOPP services, in the same place and in a similar way as others.

5.1 Providing services to HOOPP stakeholders with disabilities

HOOPP is committed to delivering a high standard of service. Our commitment to this standard applies to the delivery of service to HOOPP stakeholders with disabilities. Specifically, in providing our services, we will use reasonable efforts to ensure our practices are consistent with this commitment in respect of the following:

1. Communication

- We will communicate with HOOPP stakeholders with disabilities in ways that take into account their disability.
- We will train staff who communicate with HOOPP stakeholders on how to interact and communicate with people with various types of disabilities.
- Upon request, we will provide a copy of this policy in a format that takes into account a person's disability.

2. Assistive devices

- We are committed to providing high-quality service to HOOPP stakeholders with disabilities who use assistive devices to obtain, use or benefit from our services. Examples of assistive devices include: wheelchairs, screen readers, listening devices or canes.
- Staff will receive training on various assistive devices that may be used by HOOPP stakeholders with disabilities while accessing our services.

3. Use of service animals

- HOOPP stakeholders with disabilities who are accompanied by a guide dog or other service animal are permitted to enter those parts of our premises that are open to HOOPP stakeholders and to keep the service animal with them.
- Staff will receive training on how to interact with people with disabilities who are accompanied by a service animal.
- A service animal is an animal for a person with a disability (i) if it is readily identified that the animal is used by the person for reasons relating to her or his disability as a result of visual indicators such as the vest or harness worn by the animal; or, (ii) if the person provides documentation from an Ontario health professional confirming that the person requires the animal for reasons relating to the disability.

4. Use of support persons

- HOOPP stakeholders with disabilities who are accompanied by a support person are also welcome on our premises.
- A HOOPP stakeholder with a disability who is accompanied by a support person will not be prevented from having access to her or his support person while on our premises.
- HOOPP may decide to require a HOOPP stakeholder with a disability to be accompanied by a support person when on the premises, if HOOPP: (i) consults the person with a disability, (ii) determines a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises, and (iii) determines there is no other reasonable way to protect the health or safety of the person or others on the premises.
- Staff will receive training on how to interact with people with a disability who are accompanied by a support person.
- A support person is another person who accompanies a person with a disability to help her or him with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

5. Notice of temporary disruptions

- HOOPP will provide notice if there is a planned or unexpected disruption in the facilities or services usually used by HOOPP stakeholders with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if any, that are available.
- HOOPP will prepare a document setting out the steps that HOOPP will take in connection with a temporary disruption and, on request, provide a copy of the document to any person. HOOPP will notify persons that this document is available for review on the person's request.

- These notices will be placed in our reception area or on our website at hoopp.com as is appropriate in the circumstances.

5.2 Training for staff

HOOPP will provide training to all staff on these Customer Service Standards.

1. Content of training

Training will include:

- A review of the purpose of the Act and requirements of the Customer Service Standards
- A review of the policy
- How to interact and communicate with persons with various types of disabilities
- How to interact with persons with a disability who use an assistive device or require the assistance of a guide dog, service animal or support person
- How to use equipment or devices available at HOOPP's premises that may help with the provision of our facilities or services to a person with a disability
- What to do if a HOOPP stakeholder with a disability is having difficulty accessing our facilities or services

2. Timing of training

Training will be provided as soon as practicable to HOOPP staff.

Staff will also be trained on an ongoing basis when changes are made to these policies, practices and procedures.

3. Documenting training

HOOPP will keep records of the training provided, including a summary of the contents of the training, the dates on which the training is provided and the number of individuals to whom the training is provided.

HOOPP will prepare a document that describes its training policy, summarizes the content of the training, and specifies when the training will be provided.

5.3 Feedback process

1. Receiving feedback

HOOPP welcomes and appreciates feedback on this policy and its implementation. Feedback can be provided to HOOPP in the following ways:

In person at our office:	1 Toronto St., Suite 1400 Toronto, ON
By telephone to Client Services:	416-646-6445 or 1-877-43HOOPP (46677)
In writing:	1 Toronto St., Suite 1400

Toronto, ON
M5C 3B2
Attention: Client Services

Email (or by disk): clientservices@hoopp.com

2. Responding to feedback

HOOPP has a feedback process that enables us to receive and respond to comments, including complaints.

3. Documenting feedback process

HOOPP will:

- Ensure that the feedback process is accessible to persons with disabilities by making accessible formats and communication available, upon request
- Make information about the feedback process available to the public on HOOPP's website
- Prepare a document describing the feedback process and notify HOOPP stakeholders that a copy of this document is available for review on their request and provide it whenever requested

5.4 Format of documents

If HOOPP is requested to provide a copy of any document relating to its policies or practices on the Customer Service Standards, HOOPP will make the document or the information contained in the document, to the person in an accessible format or with communication support in a timely manner taking into account the person's accessibility needs due to disability.

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

5.5 Availability of Documents

This policy, and supporting documents reference in this policy, will be made available to any person who requests it. HOOPP will post this policy on our website.

6. For more information

For more information on this accessibility plan and policy, please contact HOOPP's Client Services at:

- Phone: 416-646-6445 or 1-877-43HOOPP (46677) (Canada and U.S.)
- Email: clientservices@hoopp.com

Other formats of this document, which may be more accessible to individuals with a disability, are available free upon request.

Appendix A: Summary of the compliance dates under the Regulation

General Requirements and Training

January 1, 2014	<p>General Requirements</p> <ul style="list-style-type: none"> • HOOPP to file an accessibility report on an annual basis • HOOPP to make this policy and plan available on HOOPP’s website (www.hoopp.com) and, upon request, provide this policy in a more accessible format for a person with a disability • HOOPP to review and update this plan at least once every five years
January 1, 2015	<p>Training</p> <ul style="list-style-type: none"> • HOOPP to provide training on the requirements under the Regulation and Ontario’s Human Rights Code as it relates to people with disabilities

Information and Communications Standards

January 1, 2014	<p>HOOPP’s Public Websites</p> <ul style="list-style-type: none"> • All new websites and web content must conform with WCAG 2.0, Level A, for web content published after January 1, 2012
January 1, 2021	<ul style="list-style-type: none"> • All website content must conform with WCAG 2.0, Level AA
January 1, 2015	<p>Feedback Process</p> <ul style="list-style-type: none"> • Feedback processes must be accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request • HOOPP to notify the public about the availability of accessible formats and communication supports in respect of HOOPP’s feedback process
January 1, 2016	<p>Accessible Formats and Communication Supports</p> <ul style="list-style-type: none"> • HOOPP to, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities • HOOPP to notify the public about the availability of accessible formats and communication supports

Employment Standards

January 1, 2012	<p>Workplace Emergency Response Information</p> <ul style="list-style-type: none"> • HOOPP to provide employees with disabilities with individualized workplace emergency response information, if necessary
January 1, 2016	<p>Recruitment</p> <ul style="list-style-type: none"> • HOOPP to notify its employees and the public about the availability of accommodation for job applicants with disabilities in its recruitment process

January 1, 2016	<p>Information for Employees</p> <ul style="list-style-type: none"> • HOOPP to inform its employees of HOOPP's policies that support those employees with disabilities, including HOOPP's policy on the provision of job accommodations that take into account an employee's accessibility needs due to a disability
January 1, 2016	<p>Accessible Workplace Information for Employees with Disabilities</p> <ul style="list-style-type: none"> • If requested by an employee with a disability, HOOPP to provide the employee with information that is: (i) required to perform that employee's job; and (ii) generally available to HOOPP employees in the workplace, in an accessible format and/or with communication supports
January 1, 2016	<p>Accommodation Plans for Employees with Disabilities</p> <ul style="list-style-type: none"> • HOOPP to develop, document and implement a process that sets out how HOOPP develops its individual accommodation plans for those employees with disabilities
January 1, 2016	<p>Return to Work Process</p> <ul style="list-style-type: none"> • HOOPP to develop, document and implement a return to work process for those employees who have been absent from work due to a disability and who require a disability-related work accommodation
January 1, 2016	<p>Performance Management, Career Development and Reassignment</p> <ul style="list-style-type: none"> • For those employees with a disability, HOOPP to take into account the employee's accessibility needs and accommodation plans when the employee is undergoing any of HOOPP's processes relating to performance management, career development or reassignment of roles