




Department: Corporate	 Waterloo North Hydro Inc.	Issued Date: 2011 12 22
Document Owner: HR Generalist		Review Date: 2017 12 13
Prepared By: Kristen Lefor		Review Frequency: 1 year
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1.0 Purpose

To provide a workplace that is accessible to all employees and customers in accordance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

2.0 Description

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 429/07, Accessibility for Ontarians with Disabilities came into force on January 1, 2008. That regulation establishes accessibility standards specific to customer service for organizations that provide goods and services to members of the public or other third parties.

Waterloo North Hydro Inc. (WNH) has created a plan to implement the requirements of AODA in compliance with Regulation 191/11.

WNH is committed to taking all reasonable steps to sustain the health, safety, and dignity of employees, workers and customers. WNH will ensure their goods and services allow persons with disabilities the equal opportunity to obtain, use, or benefit from them.


To meet this commitment, this document outlines three elements¹ to meet the diverse needs of our customers including:

- (a) Customer Service
- (b) Information and Communications
- (c) Employment

3.0 Application

This policy applies to the provision of services by Waterloo North Hydro and all persons who serve members of the public or other third parties on behalf of WNH. This includes persons who do so as employees, agents or contractors, volunteers, and students. Furthermore, it applies to all persons who participate in developing WNH's policies,

¹ There are five elements required by the AODA standard: 1) information and communication, 2) employment, 3) transportation, 4) design of public spaces, and 5) customer service. Elements 3) and 4) do not apply to WNH

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practices and other procedures governing the provision of goods and services to members of the public or other third parties.

3.1 Exclusions

This Accessible policy shall not apply during any period where an emergency, as defined under the Emergency Management and Civil Protection Act, 1990, has been declared.

4.0 Multi-Year Accessibility Plan

WNH's Multi-Year Accessibility Plan outlines a phased-in strategy to address the current and future requirements of the *Accessibility for Ontarians with Disabilities Act (AODA), 2005* to prevent and remove barriers. WNH will report annually on the progress of the implementation plan, will post the information on the WNH website and will provide the information in alternative formats upon request. The plan will be reviewed and updated at least once every five years.

5.0 Definitions

5.1 Accessible Formats

Accessible formats include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

5.2 Assistive Device

Any device used to assist persons with disabilities to increase, maintain or improve functional capabilities when accessing the services provided by WNH.

5.3 Communication Supports


Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

5.4 Conversion Ready

An electronic or digital format that facilitates conversion into an acceptable format.

5.5 Disability

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,

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or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

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

5.6 Nurse

A Registered Nurse or Registered Practical Nurse who is a registered member in good standing with the College of Nurses of Ontario.

5.7 Performance Management

Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

5.8 Physician

A physician who is a registered member, in good standing with the College of Physicians and Surgeons of Ontario.

5.9 Redeployment

The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

5.10 Service Animal


Any animal used by a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or if the person provides a letter from a physician or nurse confirming that the animal is required for reasons relating to the disability.

5.11 Service Disruption

For the purpose of this policy, a service disruption is the planned or unplanned unavailability of facilities or services provided by Waterloo North Hydro.

5.12 Support Person

For the purpose of this policy, a support person is someone who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, medical needs or with access to goods or services.

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5.13 Unconvertible

For the purpose of this policy, means if it is not technically feasible to convert the information or communications. It also means if the technology to convert the information or communications is not readily available.

6.0 Customer Service

6.1 Provision of Goods and Services to Persons with Disabilities

WNH will take all reasonable steps to ensure that its policies, practices and procedures are consistent with the principles of independence, integration, dignity and equal opportunity as afforded to those persons who do not have disabilities.

6.2 Training

WNH will take all reasonable steps to ensure that all persons to whom this policy applies receive training in Accessibility for Ontarians with Disabilities. Training will be provided as soon as practicable upon an individual being assigned the applicable duties as well as on an ongoing basis as changes occur. The format and amount of training will be customized to suit each person's interactions with the public and his or her involvement in the development of policies, procedures and practices pertaining to the provision of goods and service.

6.3 Records

WNH will maintain records on the training provided, when it was provided and the number of employees that were trained.

6.4 Temporary Service Disruptions


Temporary disruptions in WNH's services and facilities may occur that may or may not be within WNH's control or knowledge.

WNH will make reasonable effort to provide public notice of the disruption including a description of alternate facilities or services if applicable. WNH will make a reasonable effort to provide advance notice of planned disruptions recognizing that in some circumstances such as unplanned temporary disruptions, advance notice will not be possible.

When temporary disruptions occur, notices will be posted in visible places at or on our facilities or by any other method that is reasonable under the circumstances including WNH's [website](#) and social media feeds [@wnhydro](#) and [facebook.com/wnhydro](#).

6.5 Service Animals

Persons with a disability who are accompanied by a service animal are welcome at WNH facilities that are open to the public and the animal is not otherwise

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excluded by law. If a service animal is excluded by law, WNH will ensure that alternate means are available to enable the person with a disability to obtain, use or benefit from WNH's goods and services.

If a person utilizing the services of a guide animal is entering WNH facilities, control of the animal is the sole responsibility of the person with a disability. Compliance with all legislation is mandatory. In the case that a service animal is not kept under control (i.e. if the guide dog or service animal has bitten another person or animal, or is a menace to the safety of other persons or animals) the guide dog or service animal, accompanied by a person, may be required to leave the premises at the discretion of WNH.

If a conflict should arise concerning a service animal, WNH employees will attempt to balance the needs of all persons involved by following conflict resolution strategies. These strategies will include collecting appropriate information from all persons involved and observing the rights of all individuals involved according to the Ontario Human Rights Code and the Canadian Human Rights Act.

6.6 Support Persons

A person with a disability may be accompanied by a support person and have access to the support person while on the premises. WNH may require a person with a disability to be accompanied by a support person where it is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises.

6.7 Assistive Devices

A person with a disability may provide their own assistive devices to assist with accessibility. The only exception could be if it is deemed that the assistive device poses a risk to the health and safety of a person with a disability or the health and safety of others on the premises.


It should be noted that it is the responsibility of the person with a disability to ensure that his or her assistive device is operated in a safe and controlled manner at all times.

6.8 Procuring or Acquiring Goods and Services, or Facilities

WNH will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The exception is in cases where it is impracticable to do so.

6.9 Self-Serve Kiosks

WNH will incorporate accessibility features when designing, procuring or acquiring self-service kiosks. WNH will always be aware of the accessibility features of self-service kiosks for persons with disabilities.

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7.0 Information and Communication

WNH will create, provide and receive information and communications in ways that are accessible to people with disabilities.

If WNH determines that it is not technically feasible to convert the information or communications or that the technology to convert the information or communications is not readily available, WNH will be obligated to provide the person that requires the information with an explanation as to why the information or communications are unconvertible; and a summary of the unconvertible information or communications.

7.1 Accessible Formats and Communication Supports

Unless deemed unconvertible, WNH will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

WNH will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

WNH will make the availability of accessible formats and communication supports publicly known.


7.2 Communication with Persons with Disabilities

When communicating with a person with a disability, WNH will do so in a manner that takes the person's disability into account. The individual with a disability may request an accommodation and/or alternate formats to facilitate their interaction with WNH. WNH employees and volunteers who deal with members of the public will work with the individual with a disability to provide a timely and appropriate accommodation and/or alternate format.

7.3 Feedback

WNH allows for a variety of opportunities and methods for customers to provide feedback to WNH including:

- By telephone at 519-886-5090
- By email to customersupport@wnhydro.com
- By way of our website at www.wnhydro.com/contactus
- Through social media
 - Twitter: @wnhydro
 - Facebook: www.facebook.com/wnhydro

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- In writing to:
 - Customer Support
 - Waterloo North Hydro
 - 526 Country Squire Road
 - Waterloo, ON N2J 4G8
- In person at:
 - Waterloo North Hydro
 - 526 Country Squire Road
 - Waterloo, ON N2J 4G8

WNH is committed to providing high quality goods and services to all members of the public it serves. Feedback from the public is welcomed as it may identify areas that require change and encourage continuous service improvements.


WNH will ensure that its process for receiving and responding to feedback (both internal and external) is accessible to customers or employees by providing, or arranging for provision of, accessible formats and communications supports, upon request. WNH will notify the public about the availability of accessible formats and communication supports.

Once the feedback has been received by WNH the following actions/process will be implemented:

- (a) All feedback will be directed to the appropriate contact
- (b) The relevant contact will take appropriate action in a timely manner with the assistance of members of other departments if needed.
- (c) The relevant contact will assess current policies, practices, and procedures to determine if any changes are required.
- (d) The relevant contact will follow up with the person who submitted the feedback within seven (7) business days to communicate all actions taken.
- (e) Documentation of all steps including any discussions with the person submitting the feedback and actions taken for resolution will be retained according to records retention guidelines.

7.4 Accessible Websites and Web Content

WNH will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the Integrated Accessibility Standards, Ontario Regulation 191/11 (IASR), and will refer to the legislation for specific compliance deadlines and requirements.

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7.5 Emergency Procedures, Plans or Public Safety Information

WNH will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, floor plans etc.) is provided in an accessible format or with appropriate communication supports, upon request.

8.0 Employment

8.1 Recruitment, Assessment and Selection

WNH will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, WNH will consult with the applicant and provide for suitable accommodation, where reasonable.

Successful applicants will be made aware of WNH's policies and supports for accommodating people with disabilities.

8.2 Accessible Formats and Communication Supports for Employees

WNH will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, WNH will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.


WNH will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

8.3 Workplace Emergency Response Information

Where required, WNH will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or

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- WNH reviews general emergency response policies.

8.4 Documented Individual Accommodation Plans

WNH will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent for the creation of the accommodation plan;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The ways in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:


- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

8.5 Performance Management and Career Development and Advancement

WNH will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

8.6 Return to Work

WNH will develop and implement return to work processes for employees who

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are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps WNH will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

8.7 Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

8.8 Review

This policy will be reviewed regularly to ensure that it is reflective of WNH's current practices as well as legislative requirements.