

WSIB CORPORATE POLICY

TITLE: **Accessibility**

OWNER: **Accessibility Office – Compliance Division**

STATUS: **Approved**

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OVERVIEW

The *Accessibility for Ontarians with Disability Act, 2005* (the “AODA”) is a provincial statute that outlines the requirements for developing, implementing and mandating accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises.

A detailed compliance framework for designated public sector organizations, including the Workplace Safety and Insurance Board (WSIB) is included in the Integrated Accessibility Standards Regulation (IASR) (O. Reg. 191/11) that defines the standards for accessibility in areas including:

- customer service
- information and communications
- employment
- design of public spaces
- transportation

The Accessibility Policy (the “Policy”) is developed to ensure that WSIB meets its compliance obligations for accessibility set out in the AODA and IASR (collectively, “AODA”) and in consideration of the related provisions of the Ontario *Human Rights Code*.

PURPOSE

The Policy defines:

- WSIB’s vision and goals for accessibility; and
- Expectations to ensure compliance with the AODA, its standards and regulations, and other applicable legislation and WSIB policies.

The overall goal is to increase accessibility for persons with disabilities in a way that is respectful of their dignity and independence and in a manner which takes into account the person’s disability and embodies the principles of integration and equal opportunity.

APPLICATION AND SCOPE

This Policy applies to the WSIB, including the Board of Directors, Senior Management, employees and contractors, and pertains to all services provided by the WSIB.

In scope are the accessibility needs of persons with disabilities including Clients and WSIB employees.

POLICY STATEMENT

WSIB is committed to establishing a barrier-free environment and meeting the requirements of the AODA and the organizational policies that address employees' human rights and privacy.

In fulfilling its mandate, WSIB strives to provide its services in a way that respects the dignity and independence of people with disabilities. WSIB is also committed to ensuring people with disabilities have the same opportunity to access WSIB services and benefits as others.

WSIB is also committed to ensuring its employment practices are accessible to meet the needs of employees and job applicants with disabilities.

To deliver on these commitments, WSIB shall identify, prevent, and remove barriers to accessibility that might interfere with the ability of the people with disabilities to interact with WSIB, or obtain goods and/or services in a timely manner, or use WSIB facilities, or work productively in the WSIB's workplace.

DEFINITIONS

For the purpose of this policy:

AODA means, the *Accessibility for Ontarians with Disability Act, 2005* and its Regulations.

Accessibility means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device, or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

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.

Assistive devices means an auxiliary aid such as communication aids, cognition aids, personal mobility aids, mobility assistive devices and medical aids (canes, wheelchairs, crutches, or hearing aids).

Barrier means anything that keeps someone with a disability from participating in all aspects of society. Examples of barriers include:

- Physical and architectural barriers: occur in the environment and prevent access for people with disabilities.
- Information or communications barriers: arise when a person with a disability

cannot easily receive and/or understand information that is available to others (e.g. publications that are not available in large print, digitally, Braille or other accessible formats);

- Technological barriers: occur when technology or the way it is used does not meet the needs of people with disabilities (e.g. a website that does not support screen reading software);
- Attitudinal barriers: may result in people with disabilities being treated differently than people without disabilities (e.g. a receptionist who talks to an individual's support person rather than the individual with a disability); or
- Systemic barriers in policies, practices and procedures result in people with disabilities being treated differently than others or sometimes excluded altogether.

Clients means the subset of the general public to whom WSIB provides goods, services and facilities, in the ordinary course of business, including, but not limited to, injured workers, employers, and other representatives of the public.

Communication supports may include, but are not limited to, captioning, alternative and augmentative communication supports (i.e. methods used to supplement or replace speech or writing for those with impairments in the production or comprehension of spoken or written language), plain language, sign language, and other supports that facilitate effective communication.

Guide Dog means a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Information means data, facts, and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

Person Requiring Assistance (PRA) means a person identified as requiring assistance at the time of an evacuation. This can be due to a medical condition or some other reason.

Person with Disabilities means an individual who has a disability. "Disability" is defined in the Ontario *Human Rights Code* as:

- 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 in 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; and
- 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*.

Service Animal means a service 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 the disability:
 - A member of:
 - the College of Audiologists and Speech-Language Pathologists of Ontario;
 - the College of Chiropractors of Ontario;
 - the College of Nurses of Ontario;
 - the College of Occupational Therapists of Ontario;
 - the College of Optometrists of Ontario;
 - the College of Physicians and Surgeons of Ontario;
 - the College of Physiotherapists of Ontario;
 - the College of Psychologists of Ontario; or
 - the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Persons means any person whether a paid professional, volunteer, family member, or friend who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

Temporary Disruption means a short term planned or unplanned disruption to facilities or services that persons with disabilities usually use to obtain WSIB's goods and/or services.

Undue Hardship: The duty to accommodate obliges the employer to make reasonable efforts to alter the workplace to accommodate an employee's disability related needs thus allowing the employee to properly carry out their work duties. This duty stops short of the employer experiencing "undue hardship". Such undue hardship generally involves excessive interference with a business' operation, or an increased risk to the health and safety of the employee, co-workers or others. What constitutes undue hardship varies based on the circumstances surrounding each individual case.

Web Content Accessibility Guidelines (WCAG) means the World Wide Web Consortium Recommendation, dated December 2008, entitled *Web Content Accessibility Guidelines 2.0*.

REQUIREMENTS

1. Accessible Client Service

1.1. WSIB shall make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- ensuring that all Clients receive the same value and quality;
- allowing Clients with disabilities to do things in their own way, at their own pace when accessing goods and services, as long as this does not pose a safety risk;
- using alternative methods when possible, to ensure that Clients with disabilities have access to the same services, in the same place and in a similar manner;
- taking into account individual needs when providing goods and services; and
- communicating in a manner that takes into account the Client's disability.

1.2. WSIB employees and agents are encouraged to be proactive in seeking solutions and removing barriers, as well as alerting all Clients to the range of available accommodations.

1.3. It is recommended that WSIB employees use the term "persons with disabilities" or "people with disabilities" and if a specific condition must be referenced, the condition be referenced last (e.g., person with low vision). To guide communication and interaction with or about people with all types of disabilities:

- It is important to put people first. It is more appropriate to say "person with a disability", rather than "disabled person" or "the disabled".
- It is best not to make assumptions. Wait until an individual describes their disability to you. Disabilities can be complex and our assumptions may be inaccurate.

1.4. Guide Dogs and Service Animals

1.4.1. If a person with a disability is accompanied by a guide dog, a service dog, or another service animal, WSIB will allow the person to enter any WSIB facility with the animal and to keep the animal with them

1.4.2. If it is not readily apparent that the animal is being used by the Client for reasons related to their disability, WSIB may request verification from the Client. Verification may include:

- a confirmation that the person requires the animal for reasons related to the disability (see Service Animal definition); or
- a certificate of training from a recognized guide dog or service animal training school.

1.4.3. It is the responsibility of the person with a disability to ensure that their

service animal is under their control at all times.

1.5. Use of Support Persons

- 1.5.1. If a person with a disability is accompanied by a support person, WSIB shall ensure that both persons are allowed to enter its premises together, and that the person with a disability is not prevented from having access to the support person.
- 1.5.2. WSIB may require the person with a disability to be accompanied by a support person when on WSIB's premises in the event that a support person is necessary to protect the health and safety of a person with a disability or the health and safety of others on the premises. This may only occur after consulting with the person with a disability.

1.6. Use of Assistive Devices

- 1.6.1. Persons with disabilities may use their own assistive devices as required when accessing WSIB's goods and/or services. In cases where the assistive device presents a safety concern or where a barrier may exist, other reasonable measures may be used to ensure the access of goods and/or services.
- 1.6.2. WSIB shall ensure that its employees and agents are familiar with the use of assistive devices available on WSIB's or its agent's premises, as appropriate to their duties, and inform persons with disabilities of the available assistive devices.

1.7. Notice of Temporary Disruptions

- 1.7.1. Service or facilities related disruptions may occur due to reasons that may or may not be within the control or knowledge of WSIB. Where possible, when a temporary disruption occurs, the WSIB will take reasonable steps to continue assisting people with disabilities.
- 1.7.2. WSIB shall provide Clients with notice in the event of a planned disruption in the facilities or services usually used by people with disabilities.
- 1.7.3. In the event of an unexpected disruption, WSIB shall make reasonable efforts to contact Clients with disabilities that may be impacted by the disruption prior to their scheduled meetings.
- 1.7.4. The notice shall include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
- 1.7.5. Notice(s) will be placed at visible place(s) on the premises (e.g., public entrances, service counters) and posted on the WSIB website. When posted notices are used, there must also be a plan to convey the information to people who may not see or cannot understand the signage. Notice can also be provided about service disruptions as may be appropriate, given the circumstances of the disruption and level of engagement.

1.8. Feedback Process

- 1.8.1. The ultimate goal of WSIB is to meet Client expectations while serving Clients with disabilities.
- 1.8.2. The Customer Experience Office within the Service Excellence Cluster shall ensure that the feedback process allows Clients to provide comments through the website, by email, phone or in-person.
- 1.8.3. Accessible formats and communication supports shall be made available upon request to persons wishing to provide feedback. Privacy shall be respected throughout the feedback process.
- 1.8.4. WSIB's response shall be in a format that respects the communication preference of the person with a disability. Additional time may be required for follow up depending on the format of response required.

1.9. Availability of Accessibility Documents

- 1.9.1. All documents required by the Accessibility Standards for Customer Service, including the WSIB Accessibility Policy, notices of temporary disruptions, and written feedback process shall be available upon request, subject to the WSIB Freedom of Information Policy.
- 1.9.2. When providing these documents to a person with a disability, WSIB shall endeavor to provide the document, or the information contained in the document, in a format that takes the person's disability into account.

2. AODA Training

- 2.1. The WSIB shall ensure that training, using appropriate methodologies, is provided to the following person(s):
 - all employees
 - every person engaged to deliver goods and/or services and/or facilities on WSIB behalf; and
 - any person involved in developing WSIB policies, as required by the AODA.
- 2.2. Training shall be provided to each person according to their duties as soon as reasonably practicable. Ongoing training shall be provided in connection with changes to WSIB's policies, practices and procedures governing the provision of goods and/or services and/or facilities to persons with disabilities.
- 2.3. WSIB shall maintain a training plan that integrates the requirements of the AODA.
- 2.4. WSIB shall ensure that the amount and format of training shall be in relation to the person's level of interaction with WSIB Clients.
- 2.5. WSIB shall maintain a record of the dates on which the training is provided and the individuals to whom it is provided.
- 2.6. Regardless of the format, training shall cover the following:

- A review of the purposes of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Accessibility Standards for Customer Service
- Instructions on how to interact and communicate with people with various types of disabilities
- Instruction on how to interact with people with disabilities who:
 - use an assistive device(s); or
 - require the assistance of a guide dog, service dog or other service animal; or
 - require the use of a support person
- Instructions on how to use equipment available on the WSIB premises or that WSIB provides that may help people with disabilities
- Instructions on what to do if a person with a disability is having difficulty accessing our services
- WSIB's policies, procedures and practices pertaining to providing accessible customer service to Clients with disabilities.

3. Information and Communication

3.1. Accessible Formats Available Upon Request

WSIB shall provide, upon request, to the people with disabilities who are WSIB Clients, the information under WSIB control, about WSIB's goods and/or services. Where possible, appropriate accessible format or communication supports shall be used. Such information shall be provided in a timely manner and take into account the accessibility needs of the person with a disability. This information will be provided at a cost that is no more than the regular cost charged to other persons.

3.2. WSIB shall notify the public about the availability of accessible formats and communication supports through its website and shall engage in an ongoing process of identifying additional accessible formats and communications supports that may be offered by WSIB.

3.3. Where WSIB determines that information or communications cannot be converted into an accessible format, WSIB shall provide the person requesting the information or communication with:

- an explanation as to why the information or communications are inconvertible; and
- a summary of the inconvertible information or communication.

3.4. Website Accessibility

3.4.1. Any new internet websites or web-based applications (including when making significant modifications to these) controlled directly by the WSIB or through a contractual relationship that allows for modification of a product shall conform to the WCAG Level A and increasing to level AA.

3.4.2. WSIB shall continue to work towards increasing the accessibility of its

existing web content, website(s) and web-based applications.

3.4.3. Beginning January 1, 2021: all public websites and web content posted after January 1, 2012 shall meet WCAG 2.0 Level AA other than criteria 1.2.4 (live captions) and 1.2.5 (pre-recorded audio descriptions).

3.5. Multi - Year Accessibility Plan and Annual Progress Reports

3.5.1. WSIB shall maintain and make public a Multi-Year Accessibility Plan to improve the accessibility of its goods, services and facilities and meet the compliance requirements of the AODA. The Plan shall be updated by the Accessibility Office within the Compliance Division at least once every five years and then posted on the WSIB's external website.

3.5.2. WSIB shall prepare an annual status report on the progress of measures taken to implement the Multi-Year Accessibility Plan.

3.5.3. The Accessibility Office shall ensure that the report is prepared in consultation with a cross-cluster team and posted on the WSIB public website.

3.6. Publicly Available Emergency Procedures and Safety Information

3.6.1. WSIB prepares for emergency situations and develops protocols for the protection of, and assistance to, everyone on WSIB's premises during an emergency. Publicly available emergency procedures and safety information will be made available in an accessible manner upon request.

3.6.2. The WSIB works with our building landlords to provide publicly available emergency procedures and safety information related to the building, upon request, to clients in an accessible format or with appropriate communication supports. Where a WSIB building landlord is unable to provide this information in an accessible format or with appropriate communication support, the WSIB will assist the client.

4. Procurement

4.1. When procuring or acquiring goods or services or facilities, WSIB shall incorporate accessibility criteria and features as defined by the applicable business area in consultation with the Accessibility Office. Where applicable, procurement documents shall specify the desired accessibility criteria to be met and provide guidelines for the evaluation of proposals in respect of those criteria.

4.2. Where WSIB determines that it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, WSIB shall provide a written explanation upon request.

5. Employment

5.1. Notice of Accommodation Availability in Recruitment and Selection

5.1.1. WSIB shall notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its

recruitment and selection process.

- 5.1.2. Upon request, WSIB shall make appropriate accommodation available, short of undue hardship, when applicants with disabilities are individually selected to participate in an assessment or selection process.
- 5.1.3. WSIB shall notify successful applicants of its policies for accommodating employees with disabilities when making offers of employment, and provide information about policies used to support employees as applicable after they begin employment as part of the orientation program.

5.2. Informing Employees of Supports

Human Resources shall ensure that employees are informed of all accessibility 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 will be provided to new employees as soon as possible after commencing employment.

5.3. Accessible Formats and Communication Supports for Employees

- 5.3.1. Upon request by an employee with a disability, WSIB shall provide, or arrange for, accessible formats and communication supports for information that is needed to perform their job, and information that is available to other employees. In order to determine the suitability of an accessible format or communication support, WSIB shall consult with the employee making the request.
- 5.3.2. Accessible formats and communications supports regarding general workplace information shall also be provided to employees with disabilities.
- 5.3.3. WSIB shall ensure that a formalized process is in place for development of documented individual accommodation plans for employees with disabilities.

5.4. Workplace Emergency Response Information and Individualized Plans

- 5.4.1. WSIB provides employees with disabilities workplace emergency response information in an accessible format or with appropriate communication supports.
- 5.4.2. The Healthy Workplace Centre (HWC) will work with employees with disabilities to develop individualized workplace emergency response plans when the employee identifies the need for an individualized plan by completing the "Persons Requiring Assistance Form". The plan will be shared with those designated to assist in an emergency while respecting the employee's confidentiality.
- 5.4.3. The HWC shall review all individualized workplace response plans annually with the employee to ensure currency. The plans shall also be reviewed on an ad hoc basis where:
 - the person requiring assistance moves to a different location; or

- when the person's accommodation needs change; or
- when WSIB reviews its general emergency response plan.

5.5. Documented Individual Accommodation Plans

5.5.1. WSIB shall accommodate the needs of its employees with disabilities to the point of undue hardship, as required under the Ontario Human Rights Code. WSIB shall develop individualized accommodation plans for its employees with disabilities, as WSIB is made aware.

5.5.2. The process by which WSIB consults, develops, determines, documents, reviews and routinely updates the individualized accommodation plan shall be formalized by the HWC.

5.5.3. The documented process for creating accommodation plans should include:

- How an employee participates in the development of their individual accommodation plan
- How an employee is assessed on an individual basis
- How a Bargaining Unit employee can ask for a representative from their bargaining agent to participate in the development of their accommodation plan
- How a Non-Bargaining Unit employee can ask for a representative from the workplace to participate in the development of the accommodation plan
- How WSIB, as an employer, can request assistance from an outside expert, at WSIB's expense
- The steps WSIB must take to protect the privacy of the employee's personal information
- How and when WSIB provides the employee with their personalized accommodation plan
- The schedule for when and how the plan shall be reviewed and updated
- How WSIB informs employees that their individual accommodation plan has/has not been accepted
- How WSIB shall provide the plan in an accessible format
- The plan must be documented and include:
 - how WSIB shall provide workplace information in an accessible format, if requested
 - how WSIB shall provide accessible emergency information, if needed
 - any other accommodation that is to be provided

5.5.4. WSIB as an employer, in consultation with the applicable employee, shall determine and implement appropriate accommodation measures, in accordance with the related Workplace Accommodation Policy.

5.5.5. WSIB shall implement and maintain measures to maintain the privacy of its employees with disabilities.

5.6. Return to Work (RTW) Process and Accommodation Plans

5.6.1. WSIB has an approved process for development of RTW individual accommodation plans for employees returning to work who have been absent due to a disability and who now require accommodation and support in order to return to work.

5.6.2. The RTW process clearly defines and outlines steps WSIB shall make to facilitate the return to work and shall include documented accommodation plans for each individual as part of the process. The above stated RTW process shall not replace, hinder or override any other RTW process created by or under any other statute (i.e. the *Workplace Safety and Insurance Act, 1997*).

5.7. Accommodation in Performance Management, Career Development and Advancement and Re-deployment

5.7.1 WSIB shall ensure its performance management; career development and advancement opportunities; and re-deployment processes are accessible to employees with disabilities.

6. Design of Office Layout and Public Spaces

6.1. WSIB shall ensure that its office layout and public spaces are accessible to persons with disabilities. When planning new office space or renovations to existing space, and within WSIB's control, WSIB shall ensure accessibility requirements are incorporated into the planning, design, and construction phases.

7. Accessibility Reporting

7.1. WSIB, as a designated public sector organization, shall file accessibility compliance reports every two years in accordance with the requirements set out in IASR.

7.2. Notice of availability shall be provided on the website, through printed materials and posted within WSIB premises.

7.3. Documents shall be provided in an accessible format or with communication support upon request, and in a timely manner that takes into account the person's accessibility needs due to disability.

8. Roles and Responsibilities

8.1. The President and CEO is accountable for:

- approving the Policy; and
- ensuring implementation of the policy.

8.2. Chief Risk Officer is responsible for

- providing a framework and methods to WSIB management to enable AODA compliance aligned with the overall risk management approach; and

- providing leadership to the WSIB Accessibility Office.
- 8.3. Vice President of Compliance is responsible for:
- leading the design, implementation, delivery and operation of the Accessibility Program and working collaboratively with WSIB's management and stakeholders to support implementation; and
 - ensuring WSIB's compliance with applicable AODA requirements.
- 8.4. Senior Management is responsible for:
- supporting and promoting the policy in their area of direct report and throughout the organization;
 - being aware of corporate liability for non-compliance with legislative requirements, including fiscal responsibility, human costs and human rights issues;
 - building accessibility planning into the existing corporate and strategic business cycles as well as other planning processes and budgets;
 - implementing this policy and developing or amending applicable divisional procedures or documents in order to adhere to the policy;
 - designating an accessibility Champion to implement accessibility policies and procedures in each cluster and making sure the related cluster/ divisional documents remain in step with the WSIB accessibility plans; and
 - approving accessibility reports as required.
- 8.5. Accessibility Office is responsible for:
- documenting, maintaining and updating this policy;
 - preparing the annual status report in consultation with areas that have specific AODA responsibilities and making it available on WSIB's website;
 - ensuring AODA Multi-Year Accessibility plan, the annual status report and relevant AODA information are posted on the WSIB website;
 - filling the AODA Corporate Compliance Report with the Ontario Government; and
 - addressing AODA concerns escalated to the Accessibility Office.
- 8.6. WSIB Managers and Supervisors are responsible for:
- raising awareness to facilitate understanding of the policy;
 - demonstrating sensitivity to and respect confidentiality of information; and
 - participating and co-operating to facilitate workplace accommodation, including the development of contingency plans.
- 8.7. Human Resources is responsible for:
- acting as a resource for all parties and participants in workplace accommodation;
 - supporting and educating managers in their obligations by providing training

on the Workplace Accommodation Policy and Work Safe/Disability Management Program;

- ensuring the individualized accommodation plans are formalized and periodically reviewed and updated;
- developing emergency response plans for persons requiring assistance during emergency situations, in consultation with the person(s) that submitted a related request via “Persons Requiring Assistance Form”; and
- ensuring recruitment practices are accessible/barrier free.

8.8. Communications is responsible for:

- developing accessible design standards for posting information to internet and intranet sites and to inform WSIB business areas of requirements;
- ensuring accessible design guidelines such as WCAG are being followed when posting content on the WSIB public website and Intranet sites;
- converting existing emergency and public safety information into a digital file for easy conversion to accessible formats; and
- developing a procedure so that WSIB communications are available to employees with disabilities at the same time as everyone else.

8.9. WSIB Internet, Intranet and SharePoint Content Owners are responsible for:

- ensuring internet, intranet and SharePoint content conforms to WSIB accessible design standards.

8.10. Real Estate and Facilities Management is responsible for:

- incorporating accessibility design criteria and features when procuring or redesigning any space owned or leased by WSIB;
- redesigning office space when required by persons with disabilities; and
- working with WSIB building landlords to ensure emergency procedures, plans or public safety information is available in an accessible format or with appropriate communication supports on request.

8.11. Customer Experience Office is responsible for:

- ensuring that feedback process is documented and is working effectively as required and soliciting such feedback; and
- converting information, by persons with disabilities in an accessible format, upon request, or ensuring the use of appropriate communication supports, where available.

8.12. Reception employees and management are responsible for:

- ensuring reception areas and equipment in reception areas are accessible and reporting problems to appropriate areas for resolution;
- reporting any accessibility and/or equipment concerns for reception areas to their local management; and

- formulating plans, in conjunction with local management and security, for advising Clients and delivering services if reception areas or WSIB buildings are not accessible for people with disabilities.

8.13. Security Branch is responsible for:

- participating in planning for the management of Clients with disabilities during emergency situations; and
- assisting in formulating security plans and the posting of signage when there is a disruption to accessible services.

8.14. Emergency Management and Business Continuity Planning is responsible for:

- ensuring emergency plans are established and annually reviewed for WSIB employees who are Persons Requiring Assistance (PRA's).

8.15. Procurement is responsible for:

- meeting AODA requirements when procuring goods, services or facilities.

8.16. Information Technology is responsible for

- incorporating accessibility design criteria and features in the development of new tools and systems or when a significant upgrade is being implemented.

8.17. All WSIB employees are responsible for:

- ensuring they understand the intent of this policy;
- complying with the provisions of this policy; and
- completing required training.

8.18. Employees with disabilities are responsible for:

- participating and cooperating with all parties to facilitate workplace accommodation; and
- informing the HWC of their need for accommodation in an emergency by completing "Persons Requiring Assistance Form".

POLICY MAINTENANCE

This Policy is reviewed every three years or sooner, if necessary.

Inquiries about the Policy should be addressed to the Accessibility Office, Compliance Division.

RELATED DOCUMENTS

This Policy should be read in conjunction with the following documents, as applicable:

- [Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)](#) and [Integrated Accessibility Standard Regulation \(IASR\)](#)
- [Blind Persons' Rights Act](#)
- [Ontarians with Disabilities Act, 2001](#)

- [Ontario Human Rights Code](#)
- [Workplace Safety and Insurance Act](#)
- *WSIB Enterprise Privacy Policy*
- *WSIB Employee Privacy Policy*
- *WSIB Facilities Construction / Renovation Policy*
- *WSIB Freedom of Information Policy*
- *WSIB Mental Health in the Workplace Policy*
- *WSIB Procurement Policy*
- *WSIB Real Estate / Property Lease Policy*
- *WSIB Recruitment and Selection Policy*
- *WSIB Workplace Accommodation Policy*
- *Persons Requiring Assistance Form*

EFFECTIVE DATE

The Effective Date of this Policy is July 15, 2018