
Accessibility Policy and Multi Year Plan

Accessibility Plan and Policy			
Policy Number:	RPRA-Mgmt-HR-003		
Review Frequency:	Every five years	Date Last Reviewed:	January 31, 2024
Responsible Executive:	Chief Financial & Administrative Officer	Date Last Revised:	December 29, 2023

1.0 Statement of Commitment and Guiding Principles

RPRA is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner.

We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

This Accessibility Policy and Plan demonstrates how RPRA will:

- provide training in the requirements of Ontario's accessibility laws and the Ontario Human Rights Code (OHRC) as it applies to people with disabilities.
- provide accessible customer service to people with disabilities
- make our information and communications accessible to people with disabilities
- ensure fair and accessible employment practices

RPRA is committed to meeting its current and ongoing obligations under the OHRC respecting non-discrimination.

RPRA understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the OHRC or obligations to people with disabilities under any other law.

This Accessibility Policy and Plan is guided by the following principles:

- **Dignity** – we will provide service in a way that allows the person with a disability to maintain self-respect and the respect of other people.
- **Independence** – a person with a disability can do things on their own without unnecessary help or interference from others.
- **Integration** – we will provide service 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 others, unless a different way is necessary to enable them to access services or facilities.
- **Equal opportunity** – we will provide service to a person with a disability in such a way that they have an equal opportunity to access our services and facilities as what is given to others.

The term “facility” in this Accessibility Policy and Plan refers to rooms or spaces at RPRA's offices at 4711 Yonge Street, Suite 408, Toronto, or other temporary locations used by RPRA from time to time.

2.0 Training

RPRA is committed to training its employees, directors (in their capacities as board and committee members), and officers on the applicable requirements in the AODA, including the Integrated Accessibility Standards Regulation, and the OHRC as it relates to persons with disabilities.

Training of our employees, directors, and officers on accessibility relates to their specific roles and responsibilities. Training includes:

- purpose of the AODA and the requirements of the Integrated Accessibility Standards Regulation and the OHRC as it relates to people with disabilities
- knowledge and awareness of this Accessibility Policy and Plan
- how to interact and communicate with people with various types of disabilities
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person
- how to use the equipment or devices available on-site or otherwise that may help with providing services to people with disabilities
- what to do if a person with a disability is having difficulty in accessing RPRA's services or facility.

RPRA will train every person as soon as practicable after being hired, elected, or appointed, and RPRA will provide training in respect of any changes to this Accessibility Policy and Plan .

In addition, we will ensure that all persons who participate in developing RPRA's policies, and all other persons who provide services on behalf of RPRA (e.g., external contact centre service providers) receive training about the provision of services to persons with disabilities.

RPRA will maintain records of the training provided, including the dates on which the training was provided, who attended, and how many people took the training.

3.0 Assistive Devices

People with disabilities may use their personal assistive devices when accessing our services, the registry, or our facilities. An assistive device is a piece of equipment a person with a disability uses to help them with daily living (for example, a screen reader, devices that display text from a telephone conversation, a hearing aid, a wheelchair, cane or walker, an oxygen tank).

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other applicable measures will be used to ensure the person with a disability can access our services or facility.

4.0 Service Animals

RPRA welcomes people with disabilities to keep their service animals with them. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. If a staff member cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form)

from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

If service animals are prohibited by another law, RPRA will ensure that an alternative way to access and use RPRA's services or facility will be provided.

5.0 Support Persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

6.0 Notice of Temporary Disruption

In the event of a planned or unexpected disruption to services, including to the registry, our website, or access to our facility, RPRA will notify its registrants and other members of the public promptly through our website, social media channels, and emails to impacted registrants. This notice will include information about the reason for the disruption, its anticipated length of time, and a description of an alternative facility or services, if available.

7.0 Information and Communications

We provide information and communicate with people with disabilities in ways that take into account their disability. When asked, our staff will provide information and communications materials about RPRA and its services in accessible formats or with communication supports in a timely manner and at no additional cost. This includes publicly available information on RPRA's website, the registry, and the hazardous waste program mobile app. Requests can be made by following the steps outlined in section 9.0 (Feedback) of this policy and plan. This Accessibility Policy and Plan is also linked in the footer of the registry.

Staff will consult with the person making the request to determine the most suitable method of communication or accessible format that works for them. If RPRA determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

RPRA's website and web content conform to World Wide Web Content Accessibility Guidelines (WCAG) 2.0 Level AA. Accessible formats and types of communication supports include but are not limited to:

- HTML and Microsoft Word
- accessible audio formats where possible
- large print
- reading the written information aloud to the person directly
- exchanging hand-written notes (or providing a note taker or communication assistant) or emails
- repeating, clarifying, or restating information

8.0 Emergency Procedure

Publicly available emergency and public safety information will be provided in an accessible format or with appropriate communication support, as soon as practicable, upon request. This may include:

- evacuation procedures and floor plans
- information about alarms
- information about other incidents that may threaten life, property, operations or the environment

RPRA's emergency evacuation procedure contains provisions for persons in need of assistance.

9.0 Feedback Process

RPRA welcomes feedback on how we provide services to persons with disabilities and our compliance with accessibility requirements. Feedback will help RPRA identify barriers and respond to concerns.

A person can provide feedback in the accessible manner requested to any staff member or by email to info@rpra.ca or registry@rpra.ca. All feedback will be handled on a case-by-case basis.

You can expect to hear back from RPRA within 10 business days of receipt of the feedback, in the format in which the feedback was received. Feedback will be used to improve RPRA's services.

RPRA has also established a process if you wish to file a formal complaint. [The Formal Public Complaints and Requests for Clarification Policy](#) can be found on RPRA's website.

10.0 Employment

10.1 Recruitment and Assessment

RPRA's career opportunities [website](#) notifies our employees and the public about the availability of accommodations for applicants with disabilities in our recruitment process. RPRA will consult with job applicants who request accommodations to understand the individual's needs so that the accommodations that are provided are effective. When a candidate is selected to participate in an assessment, they will be notified that accommodations are available upon request in relation to the materials or processes to be used.

10.2 Employee Supports

RPRA considers the accessibility needs of employees with disabilities. We will notify successful applicants when making an offer of employment that supports are available for those with disabilities, and we provide updated information to employees when there are changes to existing policies relating to accessibility and accommodations.

RPRA will provide successful applicants and employees with workplace information in an accessible format and/or communication supports if requested. Such information may include RPRA's policies, including our policy for accommodating employees with disabilities, and information employees need to perform their jobs (e.g., job descriptions, the human resources manual, department-specific procedures, training materials) and all communication generally available to all employees.

RPRA will consult with the employees when arranging for the provision of suitable accommodation in a manner that considers the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

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

RPRA will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, during performance management career development/advancement, and redeployment processes.

10.3 Workplace Emergency Response Information

RPRA will provide individualized workplace emergency response information to employees with disabilities. With the employee's consent, RPRA will also provide this information to a designated person if the employee requires assistance during an emergency.

We will provide this information as soon as practicable after we become aware of the need for accommodation due to the employee's disability, and we will review this information when:

- (a) the employee moves to a different location in the organization;
- (b) the employee's overall accommodation needs or plans are reviewed; and
- (c) we review our general emergency response policies.

10.4 Accommodation Plans and Return to Work Process

RPRA has a written process to develop individual accommodation plans for employees with disabilities.

RPRA also has a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. This process outlines the steps RPRA will take to facilitate the employee's return to work and will use the employee's individual accommodation plan as part of that process.

Multi-Year Accessibility Plan

RPRA strives to remove and prevent barriers to accessibility for persons with disabilities who work for or obtain service from RPRA. This plan has been created to track our progress and planned actions to fulfil our requirements under the AODA.

Area	Planned initiatives and outcomes		Timeline/status
Policies and Training	<ul style="list-style-type: none"> • Improve accessibility and awareness of resources for people with disabilities 	<ol style="list-style-type: none"> 1. Develop and maintain an Accessibility Policy and Plan and keep related policies and procedures current. 	Completed; review of Plan required on or before December 31, 2028; Policy will be updated when practices or procedures change.
		<ol style="list-style-type: none"> 2. Incorporate accessibility discussions into joint health and safety committee and diversity, equity, and inclusion committee meetings 	Target: Q2 2024 and on-going.
	<ul style="list-style-type: none"> • Continue to provide required training on Ontario's accessibility laws and the OHRC as it applies to people with disabilities. 	<ol style="list-style-type: none"> 1. Enhance employee training and access to information by requiring updates every two years on topics related to accessibility. 	Target: Q3 2024 and on-going.

Employment Standards	<ul style="list-style-type: none"> • Continue to ensure fair and accessible employment practices • Continue to include the availability of accommodations in job postings and throughout the hiring processes 	1. Further improve on inclusive employment practices in recruitment.	Target: Q1 2024
	<ul style="list-style-type: none"> • Emergency Procedure 	1. Communicate RPRA’s emergency evacuation procedure.	Dec 2023; posted internal website Jan 2024.
		2. To prepare for emergency situations, ensure employees are provided with individualized workplace emergency response information when required.	On-going as required.
	<ul style="list-style-type: none"> • Review and enhance our accommodation process 	1. Ensure return-to-work\redeployment accommodations for persons with disabilities address specific individual needs.	Target: Q2 2024
		2. Educate employees on the process for requesting individual accommodation plans.	

Communications	<ul style="list-style-type: none"> • Continue to make our information and communications accessible to people with disabilities • Ensure any new website content is AODA compliant. 	1. Update website with revised Accessibility Policy and related content.	January 2024
		2. RPRA's website and accessible formats will be monitored and tested as additional content or revisions are made. RPRA will continue working with its external web developers to maintain an accessible website that conforms to WCAG 2.0 Level AA, and to reduce barriers as they are identified.	Completed and On-going
		3. RPRA performed AODA accessibility testing and implemented improvements in partnership with its consultants and the CRM provider (Salesforce) to ensure that the registry and the hazardous waste program mobile app are compliant with AODA requirements. RPRA will monitor and test for continued compliance with AODA when revisions are made.	Completed

Facility	<ul style="list-style-type: none"> • Design 	<ol style="list-style-type: none"> 1. Continue monitoring to ensure office space and meeting rooms meet AODA requirements. 	On-going
		<ol style="list-style-type: none"> 2. Add signage to note location of the Universal washroom to meet current AODA requirements. 	Completed
Procurement	<ul style="list-style-type: none"> • Monitor, review and update information on accessibility within our procurement process 	<ol style="list-style-type: none"> 1. Update service agreement templates. 	Target: Q2 2024
		<ol style="list-style-type: none"> 2. Analyze procurements on a case-by-case basis to ensure accessibility requirements are met. 	On-going