

Integrated Standard Policy

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RBC® Place London

RBC Place London Integrated Accessibility Standards Policy for the Implementation of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*

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1. PURPOSE/BACKGROUND INFORMATION

The *Accessibility for Ontarians with Disabilities Act, 2005* (the "AODA") is a Provincial Act with the purpose of developing, implementing and enforcing accessibility standards in order to achieve accessibility for persons with disabilities with respect to goods, services, facilities, accommodation, employment, buildings, structures, and premises.

Under the AODA, Ontario Regulation 191/11 entitled "Integrated Accessibility Standards" came into force on July 1, 2011. This regulation establishes accessibility standards specific to information and communications, employment, transportation, and the design of public spaces for public and private sector organizations that provide goods, services or facilities to the public or other third parties.

2. APPLICATION & SCOPE

This policy has been drafted in accordance with the Regulation and addresses how RBC Place London achieves accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that will be followed to meet the accessibility needs of persons with disabilities in the provision of goods, services and facilities.

This policy applies to all employees; all persons who participate in developing the organization's policies; and all other persons who provide goods, services or facilities on behalf of the organization.

3. DEFINITIONS

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.

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Communications

The interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

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.

Disability

- 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 coordination, 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*.

Kiosk

An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Mobility Aid

A device used to facilitate the transport, in a seated posture, of a person with a disability.

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Web Content Accessibility Guidelines (WCAG)

World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0"

4. STATEMENT OF COMMITMENT

RBC Place London is committed to providing quality goods and services that are accessible to all persons we serve and in a manner that respects the dignity and independence of persons with disabilities. We are committed to meeting the needs of persons with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility in customer service, information and communication, employment, the built environment and transportation. We are committed to meeting the requirements of applicable legislation, including the AODA and the *Human Rights Code*.

5. GENERAL PROVISIONS

a) Multi-Year Accessibility Plan

RBC Place London will establish, implement, maintain and update a Multi-Year Accessibility Plan which outlines the organization's strategy to prevent and remove barriers and meet requirements under the Integrated Accessibility Standards. The Multi-Year Plan will be posted on the website and made available in an accessible format upon request. The Multi-Year Plan will be reviewed and updated once every five years.

b) Procuring or Acquiring Goods, Services or Facilities

RBC Place London shall incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so. In the event it is not practicable to do so, an explanation will be provided upon request.

RBC Place London shall incorporate accessibility features when designing, procuring, or acquiring self-service kiosks.

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c) Training

RBC Place London will ensure that training is provided as required by the Integrated Accessibility Standards. The content of the training will include the requirements of the accessibility standards referred to in Ontario Regulation 191/11 and the *Human Rights Code* as it pertains to persons with disabilities. The training provided shall be appropriate to the duties of those being trained.

Training will be provided as soon as practicable, as well as on an ongoing basis if changes to this policy occur. RBC Place London will keep records of the training, including the date on which training is provided and the number of individuals to who it is provided. The names of individuals trained will be recorded for training administration purposes, subject to the *Municipal Freedom of Information and Protection of Privacy Act* ("MFIPPA").

6. INFORMATION AND COMMUNICATIONS STANDARDS

RBC Place London is committed to meeting the communication needs of persons with disabilities in accordance with the Integrated Accessibility Standards and will notify the public about the availability of accessible formats and communications supports as required.

Upon request, RBC Place London will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at a cost that is no more than the regular cost charged to other persons. In determining the suitability of an accessible format or communication support, RBC Place London will consult with the person making the request.

If RBC Place London determines that information or communications are unconvertible, it shall provide the individual requesting the information or communication with an explanation as to why the information or communications are unconvertible and a summary of the unconvertible information or communications.

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a) Feedback

RBC Place London has processes in place for receiving and responding to feedback and will ensure that these processes are provided in an accessible manner and with communication supports upon request.

b) Emergency Information

Where RBC Place London prepares emergency procedures, plans or public safety information and makes the information available to the public, RBC Place London shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

c) Accessible Website and Web Content

RBC Place London shall make its Internet website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0) as required by the Integrated Accessibility Standard.

7. EMPLOYMENT STANDARDS

RBC Place London is committed to fair and accessible employment practices.

The Employment Standards outline requirements for the accommodation of persons with disabilities during the recruitment process and throughout employment with RBC Place London:

a) Recruitment

RBC Place London shall notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes.

Specifically, RBC Place London shall:

- notify job applicants when they are individually selected to participate in an assessment or selection process that

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accommodations are available upon request in relation to the materials or processes to be used;

- if a selected applicant requests an accommodation, 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;
- notify successful applicants of the policies for accommodating employees with disabilities when making offers of employment.

b) Informing Employees of Supports

RBC Place London shall inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

This information shall be provided to new employees as soon as practicable after they begin their employment and shall be updated for all employees whenever there is a change to the existing policies.

c) Accessible Formats and Communication Supports for Employees

Upon request by an employee with a disability, RBC Place London shall consult with the employee to provide or arrange for the provision of suitable accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

d) Workplace Emergency Response Information

RBC Place London shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation. RBC Place London shall provide the information as soon as practicable after becoming aware of the need for accommodation.

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If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, RBC Place London shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

RBC Place London shall review the individualized workplace emergency response information:

- when the employee moves to a different location in the organization,
- when overall accommodation needs or plans are reviewed, and
- when the employer reviews its general emergency response policies.

e) Documented Individual Accommodation Plans

RBC Place London shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. The process shall include the following elements:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which RBC Place London may request an evaluation by an outside medical or other expert, at RBC Place London's expense, to assist with determining if accommodation can be achieved and, if so, how to achieve accommodation;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;

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- If an individual accommodation plan is denied, the manner in which the reasons for the denial are to be provided to the employee;
- The means of providing the accommodation plan in a format that takes into account the employee's accessibility needs;

Individual accommodation plans shall:

If requested, include any information regarding accessible formats and communications supports provided; if requested, include individualized workplace emergency response information; and identify any other accommodation that is to be provided.

f) Return to Work Process

RBC Place London shall have in place a documented return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. The process shall outline the steps RBC Place London will take to facilitate the return to work of employees absent due to disability and include documented individual accommodation plans.

g) Performance Management, Career Development and Advancement, Redeployment

RBC Place London shall take into account the accessibility needs and/or individual accommodation plans of employees when:

- Using performance management processes;
- Providing career development and advancement ; and
- Using redeployment.

8. TRANSPORTATION STANDARDS

a) Does not apply

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9. DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILDING ENVIRONMENT)

RBC Place London is committed to designing public spaces that are free from barriers and accessible to all persons we serve. RBC Place London will comply with the Design of Public Spaces Standards with respect to public spaces that are newly constructed or redeveloped, including:

- Outdoor public use eating areas
- Exterior paths or travel
- Accessible parking
- Obtaining services