

## **HRM 26.0 ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT (AODA)**

### **HRM 26.1 GENERAL REQUIREMENTS UNDER THE INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR)**

The Integrated Accessibility Standards Regulation (IASR) establishes accessibility standards for information and communications, employment, and built environment. The Children's Aid Society of the United Counties of Stormont, Dundas and Glengarry ["the Society"] is included in the regulation's definition of an "obligated organization" and must comply with the phased-in requirements of the regulation beginning January 1, 2012.

#### **DEFINITIONS**

**"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.

**"Accommodation"** means the special arrangements made or assistance provide so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

**"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 communications.

**"Communications"** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

**"Dignity"** means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

**"Equal Opportunity"** means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

**"Independence"** means when a person is able to do things on their own without unnecessary help or interference from others.

**"Information"** includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that convey meaning.

**"Integration"** means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals, unless an alternate measure is necessary to enable the individual to access goods or services.

**"Reasonable Efforts"** means taking approaches that meet the required needs of the individual.

### **HRM 26.1 (A) STATEMENT OF ORGANIZATIONAL COMMITMENT**

#### **POLICY**

The Society is committed to:

- Working towards begin compliant with all standards under the AODA as they are introduced and become law;

- The principles of independence, dignity, integration, and equality of opportunity described in the AODA and to meeting the needs of people with disabilities, in a timely manner, through the implementation of this policy;
- Establishing, maintaining and implementing policies as well as associated practices and procedures in the IASR, specifically in the areas of information and communications and employment, and to meet the accessibility needs of people with disabilities in a timely manner;
- The establishment, implementation, maintenance, and documentation of a multi-year accessibility plan.

## **SCOPE**

This policy applies to the Society's customers, employees, volunteers, applicants for employment, visitors, contractors and subcontractors engaged by the Society, and any other third party providing goods, services or facilities on the Society's behalf.

## **RESPONSIBILITY**

The Accessibility Advisory Committee established by the Society is responsible for the administration of this policy. It is the responsibility of this committee to ensure the application of this policy and that the organization achieves compliance with the law.

Management is responsible for ensuring that all employees follow the guidelines set out in this policy and for ensuring that all employees are trained under the IASR, the *Human Rights Code*, and all related policies, practices and procedures.

All employees, volunteers, contractors and subcontractors, any person acting on behalf of the Society, and any persons involved in the creation of the Society's policies are responsible for adhering to and following the commitments set out in this policy.

## **PROCEDURES**

The Society, through its Accessibility Advisory Committee, will monitor and evaluate accessibility initiatives and changes to applicable legislation and/or regulations. Changes to policies, plans and initiatives will be incorporated as required. The Society will also report on performance in relation to established accessibility goals and targets, as required.

## **HRM 26.1 (B) MULTI-YEAR ACCESSIBILITY PLAN**

### **POLICY**

The Society is committed to the establishment, implementation, maintenance, and documentation of a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the IASR.

### **SCOPE**

This policy applies to all employees and facilities of the Society in Ontario.

## **RESPONSIBILITY**

It is the responsibility of the Society to:

- Assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for persons with disabilities;
- Address the identified barriers and develop a five-year plan for the removal and prevention of these barriers;
- Post the plan in a visible place on the premises and on its website;
- Provide all information relating to the plan in alternative formats upon request;
- Review and update the plan at least once every five years.

It is the responsibility of the Accessibility Advisory Committee to:

- Identify and understand structures, laws, rules, policies, programs, practices and services of, or applicable to, the organization regarding accessibility and barriers to access that people with disabilities may encounter;
- Ensure the Society meets its obligations under the AODA to develop a multi-year accessibility plan and other requirements as required under the law;
- Develop and implement an accessibility plan that includes the identification and prioritization of barriers that need to be addressed and an annual action plan to eliminate barriers;
- Evaluate the progress made toward achieving objectives as per AODA target dates and completion dates;
- Update the multi-year accessibility plan and make it available to the general public;
- Act as the Society's ambassador in the elimination of barriers and promotion of accessibility;
- Communicate all documents to members of the Society's staff and ensure they are trained on accessibility issues and the policies and plans as required by law;
- Prepare and submit any necessary reports to the Board of Directors and the government;
- Examine and monitor progress to ensure the plan is being implemented accordingly and make adjustments at least two times a year.

## **PROCEDURE**

A multi-year plan has been developed and approved and is available upon request from the Human Resources Department.

## **HRM 26.1 (C) ACCESSIBILITY AND HUMAN RIGHTS TRAINING**

### **POLICY**

The Society is committed to the training of all employees, volunteers, persons who deal with customers and the public on the Society's behalf, and persons participating in the development and approval of the Society's policies, practices and procedures on the requirements under the IASR and the *Human Rights Code* as it pertains to persons with disabilities.

Training will be provided as soon as practicable after an individual assumes responsibilities related to the public or a task under the standards.

## **SCOPE**

This policy applies to all employees and facilities of the Society in Ontario.

## **PROCEDURES**

Training will be provided to all current employees who work with the public or who have tasks or responsibilities under any of the AODA standards immediately.

All new employees who work with the public or employees who assume new job responsibilities who have tasks or responsibilities under any of the AODA standards will be trained within sixty (60) days of commencing employment.

All employees will be trained on an on-going basis when changes are made to the policies, practices and procedures and the law.

The Society is required to keep training records under the AODA Regulations. The training records to be maintained shall include the date on which training was provided, the type of training, and participants' names. If a quiz is given to test knowledge, such documents will also be retained. All training records shall be kept in a centralized binder, as well as on the employees' personnel file.

## **HRM 26.2 ACCESSIBILITY FOR PERSONS WITH DISABILITIES: CUSTOMER SERVICE STANDARD**

### **POLICY**

The Society is committed to ensuring that persons with disabilities are provided equal opportunities and standards of service in accordance with the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* by eliminating barriers and improving accessibility for persons with disabilities in a manner that respects dignity, independence, integration and equal opportunity.

The Society recognizes the diverse needs of persons within the communities we serve and will respond by providing services and facilities that are accessible to everyone.

This policy shall apply to every person who deals with a member of the public including all employees, Board members, volunteers, resource parents, contractors and others who deal with the public or other third parties on behalf of the Society.

## **HRM26.2 (A) PROVIDING SERVICES TO PEOPLE WITH DISABILITIES**

The Society will carry out its functions and responsibilities in the following areas:

### **1. Communication**

- a. The Human Resources Department ensures that all employees, Board members, volunteers, resource parents, contractors and others who deal with the public or other third parties on the Society's behalf, receive training on how to effectively interact and communicate with clients with various types of disabilities.

### **2. Telephone Services**

- a. Employees, Board members, volunteers, resource parents, contractors and others who deal with the public or other third parties on the Society's behalf are expected to be familiar with telephone technologies intended for people with disabilities.

### **3. Assistive Devices**

- a. Employees, Board members, volunteers, resource parents, contractors and others who deal with the public or other third parties on the Society's behalf are expected to be familiar with various assistive devices that may be used by people with disabilities while accessing Society services.
- b. Assistive devices owned and operated by the Society will be available for use by persons with disabilities. Available assistive devices and the procedure for accessing them are outlined in the Assistive Device Procedure, attached as Appendix A.
- c. It is the responsibility of the person with a disability to ensure that their assistive devices are operated in a safe and controlled manner at all times.

### **4. Billing**

- a. The Finance department provides invoices/receipts upon request (i.e. hard copy, large print, e-mail) and also answers any questions about the content of the invoice in person, by telephone or e-mail.

### **5. Service Animals**

- a. Persons with disabilities are permitted to be accompanied by their service animal and are able to keep the animal with them in areas/premises that are open to the public when accessing services provided by the Society, unless the animal is otherwise excluded by law.
- b. A service animal is not permitted where food preparation is being undertaken or as otherwise disallowed by law (i.e. laws restricting certain animal breeds).
- c. If a service animal is excluded by law; the Society ensures alternate means are available to enable the person with a disability to obtain, use or benefit from the Society's services.
- d. In the event an employee or client is allergic to a service animal, the Society will make alternative arrangements to allow for the person with a disability to attend a meeting with their service animal.
- e. It is the responsibility of the person with the disability to keep their service animal in control at all times.

- f. For specific information related to service animals see the Service Animal Procedure attached as Appendix B.

## **6. Support Persons**

- a. Persons with disabilities are permitted to be accompanied by their support person in areas/premises that are open to the public, when accessing services provided by the Society. The Society shall ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.
- b. If there is confidential information to be disclosed, consent must be received from the person with the disability and a consent form must be signed to share information while the support person is present.
- c. If there are costs associated with a support person attending a Society sanctioned/sponsored event or training session, the Society will provide notice and may cover a portion of the cost for the event.
- d. For specific information related to support persons see Appendix C of this policy, entitled "Support Persons Procedure".

## **7. Notice of Temporary Disruption**

- a. Property Coordinators make reasonable efforts to provide clients with notice in the event of a disruption in the facilities or services potentially used by people with disabilities, including information about the reasons for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.
- b. The notice will be placed as soon as possible at visible places on the premises and on the SharePoint and website.

## **8. Training**

- a. The Human Resources Department coordinates and will endeavor to ensure that *AODA* training material is provided to all employees, Board members, volunteers, resource parents, contractors and others who deal with the public or other third parties on the Society's behalf to fulfill obligations under the *Act*.
- b. Training is provided to new employees, students, Board members, volunteers and resource parents, contractors and others who deal with the public or other third parties on the Society's behalf, as part of their orientation, and on an ongoing basis when changes are made to these policies, practices and procedures.
- c. A training record will be maintained by the Human Resources Department for all Society employees who have attended the training and includes when the training was completed. Training Records of all other persons inclusive to volunteers, resource parents, Board members, contractors and others who deal with the public or other third parties on the Society's behalf will be maintained by the appropriate departmental parties responsible for providing the training in accordance with requirements of the *Act*. The training will cover the following:
  - Purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*
  - Requirements of the *Accessibility Standards for Customer Service (Ontario Regulation 429/07)*

- Society's policies, practices and procedures relating to the customer service standard.
- Interaction and communication with people with various types of disabilities.
- Actions if a person with a disability is having difficulty in accessing Society's services.
- Interaction with people with disabilities who use assistive devices or require the assistance of a service animal or a support person.
- Use of equipment or devices available through the Society that may help with the provision of services to persons with disabilities.

## **9. Feedback Process**

- a. The Society maintains a feedback process to enable members of the public to comment regarding the Society provision of services to people with disabilities. They may provide feedback in a manner that is easiest for them. Specific information related to our feedback process can be found in the Feedback Process Procedure attached as Appendix D.
- b. All feedback is directed to the Human Resources Department. The Human Resources Department provides a response no later than fourteen (14) business days of receipt of such feedback in a format that takes into account the informant's disability and will outline actions deemed appropriate.
- c. All feedback is logged for reporting purposes and is kept in strict confidence and used to improve service.

## **APPENDIX A**

### **The Children's Aid Society of Stormont, Dundas & Glengarry**

#### **Assistive Devices Procedure**

##### **Addendum to 26.2 - Accessibility for Persons with Disabilities: Customer Service Standard Policy**

The Children's Aid Society of Stormont, Dundas & Glengarry recognizes the diverse needs of persons within the communities we serve and will respond by providing services and facilities that are accessible to everyone by:

1. Allowing a person with disabilities to use their own assistive devices to access services or provide them with access to available assistive devices upon request.
2. Respecting personal assistive devices, by not touching or handling the assistive device without permission. If permission is received, use the following guidelines:
  - Do not move items or equipment, such as canes and walkers, out of their reach
  - Inform the person about accessible features in immediate environment (automatic doors, accessible washrooms, etc.)

#### **Commonly used Assistive Devices:**

##### **Vision Loss:**

- Digital audio player – enables people to listen to books, directions, art shows, etc.;
- Magnifier – makes print and images larger and easier to read;
- Portable global positioning systems (GPS) – helps orient people to get to specific destinations;
- White cane – helps people with visual impairment find their way around obstacles;

##### **Deaf, Deafened, Oral Deaf, Hard of Hearing:**

- FM transmitter system or other amplification devices – boosts sound closest to the listener while reducing background noise;
- Hearing aid – makes sound louder and clearer;
- Teletypewriter (TTY) – helps people who are unable to speak or hear to communicate by phone. The person types their messages on the TTY keyboard and messages are sent using telephone lines to someone who has a TTY, or to an operator (Bell Relay Service) who passes the message to someone who does not have TTY.

##### **Physical Disabilities:**



- Mobility device (e.g. Wheelchair, scooter, walker, cane, crutches) – helps people who have mobility challenges
- Personal oxygen tank – helps people breathe.
- Mechanical Lift.

**Learning Disabilities:**

- Electronic notebook or laptop computer – used to take notes and to communicate;
- Personal data managers – stores, organizes and retrieves personal information;
- Mini pocket recorders – records information for future playback.

**Intellectual/Developmental Disabilities:**

- Communication boards (e.g. Bliss board) – communicate by pointing to symbols, words, or pictures;
- Speech generating devices – communicate using a device that ‘speaks’ when a symbol, word or picture is pressed.

Assistive devices owned by the Society are available to assist with serving a person’s needs while utilizing the services offered by the Society, as listed below:

| <u>Assistive Device</u> | <u>Instructions</u>   | <u>Location</u> |
|-------------------------|---|-----------------|
| <b>Wheelchair</b>       | -Wait for and follow the person’s instructions;<br>-Confirm that the person is ready to move;<br>-Describe what you are going to do before you do it;<br>-Avoid uneven ground and objects that create a bumpy and unsafe ride;<br>-Practice consideration and safety – don’t leave the person in an awkward, dangerous or undignified position such as facing a wall or in the path of opening doors. | First Aid       |
| <b>TTY</b>              | - Contact Human Resources for instruction   |                 |

## Appendix B

### **Children's Aid Society of Stormont, Dundas & Glengarry**

#### **Service Animals Procedure**

##### **Addendum to 26.2 - Accessibility for Persons with Disabilities: Customer Service Standard Policy**

The Children's Aid Society of Stormont, Dundas & Glengarry recognizes the diverse needs of persons within the communities we serve and will respond by providing services and facilities that are accessible to everyone by:

1. Permitting service animals to accompany persons with disabilities which includes keeping the animal with them in areas/premises that are open to the public when accessing services provided by the Society.
2. Informing a person with a disability accompanied by a service animal that they are responsible to maintain care, supervise and control the animal at all times.

In a circumstance where the person is unable to gain control of their service animal:

- Allow the person an opportunity to gain control and rectify the situation. If the service animal is acting aggressively, the owner will remove the animal from the situation and/or area of concern until such time that control is resumed and service provision can continue.

A service animal is an animal that is being used because of a person's disability and this is either readily apparent or is supported by a letter from a regulated health professional, or an identification card from the Ministry of the Attorney General.

- Guide dogs are specially trained to assist a person who is blind.
- Service animals are animals that are specially trained to assist a person with a disability. They might open doors, pick up items, predict seizures, alert to sounds, etc. Service animals may be a dog or another type of animal.
- Service animals are not pets – they are working animals. Employees are not to pet, make eye contact with or talk to a service animal.
- Service animals provide a necessary service; they are allowed to be with their owner at all times, unless otherwise prohibited by law.

When serving a person who has a service animal and there is another person present who has an allergy to animals, accommodations will be made that meets the needs of all parties.

Service animals are not permitted:

- Where food preparation is being undertaken.
- As otherwise disallowed by law (i.e. laws restricting certain animal breeds - Pit Bulls).

Where a law excludes the service animal from our premises, employees are required to provide alternatives to enable the client to access our services which may include:

- Provide services to the person in a part of the premises where the animal is not restricted;
- Work with the individual to find a mutually agreeable solution (i.e. Determine another method of service).

If it is not apparent that an animal is a service animal, employees may ask the person for a letter from a regulated health professional or an identification card from the Ministry of the Attorney General confirming that the person requires the animal for reasons related to a disability.

The following chart lists some types of service animals, key tasks they perform and those who use service animals.

| <b>Service Animal</b>   | <b>Key Tasks</b>  | <b>Users</b>  |
|---|---|---|
| Autism assistance or service dog  | <ul style="list-style-type: none"> <li>• Keeps a child from running into danger and provides assistance when sensory stimulus is heightened. Dog is attached to the child's waist by a belt and a leash held by an adult</li> </ul> | People with autism or other developmental/intellectual disabilities |
| Guide dog, dog guide or seeing eye dog  | <ul style="list-style-type: none"> <li>• Follows directions of owner, alerts owner to changes in elevation (e.g., curbs, stairs) and obstacles</li> </ul>   | People with vision loss   |
| Hearing ear, hearing, sound alert or hearing alert dog, cat or animal                                     | <ul style="list-style-type: none"> <li>• Alerts owner to sounds often by a nudge or pawing and leads him/her to the source of the sound.</li> <li>• May use a special signal to alert owner to fire alarm</li> </ul>                | People who are Deaf, oral deaf, deafened or hard of hearing         |
| Psychiatric service dog   | <ul style="list-style-type: none"> <li>• Retrieves and prompts the person to take medicine, retrieves or activates medical alert, leads person out of crowds, etc.</li> </ul>   | People with mental health disabilities                              |
| Service or mobility dog or animal, special skills dog or animal<br><br>(Small ponies or miniature horses) | <ul style="list-style-type: none"> <li>• May pull wheelchairs, carry objects, pull items, turn handles or push buttons such as door openers. Larger dogs may provide balance support.</li> </ul>                                    | People with physical disabilities                                   |
| Seizure, seizure alert, seizure assist or seizure response dog or animal                                  | <ul style="list-style-type: none"> <li>• Steers owner from danger during a seizure, activates medical alert</li> <li>• Can alert owner to an oncoming seizure</li> </ul>  | People who have epilepsy or other seizure disorders                 |

## Appendix C

### **The Children's Aid Society of Stormont, Dundas & Glengarry**

#### **Support Persons Procedure**

##### **Addendum to 26.2 - Accessibility for Persons with Disabilities: Customer Service Standard Policy**

###### **Definition:**

A support person is an individual hired or chosen to accompany a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or access to goods and services. The support person can be a paid personal support worker, volunteer, friend or family member. He or she does not necessarily need to have special training or qualifications.

The Children's Aid Society of Stormont, Dundas & Glengarry recognizes the diverse needs of persons within the communities we serve and will respond by providing services and facilities that are accessible to everyone by:

- Allowing a person with a disability to be accompanied by his/her support person while in areas of the premises that are open to the public. Determine the identity/role of the support person however direct communication is to be with the client.

###### **When the Society Requires a Support Person to be present:**

Employees may deem it necessary to recommend to their client that they should be accompanied by a support person in order to fully access service.

In determining whether a client with a disability requires the accompaniment of a support person, the following criteria are used in consultation with the client and team supervisor:

- There is a significant health and safety risk and the assessment of the risk is based on consideration of the duration of the risk, the nature and severity of the potential harm, the likelihood that the potential harm will occur, and the imminence of the potential harm;
- The risk cannot be eliminated or reduced by other means;
- Those situations where, without a support person present, the client may not be able to fully comprehend and/or participate in the service being offered.

If there are costs associated with a support person attending an Society sanctioned/sponsored event or training session, the Society provides notice and may cover a portion of the cost for the event.

In certain cases, the Agency might require a person with a disability to be accompanied by a support person for health or safety reasons. Before making a decision, the Agency will:

- Consult with the person with a disability to understand their needs;
- Consider health or safety reasons based on available evidence; and
- Determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

In such a situation, the Agency will waive the admission fee or fare for the support person, if one exists.

When discussing confidential information with a client accompanied by their support person, the client must sign a “Consent to Obtain/Release Information” form allowing the support person to be present during the discussion.

The following chart contains some examples of functions performed by support persons:

| <b>Client with a Disability</b>  | <b>Support Person’s Functions</b>  |
|--|--|
| Deaf or Blind  | To guide, to provide transportation and adaptive communication such as tactile or adaptive American Sign Language, large print notes, print on palm or two-handed manual signing |
| Deaf, Deafened, Oral Deaf  | To provide sign language or oral interpretation services – to translate conversation, not to participate in it   |
| Learning Disability  | To help with complex communication or note-taking  |
| Intellectual/Developmental Disability  | To help with travel, daily activities, prompting medication, complex tasks, or to keep them away from dangerous situations   |
| Mental Health Disability   | To help with communication tasks such as completing complex forms. To help in environment such as crowded, noisy settings or high-stress situations such as interviews.          |
| Physical Disability  | To provide services related to travelling, personal care such as toileting or eating, monitoring medical conditions  |
| Seizure Disorder   | To assist in the event of a seizure (e.g. To protect from falling)   |
| Speech impairment who uses an augmentative or alternative communication system (symbol board, electronic communication system) | To relay or interpret the person’s communications  |
| Vision Loss  | To read or to guide  |

## Appendix D

### **The Children's Aid Society of Stormont, Dundas & Glengarry**

#### **Accessible Customer Service Feedback Procedure**

#### **Addendum to 26.2 - Accessibility for Persons with Disabilities: Customer Service Standard Policy**

The Children's Aid Society of Stormont, Dundas & Glengarry recognizes the diverse needs of persons within the communities we serve and will respond by providing services and facilities that are accessible to everyone. The Society recognizes that every person has the right to make a complaint, offer a suggestion or compliment on the way we provide services to people with disabilities. Everyone is invited to provide their feedback. All feedback is tracked to ensure appropriate follow up and reporting and is kept in strict confidence.

Feedback may be provided in any of the following methods:

Feedback may be provided in any of the following methods:

- Telephone: (613) 933-2292 (Human Resources Benefit Specialist)
- Fax (613) 933-0726
- Email: [accessibility@cwcas.ca](mailto:accessibility@cwcas.ca)
- In Writing: Children's Aid Society of Stormont, Dundas & Glengarry

Attention: Human Resources Benefit Specialist

P.O. Box 983, 150 Boundary Rd.

Cornwall, ON K6H 5V1

- In person Ask for the Human Resources Benefit Specialist

This Feedback form can be made available in an accessible format, upon request.

**\*Note: A copy of the Accessible Customer Service Feedback Form is attached.**

All feedback is directed to the Human Resources Department. The Human Resources Department will provide a response no later than fourteen (14) business days of receipt of such feedback in a format that takes into account any disability and outlines actions deemed appropriate.

**Accessible Customer Service Feedback Form**

**Customer Contact Information:**

**Name:**

**Address:**

**City:**

**Province:**

**Postal Code:**

**Phone:**

**Email:**

**Date:**

**Please check appropriate boxes and fill out required sections:**

1. Is the feedback a Concern or a Compliment?      Concern            Compliment     

2. Is the feedback regarding our facility or a service?      Facility            Service     

3. What does the feedback pertain to?      Accessible        
Communication  
Assistive Devices        
Service Animals        
Service Disruption        
Support Persons        
Other (please specify in        
the additional comments  
section below)

4. What is the best way to contact you?      Email        
Phone        
  
Other (Please specify in        
the additional comments  
section below)

**Details of the Feedback:** (If required, please use additional pages)

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**Additional Comments:** (If required, please use additional pages)

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Feedback may be provided in any of the following methods:

| <b>RETURN COMPLETED FORM TO:</b> |   |
|----------------------------------|---|
| In Person:                       | To the reception counter at<br>150 Boundary Road, Cornwall, ON<br>Attention: Human Resources Benefit Specialist |
| By Mail:                         | PO Box 983, 150 Boundary Rd.<br>Cornwall, ON K6H 5V1<br>Attention: Human Resources Benefit Specialist           |



## **HRM 26.3      STANDARD FOR INFORMATION AND COMMUNICATIONS**

The Society is committed to excellence in serving all of our families and children, including people with disabilities. When providing information to, or communicating with, a person with a disability, we will provide the information and communication in a manner that takes into account the person's disability as provided in the customer service standard and under the Integrated Regulation.

The Society is committed to ongoing improvements to the accessibility of its information and communication systems offered to customers, employees, volunteers and members of the general public;

### **DEFINITIONS**

**“Accessible Information and Communications”** means considering accessibility and all ability levels when planning information and communications, and giving people adequate time to process and reply to information provided.

**“Emergency”** includes any unplanned event that can cause death or significant injuries to any person or animal. It can also shut down business, disrupt operations, cause physical or environmental damage or can threaten the organization's financial standing or public image.

**“Emergency Response Plan”** is a plan put into effect whenever a crisis, man-made or natural, disrupts operations, threatens life, creates major damage and occurs within the organization's premises, environments, operations and systems. While it is likely that outside assistance would be available in most large-scale crisis/emergency situations affecting the organization, an organization must be prepared to carry out crisis response and short-term recovery operations on an independent basis.

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

**“Internet Website”** means 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”** means 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.

**“New Internet Website”** means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

**“New Intranet Website”** means either an intranet website with a new domain name or an intranet website with an existing domain name undergoing a significant refresh.

**“Public Safety Information”** is information intended to prevent and protect the public from significant danger, injury/harm or damage as a result of events such as crimes or natural and man-made disasters.

**“WCAG Guidelines”** explain how to make web content more accessible to people with disabilities. Web content generally refers to the information on a web page or a web application, including, but not limited to text, images and forms.

**“Web Content Accessibility Guidelines”** means the World Wide Web Consortium recommendation, dated December 2008, entitled Web Content Accessibility Guidelines (WCAG) 2.0.

**“Web Page”** means a non-embedded resource obtained from a single URI using HTTP and any other resources that are used in the rendering or intended to be rendered together with it by a user agent.

## **HRM 26.3 (A) EMERGENCY RESPONSE PROCEDURES, PLANS AND PUBLIC SAFETY INFORMATION**

### **POLICY**

The Society is committed to:

- Creating, providing and receiving information and communications as well as emergency procedures, plans or public safety information in ways that are accessible for people with disabilities;
- Making accessible formats and communication supports for the emergency response plan and safety information available in a timely manner and at no additional cost;
- Notifying members of the public about the availability of the accessible emergency response plan and safety information using a variety of measures;
- Ensuring that all staff involved in assisting customers with disabilities during an emergency response do so in a safe manner. Staff must also ensure that the environment, equipment, information and communications, and tools used during the emergency response are safe, current and in good working condition.

### **SCOPE**

This policy applies to the Society’s employees, volunteers, customers and contractors and subcontractors engaged by the Society.

### **RESPONSIBILITY**

The Joint Health and Safety Committee is responsible for:

- Ensuring that policies/procedures incorporate general procedures and considerations for persons that require assistance to evacuate a hazardous environment or emergency situation in accordance with this policy;
- Including this procedure in the review of all general emergency response policies and safety information;
- Reviewing, updating and communicating the general emergency response plan to employees and all customers.

Management is responsible for:

- Ensuring that all employees follow the guidelines set out in this policy;
- Ensuring employees are trained and aware of the general emergency response plan for customers requiring assistance;
- Being aware of customers with permanent disabilities and/or those who require temporary assistance to evacuate in the event of an emergency;

- Discussing with the person who requires assistance to determine the level of assistance required to evacuate an area in the event of an emergency and determining the need to create individualized emergency response plans based on the procedure below to achieve the established emergency procedures for the building.

Employees are responsible for:

- Participating in training on the general emergency response plan for customers requiring assistance;
- Assisting those with special needs;
- Following established emergency procedures as required;
- Making sure customers are aware of the general emergency response plan or safety information.

Customers requiring assistance are responsible for:

- Informing staff that they require assistance in the event of an emergency situation;
- Requesting an individualized copy of the emergency response plan and/or safety information that will achieve the results intended by the unit and building's established emergency procedures;
- Maintaining communication with staff.

## **PROCEDURES**

The Society will ensure that its emergency response procedures, plans or public safety information is in place as required by law; and that these plans consider the needs of persons with disabilities and are available in an accessible format. The Society will, in cooperation with Building Management, prepare accessible emergency procedures and plans whenever it is made aware of any requirements in this regard.

The Society asks all individuals who may need assistance in an emergency to identify themselves to the staff. Once an individual has identified themselves, the staff will work with the individual to develop a personal emergency plan that includes specific evacuation procedures, sheltering procedures and means of communication in the event of an emergency in a format that meets the needs of that individual.

The Society is committed to training its employees to identify and assist persons who may need assistance in an emergency. If there is an immediate threat on the premises that requires evacuation, the staff will assist persons who require assistance as set out in the emergency response plan and/or safety information.

## **HRM 26.3 (B) ACCESSIBLE WEBSITES AND WEB CONTENT**

### **POLICY**

The Society is committed to conforming to the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG) 2.0 as outlined in the Information and Communications Standard for accessible websites and web content.

The Society is committed to the process of providing online information and communications and services that are accessible to all.

## **SCOPE**

This policy applies to the Society's employees and volunteers and all contractors and subcontractors engaged by the Society.

## **RESPONSIBILITY**

The Society will create a Web Accessibility Committee and this committee will:

- Plan how to achieve accessibility, including web developer training and assessing and testing the website for problems or hiring the appropriate consultant to do the assessment;
- Implement the appropriate solutions and guidelines to fix the problems or oversee the implementation of recommended solutions and guidelines;
- Create policies, practices and procedures for Web accessibility;
- Create documents informing website users on what was done to make the website accessible (and what could not be done) and how users can obtain these documents in an accessible format;
- Ensure appropriate employees are trained on the policies, practices and procedures for Web accessibility;
- Monitor and maintain accessible websites(s) and track new techniques for accessibility.

## **PROCEDURES**

The Society will ensure that it has an accessible website and web content in place, and that all new Internet and intranet websites and the web content on those sites will conform to Level A of Version 2 of the WCAG by January 1, 2014.

The Society will proactively assess its website and web content to identify, remove and prevent barriers to ensure online information and communications in the company are accessible for all customers.

## **HRM 26.3 (C) ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS**

### **POLICY**

The Society is committed to:

- Meeting alternative format requests in a timely fashion that responds appropriately to any situation and the urgency of the situation;
- Providing everyone with the same quality of information/communication and within a reasonable timeframe;
- Identifying, removing and preventing barriers to access of information and communications systems of the Society;
- Providing or making arrangements for accessible formats and information and communications supports when a person with a disability requests them;
- Making accessible formats and communication supports available in a timely manner and at no additional cost other than the regular price charged to everyone for the same information;
- Notifying members of the public about the availability of accessible information and communications.

## **SCOPE**

This policy applies to the Society's employees and volunteers and all contractors and subcontractors engaged by the Society.

## **RESPONSIBILITY**

The Accessibility Advisory Committee is responsible for the administration of this policy.

Management is responsible for ensuring that all employees follow the guidelines set out in this policy.

All employees, volunteer, contractors and subcontractors, and any other person acting on behalf of the Society and persons involved in the creation of policies are responsible for adhering to and following the commitments set out in this policy.

## **PROCEDURES**

The Society will create accessible communication standards that ensure the following:

- Upon request, the Society provides or arranges for the provision of accessible formats and communication supports for persons with disabilities;
- The Society does so in a timely manner that takes into account the person's accessibility needs;
- If there is a cost, the Society does not charge more for such formats and supports than it charges other persons;
- The Society consults persons with a disability as to what would be a suitable alternative format or communication support for them;
- If the information or communications are unconvertible, upon request, the Society will provide an explanation of why it is unconvertible and provide a summary of the unconvertible information or communications;
- The Society will create this requirement by January 1, 2016, as required by the Integrated Regulation.

The process to request accessible information and communications is as follows:

- An alternative format can be requested by completing an alternative format or communication support request form;
- This form will be available on the organization's corporate website and at the reception area;
- This form can be emailed, faxed, mailed and submitted online or in person;
- Employees must ensure these requests are dealt with in a timely manner and that the response fits the need of the person making the request. The request must be dealt with within 48 hours;
- Employees must record and retain all requests received and note when they were made, how they were made, who received the request, what was requested, when and how it was dealt with, by whom and when, and if the request was dealt with to the satisfaction of the customer.

## **HRM 26.3 (D) ACCESSIBLE FEEDBACK PROCESS**

### **POLICY**

The Society is committed to ensuring that it has processes for receiving and responding to feedback that are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.

The Society will notify the public about the availability of this feedback process in accessible formats and with communication supports. The Society encourages and appreciates feedback and comments on the manner in which it provides its information and communications to people with disabilities.

### **SCOPE**

This policy applies to the Society's employees and volunteers and all contractors and subcontractors engaged by the Society.

### **RESPONSIBILITY**

The Accessibility Advisory Committee is responsible for the administration of this policy.

Management is responsible for ensuring that all employees follow the guidelines set out in this policy.

All employees, volunteer, contractors and subcontractors, and any other person acting on behalf of the Society and persons involved in the creation of policies are responsible for adhering to and following the commitments set out in this policy.

### **PROCEDURES**

The Society will ensure that it has processes for receiving and responding to feedback that are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.

The process will consist of the following:

- An accessible information and communications feedback form will be available at our office and placed on our website inviting users of its service or the public to provide feedback on their experience with or concerns about the information and communications system/platform including all type of company documentations received or used.
- Details on how to submit the feedback form are included on the form itself.
- The Society will respond to feedback using the same format in which it was received.

## **HRM 26.4 EMPLOYMENT STANDARD**

The Society is committed to:

- Ensuring that people with disabilities have the same opportunity of access to employment opportunities and related services as do all prospective employees and current employees;
- Meeting the accessibility needs of people with disabilities in a timely manner, in its human resources practices, processes, policies and procedures and employment related services

### **DEFINITIONS**

**“Career Development and Advancement”** includes providing additional responsibilities within an employee’s current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority or a combination of both.

**“Communication Supports”** may include, but are not limited to, captioning, alternative and augmentative communication, plain language, sign language, and other supports that facilitate effective communications.

**“Communications”** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

**“Conflict of Interest”** means a situation in which a member of the selection committee has a conflict of interest in participating in the hiring decision.

**“Employee”** means every person who provides services to the Society in return for wages.

**“External Candidates”** are applicants who are not current employees of the Society.

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

**“Internal Candidates”** are applicants who are current employees of the Society.

**“Performance Management”** means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

**“Persons with Disabilities”** are individuals who have a disability as defined under the Ontario **Human Rights Code**.

## **HRM 26.4 (A) RECRUITMENT, ASSESSMENT AND SELECTION**

### **POLICY**

The Society is committed to transparent and merit based selection in all of its recruiting and hiring decisions. All applicants are given an equal opportunity for employment in compliance with the provisions of the Ontario *Human Rights Code*, the **AODA**, the Standard for Employment under the IASR, and any other applicable legislation and/or regulations.

No job applicant or employee will receive less favourable treatment because of their race, colour, ancestry, creed (religion), place of origin, ethnic origin, citizenship, sex (including pregnancy), sexual orientation, age, marital status, family status, disability, record of offences, gender identity and expression, or will be disadvantaged by conditions or requirements which cannot be justified.

The process of recruitment and selection must be fair, systematic, efficient and effective, ensuring equality of opportunity. The criteria for selection should be based on relevant knowledge, skills, attitudes and physical ability to do the job as described in an up-to-date job description.

## **SCOPE**

This policy applies to all applicants, prospective employees and employees, and all facilities of the Society in Ontario. However, it does not apply to volunteers and other non-paid employees.

## **RESPONSIBILITY**

Management and the Human Resources Department will

- Identify and remove any employment practices or selection criteria that may result in employment barriers for any individual or groups. Such barriers would include any requirement that is not a bona fide occupational requirement, a necessary requirement under the collective agreement or statutory requirement, or a necessary requirement for the effective operation of the company;
- Ensure accessibility and accommodation is provided (as needed) for candidates.

Applicants will:

- Consult with Human Resources to disclose and request accommodation, as required, if they have a disability.

## **PROCEDURE**

The Society will ensure that in its recruitment, job selection and job offer practices the public and employees are made aware that it will provide accommodation for applicants with disabilities, upon request, in its recruitment, assessment and selection process.

The Society will notify its current employees and the general public about the availability of accommodation for applicants with disabilities in the recruitment process. This will be done by including a statement on the job postings as well as in an automated response to emails received from job applicants.

Applicants are encouraged to ask for accommodation for any disabilities as defined under the AODA and whether there are any reasonable adjustments needed for them to attend an interview. All applicants with a disability who meet the essential criteria for a job will be considered on their merits.

Applicants who are chosen to participate in the selection process will be notified that accommodations are available upon request in relation to the materials and/or processes to be used.

Once an accommodation has been requested and analyzed, an individual accommodation plan will be drafted and all assessments used must respect and take into consideration the candidates' individual plan.



When making and processing the final selection decision, all appointments will be made strictly on merit and be related to the requirements of the job and considering the individual accommodation plan, if applicable.

When the Society makes an offer of employment, it will notify the successful applicant of its policies for accommodating employees with disabilities.

As soon as practicable after they begin employment, new employees will be informed of the company's policies to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

## **HRM 26.4 (B) PERFORMANCE MANAGEMENT**

### **POLICY**

The Society is committed to removing barriers for employees with disabilities and takes into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.

### **SCOPE**

This policy and the procedures outlined herein apply to all positions at the Society.

### **PROCEDURE**

In administering performance management processes in respect of employees with disabilities, the Society will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans.

An up-to-date individualized accommodation plan shall be consulted (if applicable) to ensure that when assessing the employees' performance at work, the accessibility needs of employees with disabilities as well as individual accommodations are taken into account.

If an employee in an accommodated position does not reach and maintain the required standards for his or her position after three review periods (each set one month apart), the employee's individualized accommodation plan will be reviewed and other possible accommodations will be explored.

## **HRM 26.4 (C) CAREER DEVELOPMENT AND ADVANCEMENT**

### **POLICY**

Career development and advancement applies to all employees and imposes obligations on individuals to develop and on the Society to support that development in ways that are consistent with the needs of individual employees as well as the organization's needs and objectives.

The principles of equal opportunity and reasonable accommodation are essential characteristics of career development and advancement in the Society.

Career development and advancement needs related to an individual's ability to advance within or between jobs and includes activities such as learning additional duties, pursuing opportunities for

promotion, exploring other job opportunities, using transferable skills and experience, and job skills upgrading.

### **SCOPE**

This policy and the procedures outlined herein apply to all positions at the Society.

### **PROCEDURE**

Where the Society provides career development and advancement to its employees, the Society will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans.

## **HRM 26.4 (D) ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS**

### **POLICY**

Where an employee of the Society requests it, the organization will consult with the employee to arrange for the provision of accessible information and communication supports for information that is needed to perform the employee's job, and information that is generally available to employees in the workplace.

### **SCOPE**

This policy and the procedures outlined herein can apply to all employees of the Society.

The procedures apply to all materials and communications produced by the Society for release to employees whether produced in house or on behalf of the organization. It does not apply to unconvertible information and information that the organization does not control directly or indirectly through a contractual relationship.

### **RESPONSIBILITY**

The Society will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

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

Management will consult with their employees who have disabilities in order to provide them with the accessible formats and communications supports they require to do their jobs effectively and to be informed of information that is generally available to all employees in the workplace.

### **PROCEDURE**

Where an employee with a disability so requests, the Society will consult with the employee to provide or arrange for accessible formats and communication supports in relation to information that is generally available to employees in the workplace and that the employee needs to perform his or her job.

The Society will advise employees of the availability of accessible formats and communications supports. The Accessible Formats and Communication Supports request form can be obtained from Human Resources or management.

The Society will include:

- A link on the intranet to the Accessible Formats and Communication Supports request form
- A notice that accessible formats and communication supports are available upon request prominently displayed in all employee handbooks, policy manuals, instructions, standards, and internal corporate communications.

Requests for an accessible format or communication support can be received in person, by phone/TTY, or through email.

Accessible formats and communication supports shall be provided in a timely manner, taking into account the employee's accessibility needs.

If it is determined that the information is unconvertible, the employee requesting the information or communication support shall receive:

- A written explanation as to why the information or communications are unconvertible; and
- A summary of the unconvertible information or communication.

## **HRM 26.4 (E) DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS**

### **POLICY**

The Society is committed to meeting its obligations under both the *Ontario Human Rights Act* and the *Accessibility for Ontarians with Disabilities Act*.

Provided a person who falls under one of the protected grounds as described in the *Ontario Human Rights Act* is able to perform the essential duties of their own job or other alternate work and requests accommodation in order to do so, the Society will attempt to accommodate that person in accordance with this Policy and the Society's Accommodation Guide.

As soon as practicable after employees have been hired, the Society will inform them of its policies used to support its employees seeking accommodations based on a ground under the *Ontario Human Rights Code* including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs.

The Society will provide updated information to its employees whenever there is a change to existing policies that take into account an employee's accessibility needs.

The goals of this Policy are:

- To provide a fair and consistent approach to the management of employees who are seeking an accommodation of a disability and/or returning to work following an illness or injury;
- To facilitate the reintegration of the employee in the workplace in a progressive, safe and timely manner with the goal of preventing reoccurrence and in the hopes that the employee will return to regular duties and hours of work in the Employee's pre-disability job.

## **RESPONSIBILITY**

Management is responsible for:

- Ensuring the principles outlined in this policy are adhered to;
- Actively and collaboratively participating in the development and implementation of an employee's individual accommodation plan;
- Ensuring that the employee's personal medical information is kept confidential and only disclosed to those necessary in the assessment and development of the accommodation.

Employees are responsible for:

- Completing the Accommodation Request Form and submitting this to Human Resources as soon as possible, as well as any applicable supporting documentation;
- Actively and collaboratively participating in the development and implementation of their individual accommodation plan.

Human Resources is responsible for:

- Reviewing an employee's accommodation request in a timely manner;
- Scheduling meetings with all concerned parties in order to develop an employee's individual accommodation plan;
- Determining appropriate timelines for the review of an employee's individual accommodation plan;
- Ensuring that the employee's personal medical information is kept confidential and only disclosed to those necessary in the assessment and development of the accommodation;
- Finalizing an employee's individual accommodation plan that:
  - o Is provided in a format that takes into account the employee's accessibility needs, if requested;
  - o Includes, if requested, any information regarding accessible formats and accommodation supports provided;
  - o Includes, if required, individualized emergency response information;
  - o If denied, includes reasons for doing so;
- Providing a copy of the individual accommodation plan to those involved in the development or use of the accommodation plan.

## **PROCEDURES**

Employees who are requesting accommodation due to a disability, or who have been absent from work due to disability, illness or injury for more than three (3), but less than eight (8) consecutive days (or earlier if required by the Society) must provide Human Resources with the "Society Medical Questionnaire". This certificate should indicate one of the following:

- That the Employee is fit to return to the regular duties and hours of their pre-disability position;  
or
- The Employee's limitations and restrictions upon their return and a prognosis for their return to regular duties and hours.

If an Employee is returning with restrictions and limitations, they are also required to complete an "Accommodation Request Form" and submit it to Human Resources.

This Policy should be read in conjunction with the Accommodation Guide which has been developed in order to assist in the Society's Accommodation process. This Guide is available from Human Resources.

## **HRM 26.4 (F) WORKPLACE EMERGENCY RESPONSE INFORMATION**

### **POLICY**

In any emergency or business interruption, the Society has a responsibility to ensure the safety of its employees and to manage emergencies and business interruptions to minimize loss and inconvenience to all concerned.

### **PROCEDURE**

The Society will ensure that individualized workplace emergency response information is provided to employees who have a disability provided the disability is such that individualized information is necessary and the organization has been made aware of the need for accommodation due to the disability. The Society will provide the necessary information as soon as practicable after becoming aware of the need for accommodation.

If an employee who receives individualized workplace emergency response information requires assistance, the Society will, with the consent of the employee, provide such information to the person designated to provide assistance to the employee.

The Society will review individualized workplace emergency response information:

- When the employee moves to a different location in the company;
- When the employee's overall accommodations needs or plans are reviewed;
- When the Society reviews its general emergency response procedures.

The Society will ensure that the workplace emergency response information requirements are in place as of January 1, 2012.

## **HRM 26.4 (G) RETURN-TO-WORK**

It is the policy of the Society to offer a return-to-work program to all employees following an injury or an illness.

The purpose of the program is to:

- Provide an early and safe transition from convalescence to productive employment;
- Where necessary and appropriate, assist an employee in providing an opportunity to gradually build his/her physical and mental conditioning prior to engaging in regular full-time or part-time work;
- Mitigate the employee's loss of earnings;
- Expedite the rehabilitation process.

Modified work and/or work hardening may include the following time-defined accommodations:

- Fewer working hours;

- More rest breaks;
- Assistance from co-workers;
- Alternative jobs;
- Assistive devices;
- Special projects.

To qualify for modified work or work hardening, the employee is required to submit medical documentation regarding his/her functional abilities.

Upon proper notification from the employee that he/she is not totally disabled and is capable of performing modified work, the HR Department, the Supervisor, the employee and if required, representative(s) from OPSEU, will meet to discuss the viability of modified work or work hardening and co-ordinate a return-to-work plan based on the employee's medical restrictions and the organization's ability to accommodate those restrictions.

The return-to-work plan shall include:

- A brief description of the job duties the employee will perform;
- Department, date, and schedule the employee is to commence modified work or work hardening;
- In the case of work hardening, specific dates on which work time and/or workload increases;
- The date the employee can return to regular full-time or part-time work;
- Signature of approval of the plan from the employee and if required, the representative(s) of OPSEU if unionized.

If the return-to-work plan is to be carried out in a department other than the employee's own, that department Supervisor shall form part of the return-to-work review.

For the duration of the return-to-work plan, the Supervisor will monitor the employee's progress and maintain contact with the Human Resources Department.

When the return-to-work program is nearing the end of its term, the Human Resources Department and the Supervisor will meet with the employee and union representative, if required, to perform a final assessment of the employee's progress. If the employee requires a medical assessment, it will be arranged by the employee. The employee must obtain appropriate medical clearance before commencing regular work.

The employer and employee will consult with each other should there be a question of residual effect of the illness.