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Pay Equity Office Multi-Year Accessibility Plan, 2025–2027

Introduction

This document outlines the Pay Equity Office's (PEO) multi-year accessibility plan (accessibility plan) for 2025–2027 to:

1. Prevent and remove barriers for persons with disabilities
2. Meet the requirements set out in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

Statement of Commitment

The PEO supports the full inclusion of persons with disabilities as set out in the United Nations' *Convention on the Rights of Persons with Disabilities*, the Canadian *Charter of Rights and Freedoms*, the Ontario *Human Rights Code* (Code), and the *AODA*. The *Code* has primacy over the *AODA*. The PEO is committed to complying with the accessibility standards set out in the *AODA*'s *Ontario Regulation 191/11: Integrated Accessibility Standards* (IASR) and the duty to accommodate disability related needs under the *Code*.

AODA Requirements

IASR under the *AODA* include accessibility standards for:

- Policies, training, plans and reports
- Procurement
- Customer service

- Information and communications
- Employment
- Transportation
- The built environment.

Section 4 of the *IASR* requires the Government of Ontario and designated public sector organizations, including the PEO, to create, maintain and make publicly available a multi-year accessibility plan. The accessibility plan must be created, reviewed and updated in consultation with persons with disabilities. The accessibility plan must also be reviewed at least once every five years, and all organizations are required to report annually on the progress they have made to implement the accessibility plan and comply with the *IASR*. The status reports must be made available to the public.

The Ontario Public Service's 2022–2025 OPS Multi-Year Accessibility Plan describes the OPS' commitment to accessibility, and the steps the government is taking to prevent and remove barriers for persons with disabilities in employment, services and in making policy. The OPS accessibility plan outlines the government's strategies to prevent, identify and remove barriers for persons with disabilities.

For more information:

- A compact summary of accessibility directives and policies: Ontario Public Service accessibility plans and policies | ontario.ca
- How to make customer service accessible: Ontario Public Service Accessible Customer Service Policy

The PEO has considered these requirements and plans in the development of its accessibility plan.

Guiding Principles and Policies

In accordance with section 3 of the *IASR*, and the PEO mandate, we have established and are also guided by our policies and other functions that promote, protect and advance understanding of human rights for people with disabilities.

Building on the statement of commitment, the PEO Multi-Year Accessibility Plan for 2025–2027 outlines the steps the PEO is taking to improve opportunities for people with disabilities.

Application

The PEO accessibility plan applies to:

- All employees, (part-time, full-time, contract, students)
- Visitors, stakeholders, vendors, contractors
- Pay Equity Commissioner
- Advisory group members.

Strategies and Actions for 2025–2027

The PEO is committed to advancing the human rights of persons with disabilities using our mandate, through activities such as public education, policy development, and public inquiries.

The PEO makes the following commitments to meet the goal of being an organization that is fully accessible to persons with disabilities. The PEO's activities will help us comply with the *AODA* and the IASR in the following areas:

- Customer service
- Information and communications
- Employment
- Accessibility training
- Procurement.

Customer Service

In accordance with Part IV.2 of the *IASR*, the PEO is committed to ensuring that all individuals have access to and can effectively use its services, goods and facilities. The PEO has the following in place to meet its obligations and commitments:

- Customer service policy on *Providing goods and services to people with disabilities*, as required by the *IASR.*
- Communications supports such as sign language interpretation and captioning for PEO-hosted public events as required; other forms of accommodation are available upon request.

- All PEO-hosted public events take place at accessible locations or on accessible video conferencing platforms. The PEO takes steps to confirm that each physical and virtual event space is fully accessible before finalizing an event.
- Standard language on all invitations invites people to contact the PEO about additional related accommodation requests before event dates.
- As required under Section 11 of the *IASR*, a web-based feedback process is available to help the PEO better understand how well customer expectations are being met. People can also provide feedback via telephone, TTY, mail or fax.
- The PEO is committed to providing customer service in a way that best respects the dignity and independence of persons with disabilities. The PEO will continue to adhere to its customer service policy on *Providing goods and services to people with disabilities* and the *IASR* by:
    - Ensuring that stakeholders, clients and employees are aware of their roles and responsibilities under this accessible customer service procedure.
    - Promptly addressing accommodation and accessibility issues identified in a dignified and respectful way, to facilitate effective access to, and participation in, PEO services.
    - Responding to identified accommodation and accessibility needs on an individual basis.

In consultation with people with disabilities, the PEO will review and make any necessary changes to improve the accessibility of its:

- Customer service policy and practices in accordance with the standards under the *IASR*, including:
    - Routinely asking individuals if they require any disability-related accommodations or assistance.
    - Reviewing potential barriers that visitors with disabilities may experience when arriving at the PEO's offices, including the accessibility of the current elevator lobby phone, staff phone list and lack of "glass door" reception for visitors with vision and/or hearing loss or other types of disabilities.
    - Clarifying that the customer service policy applies to individuals who use mobility devices.

    - Reviewing potential barriers that individuals who use mobility devices may experience within the PEO's offices, including along internal paths of travel to and within meeting rooms.
    - Informing visitors that the PEO has a quiet room available for persons with disabilities who may require private space to take medication or rest.
- Mechanism/procedure for the PEO to receive *AODA* compliance-related feedback or inquiries, including complaints, in accordance with section 11 of the *IASR*:
    - Including clarifying the process to provide feedback via website, phone, and TTY.

Information and Communications

In accordance with Part II of the *IASR*, the PEO is committed to making sure its information and communications systems and products are accessible to persons with disabilities.

- The PEO takes into account individual disabilities when communicating with people. The PEO will continue to review its digital and other communication methods in an effort to improve accessibility to its services.
- The PEO website is designed to comply with the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0, Level AA.
- The PEO has in place internal emergency procedures and plans, including personalized evacuation plans, with the Persons in Need of Assistance list continuously updated and confidentially shared with the property manager.
- Staff will continue to receive appropriate specialized training on emerging procedures and plans, video conferencing platforms, designing accessible eLearning modules, and other topics to improve the accessibility of the PEO's online resources.
- Staff routinely take steps to make the website and communication products as accessible as possible, including:
    - The tools and products that are used to develop the website and other online materials have built-in accessibility features.
    - Web developers and any other external vendors are selected, in part, based on their experience designing accessible websites.
    - Any online materials, such as eLearning modules, are tested regularly during their development and are tested on an ongoing basis by staff and by external persons with disabilities.

- Captioning and transcripts are provided for all video content.
- The PEO provides local and toll-free TTY numbers for communicating with people who are Deaf, deafened or hard of hearing.
- The PEO uses a range of communication methods such as mail, email, telephone, video conferencing including Internet-based communications platforms, to communicate with stakeholders and members of the public.
- All public documents, including correspondence and publications, are available in accessible digital formats, such as HTML or accessible PDFs, and MS Word document format is available upon request.
- All staff are expected to use plain language to write publications, documents, training materials and correspondence. Assistance with plain language editing is available for all PEO policies and publications.

In consultation with people with disabilities, the PEO will review and make any necessary changes to improve the accessibility of its:

- Website, as it works towards revamping the website design, including but not limited to the accessibility of posted documents in PDF format, and potentially MS Word format, as well as online eLearning modules/videos, including whether any elements of these online products may be causing barriers (e.g. watermarks on documents or music playing in the background of eLearning modules/video).
- Social and other media accounts.
- Other PEO digital information and communications, including email, electronic document formats and distribution, and its audio/video teleconferencing software and practices, including making sure video conferencing participants who require them have access to and know how to use accessibility features such as captioning.
- Other information technology the PEO uses including computer software (e.g. Outlook and VPN access) and hardware (e.g. employee personal computers, telephones, audio-video conferencing equipment).
- Plain language writing at Grade 10 and lower levels for people with reading-related disabilities.
- Emergency procedures, plans and public safety information including making sure staff know what to do when visitors with disabilities are on-site during an emergency.

- TTY phone line, including reviewing current use and best practices, or alternatives, for contacting the PEO office that meet the preferred mode of communication for individuals who are Deaf, deafened or hard of hearing.

Employment

In accordance with Part III of the *IASR*, the PEO is committed to ensuring that the recruitment process for new staff is accessible.

- The PEO is committed to accessible employment practices and policies to attract and retain employees with disabilities. The PEO is also committed to providing accommodation to employees with disabilities in a way that best respects their dignity and allows them to carry out their essential job duties and take part fully and meaningfully in the PEO's work. The PEO also believes that inclusive design and integration are preferable to individual accommodations, where possible.
- The PEO informs candidates and employees about their right to accommodation and will advise candidates about the type of testing that they will be expected to do during the interview process, so that candidates can request an appropriate accommodation for a disability if need be.
- The PEO follows the OPS Employee Accommodation and Return to Work Guidelines and Operating Policy for developing and documenting individual accommodation plans, return-to-work plans, and workplace emergency response information for employees with disabilities.
- New PEO employees receive information and training on employees' rights and responsibilities under the *AODA* and OPS policies that foster an inclusive workplace. These include the PEO's customer service policy on *Providing goods and services to people with disabilities* and commitment to promote a scent-sensitive office space.
- The PEO will continue to adhere to OPS policies and procedures on employment accommodation for both current and prospective employees with disabilities, as well as the standards outlined in the *IASR*.
- The PEO has an accessible quiet room for staff and visitors, which improves accessibility for persons with disabilities who may require private space to take medication or rest, for example. It improves accessibility for staff and visitors based on creed. It also improves accessibility for women who are breastfeeding.

In consultation with people with disabilities, the PEO will review and make any necessary changes to improve the accessibility of its employment policies and practices (e.g. employee

recruitment, accommodation procedures and plans) in accordance with Part II of the *IASR* as well as Ontario Public Service policies including making sure time limits for recruitment tests are designed inclusively and do not generally adversely affect candidates with disabilities, and accommodations are available to meet the disability-related need for more time.

Accessibility Training

In accordance with sections 3 and 80.49 of the *IASR*, the PEO is committed to making sure that all staff and the Pay Equity Commissioner remain informed about their rights and responsibilities under the *AODA* and the *IASR* by providing ongoing training.

- All PEO staff and the Pay Equity Commissioner receive ongoing training on disability-related policies and procedures, including *AODA* mandatory training on the requirements of the accessibility standards under the *IASR*, and as it pertains to persons with disabilities. All current staff have completed the eLearning modules.
- The PEO will train staff or volunteers, as appropriate to their duties, on the requirements of the *IASR* and the Ontario Human Rights Code as it pertains to people with disabilities.
- The PEO has an internal guide on plain-language writing and staff have been trained on plain-language writing. In addition to providing ongoing training to staff, as part of its mandate, the PEO will continue to offer training on disability and the duty to accommodate to the public.
- In accordance with the OPS requirements, the PEO will track staff and the Pay Equity Commissioner's training on accessibility and the duty to accommodate for disability and other grounds of the Ontario Human Rights Code.

In consultation with people with disabilities, the PEO will review and make any necessary changes to improve its staff and Commissioner's training on *IASR* requirements, including making sure:

- New staff receive information and training on the PEO and OPS inclusive workplace policies.
- Current staff receive refresher training on the *AODA*, including the accessible customer service requirements.
- Relevant staff receive regular training on evolving best practice standards for accessible website design and online resources.
- All staff receive refresher training on plain-language writing at Grade 10 and lower levels.

Procurement

In accordance with section 5 of the *IASR*, the PEO is committed to incorporating accessibility design, criteria and features when procuring or acquiring goods, services or facilities.

- The PEO will continue to comply with the procurement standard in the *IASR* and the accessibility obligations in the Ontario Public Service Procurement Directive Issued by Management Board of Cabinet in December 2014.
- The PEO will identify accessibility requirements in project terms of reference, requests for proposals and contracts with third-party service providers.
- Where necessary, staff with disabilities will be consulted about any accessibility considerations at the outset of the procurement, so that they are included in the contract.

In consultation with people with disabilities, the PEO will review and make any necessary changes to improve the accessibility of its procurement practices.