



AODA Integrated Accessibility Standards Regulation— Information and Communications Standards Policy

Intent

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Information and Communications Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of information and communication services and materials for people with disabilities.

All information and communications materials and services provided by LMC Diabetes & Endocrinology Ltd. ('LMC') shall follow the principles of dignity, independence, integration and equal opportunity.

Scope

This policy governs all employees [salaried employees, hourly employees, temporary employees, Managers, and/or Directors] working for LMC Diabetes & Endocrinology Ltd, LMC Clinical Research Inc., LMC Early Stage Development and LMC Pharmacy ('LMC').

This policy shall apply to every person who deals with members of the public or their agents on behalf of LMC, whether the person is an employee, agent, volunteer or otherwise.

Definitions

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

Communication Supports – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready – an electronic or digital format that facilitates conversion into an acceptable format.

Extranet Website – a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.

Information – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.

Internet Website – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.

Intranet Website – an organization's internal website that is used to privately and securely share any part of the organization's information or operational systems within the organization and includes extranet websites.



Support Person – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs, or with access to goods, services or facilities.

Web Content Accessibility Guidelines – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

General Principles

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Education and Training Resources
- E. Public Libraries
- F. Emergency Procedures, Plans or Public Safety Information
- G. Exceptions
- H. Feedback

A. General Requirements

General requirements that apply across all of the three standards, *Information and Communications, Employment and Transportation* are outlined as follows.

Establishment of Accessibility Policies and Plans

LMC will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. LMC is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This should be achieved through documentation in LMC’s policies and making these documents publicly available, in an accessible format upon request.

LMC will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. LMC will post its accessibility plans on their website, if any, and provide the plan in an accessible format upon request. LMC will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement LMC’s accessibility plan and post this status on its website. If requested, the report shall be created in an accessible format.



Procuring or Acquiring Goods and Services, or Facilities

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

Training Requirements

LMC will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing LMC's policies, and all other persons who provide goods, services or facilities on behalf of LMC.

B. Accessible Formats and Communication Supports

LMC will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. LMC will take into account the person's accessibility needs when customizing individual requests.

C. Accessible Websites and Web Content

All departments governed by LMC will make its web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. Web content includes any information which resides on an internet or intranet web site.

D. Emergency Procedures, Plans or Public Safety Information

All obligated organizations who prepare public emergency procedures, plans or public safety information are responsible for providing the information in an accessible format or with appropriate communication supports as soon as practicable, upon request.

E. Exceptions

The *Information and Communications Standard* does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:

- a. An explanation as to why the information or communications are unconvertible;
- b. A summary of the unconvertible information or communications;
- c. Information is regarding as *unconvertible* if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.



F. Feedback Process

Every obligated organization which has processes in place for receiving and responding to feedback must ensure these processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request. LMC should notify the public about the availability of these accessible formats.

Administration

If you have any questions or concerns about this policy or its related procedures please contact:

- Human Resources
- 416 645 2928
- 1929 Bayview Ave. Suite 106 Toronto, ON, M4G 3E8
- www.lmc.ca

This policy and its related procedures will be reviewed as required in the event of legislative changes.

Acknowledgement & Agreement

I, (Employee Name), acknowledge that I have read and understand the AODA Integrated Accessibility Standards Regulation Policy, Information & Communications Standard of LMC. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____



Referenced Documents

- Accessibility for Ontarians with Disabilities Act, 2005
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm#BK19
- Integrated Accessibility Standards, Ontario Regulation 191/11
http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK0
- Ministry of Community and Social Services, *Making Ontario Accessible* (Access ON)
<http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/index.aspx>
- Ontario Human Rights Code, 1990
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm
- WWW Consortium Web Content Accessibility Guidelines 2.0
<http://www.w3.org/WAI/intro/wcag>