

OLG Internal

AODA Integrated Accessibility Standards

Governance, Legal & Compliance

Purpose

The Integrated Accessibility Standards Regulation (Ontario Regulation 191/11) under the Accessibility for Ontarians with Disabilities Act (AODA) came into force on July 1, 2011 and was amended on July 1, 2016 to include the requirements of the Customer Service Standards Regulation (Previously Ontario Regulation 429/07). The regulation establishes standards to address barriers that people with disabilities face in the areas of information and communications, employment, and transportation, aspects of the design of public spaces, and customer service. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

The purpose of these Standards is to:

- Promote accessible and inclusive practices within OLG that empower Ontarians with disabilities
- Ensure that Ontario Lottery and Gaming Corporation (OLG) complies with the Government of Ontario's Integrated Accessibility Standards Regulation.
- Provide transparency to Ontarians with respect to OLG's intentions to abide by requirements set out under IASR

Application and Scope

These Standards apply to all OLG employees.

These Standards are considered a policy document and hold the same authority level as an OLG policy.

Guiding Principles

OLG is committed to fostering an inclusive culture across the organization and removing barriers for people with disabilities. As such, OLG supports the principles of the AODA and the Integrated Accessibility Standards Regulation and strives to provide goods, services and facilities in a manner that respects the dignity and independence and unique needs of people with disabilities. We are committed to giving people with disabilities the same level of quality and access to our goods and services and facilities that is available to other customers. When necessary, we will offer alternative options for people with disabilities to ensure accessibility.

Where it is not possible to remove barriers, OLG will make efforts to accommodate people with disabilities in a timely, effective, and suitable manner.

Definitions

Accessible Formats: may include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by people with disabilities.

Assistive Devices: products or services that can help an individual carry out daily activities with greater ease and independence, such as a walker, a white cane used by a blind person or a person with low vision, a note-taking device, a personal oxygen tank, TTY (Telephone Teletype), or an amplification system.

App (Application): Software providing features and functionality for user consumption on devices such as, but not limited to, desktop computers, mobile devices, kiosk, or self-service terminals.

Barrier: anything that prevents a person with a disability from fully participating in one or more aspects of society, including a physical barrier, an architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

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: according to the Ontario Human Rights Code, as referenced by AODA, means:

- 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.
- an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

Disabilities may differ in severity, may be visible, invisible, and have effects which may come and go.

Employee: full-time, part-time, or contracted staff member; temporary or seasonal staff member; student; intern; consultant.

Guide Dog: a dog trained as a guide for a blind / visually impaired person and having the qualifications prescribed by the regulations for the Blind Persons' Rights Act.

Information: any document or electronic data that conveys meaning, regardless of format or the medium where it is stored.

Internet Website: a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier and is accessible to the public.

Kiosk / Self-service terminal: an interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or goods or both.

New Internet Website: either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Service Animal: a dog or other animal used by a person with a disability for reasons relating to their disability. Service animals are not pets. They perform some of the functions and tasks that people with disabilities cannot perform for themselves.

a) it can be readily identified by visual indicators such as a vest or harness worn by the animal; or
b) the person provides documentation from one of the following regulated health professionals confirming that they need the animal for reasons relating to their disability:

- A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
- A member of the College of Chiropractors of Ontario.
- A member of the College of Nurses of Ontario.
- A member of the College of Occupational Therapists of Ontario.
- A member of the College of Optometrists of Ontario.
- A member of the College of Physicians and Surgeons of Ontario.
- A member of the College of Physiotherapists of Ontario.
- A member of the College of Psychologists of Ontario.

- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support Person: another person 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.

Third Party: any person or entity that has agreed with OLG to provide services to the public on its behalf. This includes, but is not limited to, all third parties overseen by OLG's Service Delivery Management, resort gaming facilities, OLG's cGaming facilities, iGaming, and contest administration services.

Requirements

1. Confidentiality of Information

Personal information concerning an individual's disability cannot be released without written consent of the individual and must be managed in a manner that is consistent with Freedom of Information Guidelines and Personal Information Protection Guidelines, where appropriate. Where the accommodation process requires the release of confidential information to a third party (such as an external resource group), the third party, and any person or department delegated by that third party, will be required to ensure that confidentiality is protected, that the information obtained is kept in a secure location, and used solely for the purpose that the release was required.

2. Accessibility Policies

Through the AODA Integrated Accessibility Standards, OLG confirms our commitment to meet the needs of people with disabilities in a timely manner. OLG will make these documents available upon request and provide them in an accessible format upon request.

3. Accessibility Plans

OLG will maintain a multi-year accessibility plan and review and update it once every five years.

OLG will post the plan on its website and provide it in accessible format upon request.

OLG will prepare an annual status report on the progress of measures taken to implement its strategy, post the report on its website and provide it in an accessible format upon request.

4. Procuring or Acquiring Goods, Services or Facilities

OLG will incorporate accessibility features and criteria when procuring or acquiring goods or services or facilities, except where not practicable to do so. Where it is deemed not practicable to do so, OLG will provide an explanation upon request.

5. Self-Service Kiosks

OLG will incorporate accessibility features when designing, procuring, or acquiring self-service kiosks, except where not practicable to do so.

6. Training

OLG will provide training to all employees, co-op students and volunteers on the requirements of accessibility standards and on the Ontario Human Rights Code as it pertains to people with disabilities.

The training will be delivered via e-learning that incorporates accessibility features, such as closed captioning and volume control, and also in accessible format.

Human Resources will deliver the training module and maintain the necessary records to monitor employee compliance.

7. Information and Communications

7.1. Feedback

OLG will ensure that its processes for receiving and responding to feedback are accessible to people with disabilities and will notify the public about the availability of accessible formats and communications supports.

7.2. Accessible formats and communication supports

- i. OLG shall provide or arrange for accessible formats and communication supports for people with disabilities in a timely manner that takes into account each person's accessibility needs.
- ii. OLG will consult with the person making the request to determine the suitability of an accessible format or communication support.
- iii. Communications supports will be provided at a cost that is no more than the regular cost charged to other people.

7.3. Accessible websites and web content

OLG will make its internet websites and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.1 Level AA, except where not practicable to do so.

8. Employment

OLG's policies and practices are intended to build an inclusive and accessible work environment free from discrimination and harassment, i.e.,: Respectful Workplace – Human Rights and Anti-Harassment/Discrimination Policy.

9. Design of Public Spaces

OLG is committed to ensuring OLG facilities that are redeveloped or newly constructed will incorporate accessibility requirements into the planning, design and construction phases.

10. Customer Service

10.1 Communication

10.1.1. OLG employees will respectfully take into account the customer's disability when interacting or communicating with them.

10.1.2. OLG employees have been trained in how to interact and communicate with customers with disabilities guided by the following principles:

- **Principle of Dignity:** refers to service being provided in a way that allows the person with a disability to maintain self-respect and the respect of other people.
- **Principle of Equal Opportunity:** refers to people with disabilities having an opportunity equal to that given to others to access your goods or services or facilities.
- **Principle of Independence:** refers to allowing a person with a disability to do things on their own without unnecessary help, or interference from others.
- **Principle of Integration:** refers to service being provided in a way that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as other customers, unless an alternate measure is necessary to enable the person to access goods or services or facilities.

10.2. Format of Documents

10.2.1. Upon request, documents will be provided to customers in alternative formats that will take into account the person's disability.

10.3. Use of Assistive Devices

10.3.1. OLG recognizes that some individuals with disabilities use their own personal assistive devices in order to access goods and services and facilities. OLG will permit these individuals to use their assistive devices to obtain, use, or benefit from its goods and services and facilities.

10.3.2. OLG may offer a person with a disability other reasonable measures to assist the person in obtaining, using or benefiting from OLG's goods and services and facilities. Where OLG has such other measures available, this will be documented in its respective policies, practices and procedures.

10.4. Support Persons

10.4.1. If a person with a disability is accompanied by a support person, OLG will ensure that both people are permitted to enter OLG premises, provided the support person agrees to applicable OLG rules and requirements, including age restrictions.

10.4.2. If a support person is necessary for the health and safety of a person with a disability, the support person must remain with the person with a disability at all times.

10.4.3. OLG, in consultation with a person with a disability and considering the available evidence, may determine that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises. If there is no other reasonable way to protect their health and safety then OLG will waive the payment (if any) of the support person's admission to the premises.

10.4.4. For all events and promotions at any or all OLG sites, standard costs will apply to support persons accompanying a person with a disability.

10.5. Notice of Disruptions in Services and Facilities

10.5.1. When possible, OLG shall give notice to public if there is a temporary or planned disruption affecting facilities or services that people with disabilities usually use in accessing OLG's goods or services or facilities.

Notice of the disruption will include:

- The reason for the disruption
- Anticipated duration
- A description of what alternative facilities or services are available, if any

10.5.2. When a disruption occurs unexpectedly, notice shall be posted as soon as possible, at a conspicuous place on the OLG premises or provided by such other method reasonable in the circumstances.

10.6. Feedback Process

10.6.1. Feedback processes regarding the way OLG provides goods and services and facilities to people with disabilities will allow for comments in person, by telephone, in writing, by e-mail, or via OLG public website.

10.6.2. Feedback processes including actions required if a complaint is received shall be documented in OLG feedback/complaint management procedures.

10.7. Training

10.7.1. OLG will ensure appropriate levels of training are provided to employees on the provision of goods and services and facilities to people with disabilities.

10.7.2. OLG's new hire training program incorporates an AODA Accessible Customer Service segment. Employees will be trained on an ongoing basis in connection with changes in OLG policies, practices and procedures.

10.7.3. OLG will keep records of the training provided, including dates when training was provided and the number of employees trained.

10.8. Availability of Documents Required by AODA

10.8.1. As required by Ontario Regulation 191/11, OLG will make available to any person, upon request the following documents describing:

- OLG's policies, practices and procedures governing the provision of goods and, services and facilities to people with disabilities
- OLG's policies, practices and procedures governing the use of guide dogs and service animals and support persons
- The steps the OLG will take in connection with a temporary disruption of facilities or services usually used by people with disabilities
- OLG's policy on providing training on accessible customer service
- OLG's process for receiving and responding to feedback on the provision of goods or services or facilities to people with disabilities

10.9. Third Party Goods and Services

10.9.1. OLG will take measures to ensure third parties comply with AODA when providing goods and services and facilities on behalf of OLG. AODA provisions must be included in contracts, terms and conditions, policies, and/or other compliance documents.

11. Accessibility Reports

OLG will file an accessibility report with the Government of Ontario every two years, following the report filed in December 2013.

12. Third Party Goods and Services

OLG will take measures to ensure third parties comply with AODA when providing goods and services on behalf of OLG. AODA provisions must be included in contracts, terms and conditions, policies, and/or other compliance documents.

13. Service Animals

13.1. OLG will ensure that a person with a disability who is accompanied by a guide dog or other service animal is permitted to enter OLG premises that are open to the public and to keep the animal with him or her unless the animal is otherwise excluded by law from the premises.

13.2. If a service animal is excluded by law from the premises, other measures to enable the person with a disability to obtain, use or benefit from OLG's goods or services may be used.

13.3. People with disabilities accompanied by a guide dog or service animal may access all areas where they would normally be allowed and will not be segregated from other employees, visitors or customers.

13.4. Service animals need to be in harness or identified by medical certification as noted in the Definitions section of these Standards.

13.5. Pets are not allowed on OLG premises.

13.6. The owner must be in control of the service animal at all times. Owners are responsible for their animals and for any damages caused by the animals. Any guide dog or service animal behaviour that poses a direct threat to the health and safety of other customers may be excluded from OLG premises. However, the person with a disability will have the option of continuing to use OLG services and facilities without having their guide dog or service animal on the premises.

13.7. There are specific questions that may be asked of a person being accompanied by a service animal. If it is not readily apparent, an OLG employee may ask:

- If the service animal is required because of a disability

- If an animal is a service animal and what services it provides
- If the person has documentation from a health professional confirming they require the animal for reasons relating to their disability

13.8. Employees may NOT ask questions about a person's disability.

13.9. If further assistance is required, employees should contact OLG's Accessibility Department.

Roles and Responsibilities

Role	Responsibilities
Accessibility Department (GLC)	<ul style="list-style-type: none"> ▪ Reviewing and amending these Standards to ensure ongoing compliance with AODA ▪ Complying with AODA reporting requirements, including biennial filing with the Government of Ontario. ▪ Establishing / maintaining organizational accessibility strategy ▪ Providing advice and direction on accessibility issues ▪ Training staff as need is identified
People & Culture	<ul style="list-style-type: none"> ▪ Monitoring and maintaining records on employee AODA training ▪ Ensuring that OLG employees are informed of these Standards at the time of hire
Management	<ul style="list-style-type: none"> ▪ Implementing these Standards and developing or amending applicable divisional procedures or documents in order to adhere to these Standards ▪ Ensuring OLG employees acknowledge that they have been informed of and understand these Standards through training ▪ Monitoring practices and staff performance to ensure compliance with these Standards ▪ Approving accessibility reports as required
Employees	<ul style="list-style-type: none"> ▪ Ensuring that they understand the intent of these Standards ▪ Complying with the provisions of these Standards by embedding relevant accessibility practices in to their workstreams

Related Policy Instruments

- Respectful Workplace – Human Rights and Anti-Harassment/Discrimination Policy
- [Ontario Human Rights Code](#)
- [Accessibility for Ontarians with Disabilities Act](#)
- [Integrated Accessibility Standards Regulation 191/11](#)
- [Blind Persons' Rights Act](#)
- [United Nations, Declaration of the Rights of Disabled Persons](#)

Standards Owner

Director, Accessibility

Standards Approval

Approver	Date
Tony Wong, VP Legal Services	July 21, 2017

Revision / Review History

Revision / Review Date	Updated By	Summary of Revision / Review
January 19, 2023	Policy Services & Accessibility Department	<ul style="list-style-type: none">▪ Updated format - Standards▪ Supersedes AODA Integrated Accessibility Standards Policy #CP-06-01-002, AODA – Service Animals #CP-06-01-003, Accessibility Standards for Customer Service #CP-06-01-001

Appendix A: Guide to Interacting with Service Animals

How to Recognize a Service Animal

- A service animal is a dog or other animal trained to assist a person with a disability.
- The most common service animals are dogs. Service dogs perform some of the functions and tasks that people with disabilities cannot perform for themselves. Some examples of service dogs include: (this list is not exhaustive)
 - A Guide Dog: a type of service dog used by some individuals who are blind/visually impaired.
 - A Hearing Dog: a type of service dog trained to alert people with hearing disabilities to sounds.
 - A Special Service Dog: a type of service dog trained to pull wheelchairs or carry and pick up things for people with mobility difficulties.
 - An Assist Dog: a type of service dog trained to assist people who have mobility impairments with balance.
 - Other types of Special Skills Service Dogs are trained to provide seizure response to people with epilepsy.
- Nowadays, other species such as Capuchin monkeys or miniature horses are used to provide support. For example, a mobility assistance animal may fetch objects, pull a wheelchair, or push an elevator button. A seizure response animal warns a person of an impending seizure or provides aid during a seizure.
- Most service animals are identified by a 'uniform' such as a harness or vest.
- Under the AODA standard, an animal is a service animal if it is readily apparent that it is used by a person for reasons relating to their disability.
- Alternatively, the person may have a letter from a physician or nurse verifying that the animal is required for reasons relating to their disability.

How to Interact with a Service Animal

- Pay attention to the owner, not the service animal.
- Avoid petting or talking to a service animal; the animal is working and must not be distracted from its tasks.
- If the animal is off-harness, request permission before petting or talking to it.
- Do not request that the animal be left in a different location, such as outside an office.

Guide Dog Etiquette

When you come across a person using a guide dog, please remember that they are concentrating on working together as a team. For the safety of the person and their dog, keep in mind these tips on Guide Dog Etiquette:

- Don't disturb or pet a dog that is working in harness.
- Ask permission first before approaching or petting a dog that is not working.
- Don't offer food or treats to a guide dog; unscheduled feeding may hamper the dog's ability to work.
- If you wish to assist a person with a guide dog:
 - Ask if you can be of help
 - Offer your left elbow for the person to hold
 - Don't touch or grab the dog, harness, leash, or the person's arm