

Policy:	Accessibility for Persons with Disabilities
Pearson Company:	Pearson Canada
Issue Date:	January 2012
Revision Date:	January 2014

### **Purpose**

The *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* aims to establish standards that provide Ontarians with disabilities the same opportunity of access to and benefit from goods, services, facilities, accommodation and employment as are provided to other persons. The AODA applies to Pearson Canada. Regulations established under the AODA are being phased in and become effective over a period of years.

The purpose of this policy is to establish Pearson Canada's commitment to complying with the AODA and its accessibility regulations. The policy includes regulations relevant to Pearson Canada and will be updated as new regulations come into effect.

### **Policy**

Pearson Canada is committed to applying the principles and regulations of the AODA to our daily operations and to expanding access and support to all customers, employees and visitors with disabilities, by having as our goal a barrier-free environment to enable our customers access to our products and services and our employees employment success.

To ensure AODA obligations are achieved Pearson Canada complies with the Accessibility Guidelines in this policy. Pearson Canada uses reasonable efforts to ensure its policies, practices and procedures address the AODA standards in our daily operations and that they are consistent with the key principles of dignity, equal opportunity, independence, and integration.

This policy applies to all employees, volunteers or persons who represent Pearson Canada, and to all organizational activities, functions and premises. The Accessibility Guidelines in this policy are consulted on to determine the specific scope of application.

### **Responsibilities**

Managers and supervisors are responsible for participating in training related to this policy and for compliance with the principles and regulations of the AODA as set out in this policy.

All employees are responsible for being aware of this policy and for participating in training related to this policy and for applying the principles and regulations of the AODA.

### **Compliance with AODA Accessibility Standards**

The guidelines are based on the Accessibility for Ontarians with Disabilities Act 2005 (AODA), Ontario Regulation 429/07, and the Integrated Accessibility Standards Regulation 191/11.

To help organizations identify, prevent and remove barriers to accessibility, the AODA sets out General Requirements as well as Accessibility Standards in five keys areas of daily living including:

- Customer Service
- Information and Communication
- Employment
- Transportation
- Built Environment

Pearson Canada will follow and comply with the standards which are relevant to our business and commits to ensure operational policies and procedures are developed under the AODA standards and compliance requirements.

The purpose of these guidelines is to inform employees, customers and others of the means by which Pearson Canada achieves its commitment to fully comply with AODA and its Accessibility Standards.

### **AODA General Requirement Guidelines**

Pearson Canada ensures that AODA General Requirements are met by:

1. Establishing an Accessibility policy and guidelines
2. Developing a multi-year Accessibility Plan
  - Pearson Canada has established and implemented a multi-year accessibility plan which is available on the Pearson Canada website. The purpose of this document is to outline the strategy to prevent and remove barriers. The plan is reviewed and updated every five years. An accessible version is provided on request to the Human Resources Department.
  - Pearson Canada prepares an annual status report on the progress of measures taken to implement the strategy.
3. Incorporating accessibility when procuring goods, services and facilities
  - Pearson Canada incorporates accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practicable to do so.
4. Training of employees and other persons
  - Pearson Canada provides training on the requirements of the Customer Service Accessibility Standards, Integrated Accessibility Standards and on the Human Rights Code as it pertains to persons with disabilities to:
    - all employees and volunteers; and
    - all other persons who provide goods, services or facilities on behalf of the organization.
  - Pearson Canada keeps a record of the training provided including the dates on which the training is provided and the number of individuals to whom it is provided through the Company's online learning management system.

### **Customer Service Standards**

The Customer Service Standard applies to the provision of goods and services to members of the public (i.e. customers) and other third parties.

Pearson Canada ensures that AODA Customer Service Standard requirements are met by:

- Pearson Canada has established policies, practices and procedures on providing goods or services to people with disabilities
- Customers or employees can use their own personal assistive devices to access goods and services and to use services
- Pearson Canada will communicate with a person with a disability in a manner that takes into account his or her disability
- Pearson Canada allows people with disabilities to be accompanied by their Guide Dog or Service Animal in areas that are open to the public, unless the animal is excluded by law; or, if a Service Animal is excluded by law, by using other measures to provide services to the person with a disability;

- Pearson Canada permits people with disabilities who use a Support Person to bring that person with them while accessing goods or services in premises open to the public or third parties;
- Where admission fees are charged, Pearson Canada will provide notice ahead of time on what admission, if any, would be charged for the Support Person of a person with a disability;
- Pearson Canada will provide notice when facilities or services that people with disabilities rely on to access or use our goods or services are temporarily disrupted; Pearson Canada will provide notice of the reason, the expected duration and available alternatives if any;
- Notice may be by recorded message, posted on the Pearson Canada website or other reasonable means in the circumstances;
- Pearson Canada has provided training to employees, volunteers and others who interact with the public or other third parties on behalf of Pearson Canada on the topics outlined in the Customer Service Standard;
- Pearson Canada accepts feedback from customers and employees in any format that is accessible to the individual including by phone, email at [Accessibility@PearsonCanada.com](mailto:Accessibility@PearsonCanada.com), written or in person. Any feedback collected by the Human Resources Department will be directed to the appropriate person who can take action. All persons providing feedback will be responded to in a timely and accessible manner.

### **Information and Communication Standards**

The Information and Communication Standard applies to information and communication to all employees, customers and third parties interacting with Pearson Canada.

Exceptions:

The information and communications standards do not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that Pearson Canada does not control directly or indirectly through contractual relationship.

Pearson Canada ensures that AODA Information and Communications Standards are met by:

- Making feedback mechanisms accessible;
- Pearson Canada accepts feedback from customers and employees in any format that is accessible to the individual including by phone, email, written or in person.
- Making information accessible to the public;
- Pearson Canada, upon request, provides or arranges for the provision of Accessible Formats and Communication Supports for persons with Disabilities, in a timely manner that takes into account the person's accessibility needs due to disability; and at a cost that is no more than the regular cost charged to other persons.
- Pearson Canada consults with the person making the request in determining the suitability of an Accessible Format or Communication Support.
- Pearson Canada notifies the public about the availability of Accessible Formats and Communication Supports via the Accessibility page on the Pearson Canada website.

- If Pearson Canada determines that Information or Communications are unconvertible, the organization provides the person requesting the Information or Communication with:
  - An explanation as to why the Information or Communications are unconvertible; and
  - A summary of the unconvertible Information or Communications.
- Making emergency information accessible to the public;
- Pearson Canada prepares emergency procedures, plans or public safety information and makes the Information available to the public via Pearson Canada website, signage throughout Pearson Canada.
- If required to evacuate, Pearson Canada ensures that individuals with disabilities are able to exit our facilities safely. Pearson Canada provides the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request. Requests for accessible formats should be made to [Accessibility@PearsonCanada.com](mailto:Accessibility@PearsonCanada.com).
- Pearson Canada provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability. A Personal Emergency Plan (PEP) can be requested through the employee's Human Resources Business Partner. The Personal Emergency Plan will be stored in the Human Resources office.
- Making the website accessible in accordance with the legislated schedule:
  - Pearson Canada makes their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, to websites and web content, including web-based applications, that Pearson Canada controls directly or through a contractual relationship that allows for modification of the product; and to all web content published on a website.
- Producing accessible educational and training materials.

### **Employment Standards**

The Employment Standard applies to all applicants, candidates and employees of Pearson Canada.

Pearson Canada ensures that AODA Employment Standards are met by developing specific practices to:

- Make hiring accessible;
- Advise employees about policies for supporting employees with disabilities;
- Make information accessible to employees;
- Develop accommodation plans for employees with disabilities upon request;
- Assist employees with disabilities in return to work; and
- Make performance management, career development and job changes accessible to employees.

### **Built Environment Standards**

Pearson Canada ensures that the design of public spaces standards is met by developing specific practices to:

- Follow accessibility requirements when embarking on the design of public spaces newly constructed or redeveloped on or within Pearson Canada property:
  - recreational trails
  - outdoor use eating areas
  - exterior paths of travel
  - Accessible parking

## **Definitions**

### Disability:

- a) 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 service animal or on a wheelchair or other remedial appliance or device,
- b) a condition of mental impairment or a developmental disability,
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- d) a mental disorder, or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

## **Customer Service Standards**

**Customer:** A member of the public or other third party to whom Pearson Canada provides goods or services.

**Dignity:** The state of being worthy of respect. Pearson Canada treats persons with disabilities with dignity so as to permit the person to maintain self-respect and the respect of other people.

**Guide Dog:** An animal as defined in section 1 of the Blind Persons' Rights Act.

**Independence:** A state of being that exists when a person with disabilities is allowed to do things on their own without unnecessary help or interference from others.

**Service Animal:** An companion animal for a person with disabilities where: it is readily apparent that the animal is used by the person for reasons relating to the disabilities; or, the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disabilities.

**Support Person:** Relating to a person with disabilities, means another person who accompanies the person with disabilities in order to help with communication, mobility, personal care or medical needs, or with access to goods or services.

## **Integrated Accessibility Standards**

**Accessible Formats:** May include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with Disabilities.

**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 communication.

**Communication:** The interaction between two or more persons or entities, or any combination of them, where Information is provided, sent or received.

**Conversion Ready:** An electronic or digital format that facilitates conversion into an accessible format.

**Information:** Data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Kiosk:** An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

**Communications:** The interaction between two or more persons or entities, or any combination of them, where Information is provided, sent or received.

**Conversion Ready:** An electronic or digital format that facilitates conversion into an accessible format.

**Information:** Data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**Extranet Website:** A controlled extension of the intranet, or internal network of an organization to outside users over the Internet.

**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 is accessible to the public.

**Intranet Website:** An organization's internal website that is used to share privately and securely any part of the organization's Information or operational systems within the organization and includes Extranet Websites.

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

**Web Content Accessibility Guidelines:** The World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0."

**Web Page:** A non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent.