

<b>STATEMENT of POLICY and PROCEDURE</b>			
Section:	CORPORATE	No.	B-12
Subject:	<b>ACCESSIBILITY</b>	Issued:	November 2011
Issue to:	ALL STAFF ALL MANUAL HOLDERS	Total # of Pages:	8
Issued by:	BOARD OF DIRECTORS	Reviewed <b>Revised:</b>	February 2017

## **1 POLICY**

1.01 Ottawa-Carleton Lifeskills Inc. (OCL) is committed to providing high-quality services that respect the dignity, independence, integration and equality for all persons and, to ensuring that they receive accessible goods and services of the same quality and in a timely manner as others.

Note: In addition to this policy, the individuals supported by OCL are also covered by other OCL individual-specific policies and procedures.

1.02 OCL will endeavour to eliminate and prevent barriers to accessibility and will provide accessible entrances and paths of travel to its physical premises (ie: ramps, door handles/openers, sidewalks, stairs, curbs, railings, etc.).

1.03 OCL is committed to communicating in ways that accommodate accessibility needs and upon request will provide accessible formats and communication supports to persons with disabilities in a timely manner that take into account their needs and at a cost that is no more than the regular costs charged to other persons (if applicable).

1.04 OCL recognizes that service animals and/or support persons are an essential part of supporting persons with disabilities as well as any assistive devices they may require.

1.05 OCL will provide training on accessibility standards and requirements to all employees, students, volunteers and others as applicable.

1.06 OCL will review and update this policy, the Accessibility Plan and all related policies and procedures every 5 years or earlier as required. OCL is committed to achieving full accessibility by 2025.

1.07 OCL reserves the right to ask for verification that a person has accessibility requirements and needs accommodation due to a disability.

1.08 OCL's Early and Safe Return to Work (ESRTW) policy and procedures will include measures that accommodate disability-related requirements.

1.09 This policy is available in accessible formats and communication supports upon request.

## **2 PURPOSE**

- 2.01 This policy endeavours to ensure that all persons are treated with courtesy and respect, made to feel welcome and have their need for accommodation respected whether a disability is apparent or not.

## **3 SCOPE**

- 3.01 Applies to all employees, students, volunteers (including the Board of Directors), and any other third party as applicable (ie: contractor, etc.) who may conduct business with OCL.

## **4 RESPONSIBILITY**

- 4.01 EMPLOYEES are responsible for:

- a) Reading, signing off on, and complying with this policy.
- b) Consulting with a person about the type of support they need within a timely manner and bringing forward the request to their Supervisor if necessary. Provide the required support at the same cost (if any) as for others.
- c) Knowing how to use assistive devices that may be available within the various locations and for ensuring that all devices are in good working order at all times.
- d) Informing anyone needing accommodation of the assistive devices that are available and for assisting them in their use as applicable.
- e) Communicating with anyone needing accommodation over the telephone in plain language and for speaking clearly and slowly in a regular tone of voice.
- f) For speaking directly to the person and not to the companion if someone needing accommodation has a companion with him/her to provide support.
- g) Offering to communicate by other means of communication support (ie: letter, email, TTY, text and voice telephones, relay services, etc.)
- h) Not touching or moving any assistive device or service animal a person brings with him/her without permission.
- i) Attending all training sessions as required.
- j) Providing support to any employee who has an established accommodation plan based on their accessibility needs. Supporting and participating in any worker's Early and safe Return to Work (ESRTW) plan as applicable.
- k) Asking any Accessibility for Ontarians with Disabilities Act (AODA) Inspectors for identification before entering the premises and for recording what identification was presented and then for immediately informing their Supervisor or other management.

Note: AODA inspections can occur anytime during regular business or daylight hours and AODA Inspectors do not need a warrant. However, they must provide identification prior to entering the premises.

4.02 STUDENTS and VOLUNTEERS are responsible for:

- a) Understanding and complying with this policy as applicable.
- b) Knowing how to use assistive devices that may be available under the direction of OCL staff.
- c) If someone needing accommodation has a companion with him/her to provide support, for speaking directly to the person and not to the companion.
- d) Not touching or moving any assistive device or service animal a person brings with him/her without permission.

4.03 SUPERVISORS are responsible for:

- a) Ensuring that all employees read and sign off on this policy. Ensuring that all students and volunteers read and understand this policy as it applies to them. Ensuring that any third party (ie: contractor, etc.) who may be on the premises is aware of and complies with this policy as applicable.
- b) Providing training to all employees, students and volunteers on how to interact and communicate with those who have accessibility needs. Attending all training sessions as required.
- c) Ensuring that their employees, students and volunteers know how to use all assistive devices that are available within OCL as applicable.
- d) Responding to any request for accommodation brought forward to them by their staff.
- e) Providing notice in the event of a planned or unexpected disruption in services.
- f) On rare occasions, when a Supervisor determines that a support person or a service animal cannot enter an area of the premises because of other laws and/or regulations (ie: hospitals, kitchens, etc.), the Supervisor will suggest appropriate alternatives and will provide assistance as necessary.
- g) Responding to any complaints and informing their Program Director of any issues and the follow-up actions taken.
- h) Immediately advising a Program Director of any AODA inspections.
- i) Actively participating in the assessment of job duties and in establishing an accommodation plan for an employee/student/volunteer whom may have accessibility needs.
- j) As per Section 7.18 – 7.22 below.

4.04 PROGRAM DIRECTORS are responsible for:

- a) Ensuring that all Supervisors are trained on how to interact and communicate with anyone who requires accommodation and how to respond to any complaints. Attending all training sessions as required.
- b) Providing the support or tools the Supervisors need in order to carry out their duties above (subject to the usual approval process).
- c) Responding to any complaints received.
- d) After consultation with the Supervisor, for providing documents, records and information to an AODA Inspector as required.
- e) Keeping the Executive Director informed of any complaints and/or inspections.

4.05 The EXECUTIVE DIRECTOR is responsible for:

- a) Ensuring that the Executive Assistant is trained on how to interact and communicate with visitors who may have accessibility needs.
- b) Ensuring OCL's website and/or other electronic communication system complies with this policy and AODA requirements.
- c) Providing or arranging for training on accessibility standards for the Board of Directors as required.
- d) Responding to any complaints brought forward at the Executive Director level and for keeping the Board of Directors apprised as necessary.

4.06 HUMAN RESOURCES is responsible for:

- a) Ensuring Human Resources employees are trained on how to interact and communicate with anyone, including job applicants, who may have accessibility needs.
- b) Notifying job applicants who are being interviewed about the availability of accessible formats and communication supports and for arranging when requested.
- c) Preparing accommodation plans for individual employees requiring accessible formats and communication supports in conjunction with the appropriate parties (ie: the employee, supervisor, union representative, doctor, WSIB, etc.).
- d) As per Section 7.22 – 7.27 below.

4.07 The FINANCE Director is responsible for:

- a) Ensuring that all Finance employees are trained on how to interact and communicate with anyone who has accessibility needs.

- b) Ensuring that all invoices and/or other finance documents are made available in accessible formats and communication supports upon request.
- c) Ensuring that any contractor or provider of services is aware of, and understands their requirement to comply with the AODA.

## **5 DEFINITIONS**

- 5.01 Person(s): Anyone coming onto OCL premises who requires accommodation due to a disability.
- 5.02 Accessibility: Removing barriers that keep persons with disabilities from participating in all aspects of life including physical accommodations (ie: installing wheelchair ramps, door handles, etc.), and administrative measures such as providing documents in accessible formats, etc.
- 5.03 Accommodation: Special arrangements made or assistance provided so that persons with disabilities can participate in experiences available to persons without disabilities. Accommodation varies according to the specific needs of each individual.
- 5.04 Disability: Any degree of verified physical disability, condition of mental impairment or a developmental disability, learning disability or mental disorder.
- 5.05 Dignity and Respect: Service is provided in such a way that allows an individual with a disability to maintain self-respect and be respected by others.
- 5.06 Equal Opportunity: Opportunity to access goods and services by people with disabilities that is as effective as that provided to persons without disabilities. To be equally effective, an aid, benefit or service need not produce the identical result or level of achievement for disabled and non-disabled persons. But, it must afford the person to whom it is provided equal opportunity to achieve equal results, gain equal benefit and reach the same level of achievement.
- 5.07 Independence: A person is able to do things on their own without unnecessary help or interference from others.
- 5.08 Customer Service Standards: Encompass the four principles of independence, dignity, integration and equality of opportunity to ensure that customers with disabilities can obtain, use, benefit from the services, and enjoy that benefit seamlessly.
- 5.09 Service Animal: Animals that are individually trained to perform tasks for people with disabilities such as guiding people who are blind, alerting people who are deaf, pulling wheelchairs, assistance dogs for people with mobility impairments, special skills dogs that detect oncoming seizures, or animals trained to offer specific emotional support to those with diagnoses that benefit from having a service or therapy animal assist them.

- 5.10 World Wide Web Consortium Web Content Accessibility Guidelines 2.0: Ensures that the technology used works with assistive technologies and the accessibility features of operating systems, browsers, and other user agents.
- 5.11 Performance Management: Activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- 5.12 Career development and advancement: Includes providing additional responsibilities within an employee's current position and/or the movement of an employee from one job to another that may provide greater responsibility or be at a higher level, or any combination thereof.
- 5.13 Redeployment: The reassignment of employees to other department or jobs within the organization as an alternate to lay off, when a particular job or department has been eliminated by an organization.
- 5.14 Early and safe Return to Work (ESRTW) program. A rehabilitative work program in which job duties are altered and/or substituted based on the employee's functional capabilities and limitations as outlined on a Functional Abilities Form.
- 5.15 Accessible Formats and Communication Supports

Alternatives to standard print are often referred to as accessible formats, and ways to help communication between people are referred to as communication supports. When a request is received, consultation with the person will determine the most appropriate accessible format or communication support depending on the accessibility needs of the person and the ability of OCL to deliver.

Examples of alternate formats and communication supports are:

- Verbally reading written information directly to a person
- Large print
- Text transcripts of audio or visual information
- Subtitles
- Handwritten notes instead of spoken word
- Information written in plain language
- An electronic document formatted to be accessible for use with a screen reader
- Braille
- TTY telephone capabilities
- Telephone amplifiers

- 5:16 Where practicable or when possible:

Capable of being done or put into practice with available means. Includes consideration of the availability of resources, time restraints, budget, feasibility of application, etc.

## **6 REFERENCE and RELATED STATEMENTS of POLICY and PROCEDURE**

Canadian Charter of Rights and Freedoms  
 Ontario Human Rights Act  
 Ontarians with Disabilities Act, 2001

Accessibility for Ontarians with Disabilities Act (AODA), 2005:  
Ontario Regulation 429/07: Accessibility Standards for Customer Service  
Ontario Regulation 191/11: Integrated Accessibility Standards  
Blind Person's Rights Act, 1990  
Dog Owners' Liability Act, Ontario  
Food Safety and Quality Act 2001, Ontario Regulation 31/05  
Early and Safe Return to Work policy E-4  
Pets and Service/Therapy Animals Policy D-17  
World Wide Web Consortium Web Content Accessibility Guidelines 2.0  
Supporting Policy Statements and Procedures

## **7 PROCEDURE**

### **7.01 THE PROVISION OF GOODS AND SERVICES TO PERSONS WITH DISABILITIES**

- a) OCL will make every effort to ensure that all OCL policies, procedures and practices are consistent with the principles of dignity, independence, integration and respect that persons with disabilities have equal access to all OCL services and supports.
- b) When a request for an accessible format or communication support has been received, OCL will consult with the person making the request to determine what is required and suitable. OCL will provide the accessible format or communication support where practicable and possible.
- c) OCL will ensure that accessible formats and communication supports are provided in a timely manner ie: at the same time, within 24 hours or a reasonable time frame depending on format/support needed.
- d) If information or communications cannot be converted, upon request, OCL will provide an explanation as to why it cannot be converted and provide a summary of the unconvertible information or communications.
- e) No changes shall be made to this policy before considering their impact. Any policy that does not respect and promote the dignity and independence of those with accessibility needs will be modified.

### **7:02 SUPPORTING POLICY STATEMENTS AND PROCEDURES**

Additional information and procedures are described in the following documents which are available in alternative formats upon request.

#### Supporting Policy Statements and Procedures:

- # 1: Statement of Commitment
- # 2: Accessibility Policy B-12 and Accessibility Plan
- # 3: Assistive Devices
- # 4: Service Animals and Support Persons
- # 5: Feedback
- # 6: Notice of Disruption of Services and Emergencies
- # 7: Information, Communication and Publications
- # 8: Purchasing or Acquiring Goods, Services or Facilities

- # 9: Self Service Kiosks
- # 10: Documents and Annual Reporting
- # 11: Training
- # 12: Employment

### 7.03 **REPORTING**

- a) An annual Accessibility Standard Report shall be filed with the government as per the time table below or at such other time as required.

December 31, 2014  
December 31, 2017  
December 31, 2020  
December 31, 2023

- c) Reports will include:
  - a) General policies regarding the provision of goods and services to the public.
  - b) Policies on the use of assistive devices including what devices are available.
  - c) Policies on permitting services animals and support persons.
  - d) Steps to provide notice of temporary disruption.
  - e) Summary of the training program and when it was provided.
- d) The report shall be made available to the public on the OCL website and in accessible formats upon request.

### **8 ATTACHMENTS**

Supporting Policy Statements and Procedures as listed above.