

<b>POLICY:</b>	AODA and Accessibility		
<b>APPROVED BY:</b>	Senior Leadership	<b>APPROVED:</b>	
<b>LAST REVIEW:</b>		<b>REVISED ON:</b>	June 2024

## COMMITMENT TO INCLUSIVITY

Niagara Support Services and Niagara Training & Employment Agency (together the “Employer”) is dedicated to promoting an equitable environment for people supported, employees and members of the community. As a champion of diversity and accessibility, the Employer recognizes that our efforts in promoting and ensuring accessible goods, services and facilities are a key driver to creating and sustaining an inclusive organization.

The Employer recognizes that our dedication to diversity and inclusion is intrinsically linked to fostering a rich learning and working environment. We not only recognize our obligations under the Ontario Human Rights Code, but we strive to maintain an equitable environment and continuously demonstrate leadership in creating an inclusive organization.

## PURPOSE

### Accessibility for Ontarians with Disabilities Act (AODA) and the Agency

The *Accessibility for Ontarians with Disabilities Act, 2005* fundamentally changed the approach to accessibility for people with disabilities by establishing accessibility standards that all organizations and businesses that operate in Ontario must adhere to. In this regard, organizations and businesses that provide goods and services in Ontario would be obligated to continually identify, remove and prevent barriers so that people with disabilities have more opportunities to participate in everyday life.

In 2008, the *Accessibility Standards for Customer Service (CSS)* became law. In 2011, the *Integrated Accessibility Standards Regulation (IASR)* harmonized the *Information and Communications, Employment and Transportation* standards. The IASR requirements are to be phased in from 2011 to 2021, with specific compliance deadlines for various sections of the regulation.

In accordance with the *Integrated Accessibility Standards Regulation (IASR)*, the Employer posts a Multi-Year Accessibility Plan, which outlines the Employer’s strategy to remove and prevent barriers under this regulation. The Employer uses the accessibility policy, to demonstrate our commitment to the obligations under all of the AODA Accessibility Standards. Our Multi- Year Accessibility Plan provides the strategy designed to meet all obligations under the AODA Accessibility Standards.

## SCOPE

### Accessibility Policies

In accordance with the *AODA, IASR, s.3*, the Employer will implement and maintain policies governing how the Employer will achieve accessibility through meeting its requirements in the *AODA Integrated Accessibility Standards Regulation*. The Employer will continue to adhere to the Accessibility Standards for Customer Service Policy, which is posted on the website in an accessible digital format. These policies apply to all employees, board members, volunteers and others who provide goods, services or facilities on behalf of the organization and serve the community.

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## DEFINITIONS

### Disability [as defined under the *Ontario Human Rights Code 10(1)*]

- 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, including diabetes mellitus, epilepsy, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or on a wheelchair or other remedial appliance or device,
- A condition of mental retardation or impairment,
- Learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
- A mental disorder, or
- An injury or disability for which benefits were claimed or received under the *Workplace Safety and Insurance Act 1997.3*.

### 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 communications.

### Communications

- Means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

### Conversion ready

- Means an electronic or digital format that facilitates conversion into an accessible format.

### Information

- Includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that conveys meaning.

## KEY PRINCIPLES

The Employer is committed to ensuring that all policies, practices and procedures established under the AODA accessibility standards, adhere to the following key principles.

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<b>LAST REVIEW:</b>		<b>REVISED ON:</b>	June 2024

**Dignity** - services provided respect the dignity of persons with disabilities.

**Independence** - freedom from control or influence of others; in other words, the freedom to make one's own choices.

**Integration** - persons with disabilities may benefit from the same services, in the same place, and in the same or similar way as other customers.

**Equal Opportunity** - persons with disabilities have the same access as others to obtain, use and benefit from goods or services.

## **POLICY**

In addition to our continued obligation under the *CSS*, the Employer is required to meet accessibility obligations under the *AODA and IASR* according to the timetable specific for large non-profit sector organizations.

The purpose of this policy is to outline the Employer's commitment to help identify and remove barriers that impede a person's ability to access our goods, services and facilities.

## **PROCEDURE**

**1.0** The Employer will apply the principles and regulations of the AODA accessibility standards to ensure that all of our goods, services and facilities are inclusive of every person with or without a disability.

### **2.0 Accessibility Standards for Customer Service - Ontario Regulation 429/07**

We are committed to ensuring that all persons may receive accessible goods and services in an equitable, timely manner. Our Accessible Customer Service policy outlines the various commitments and steps the Employer will take to ensure that employees, volunteers and community members receive equitable and effective customer experience.

### **3.0 Integrated Accessibility Standards - Ontario Regulation 191/11**

In accordance with the *Integrated Accessibility Standards Regulation*, the Employer has made the following accessibility commitments.

#### **3.1 General Accessibility**

**3.1.1** The Employer has developed a Multi-Year Accessibility Plan, which outlines the Employer's strategy to prevent and remove barriers and meet its requirements under this Regulation. The plan is available in a digitally accessible format on the Employer website and is available in an alternate format upon request. The Employer will review and update the multi-year plan in consultation with others at least once every 5 years.

<b>POLICY:</b>	AODA and Accessibility		
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<b>LAST REVIEW:</b>		<b>REVISED ON:</b>	June 2024

**3.1.2** An accessible annual status report will be prepared and posted on the Employer website reflecting the initiatives and progress in removing and preventing barriers.

**3.1.3** The Employer will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not feasible to do so. In the event that it is not feasible to do so, and upon request, the Employer will provide a written explanation detailing why accessibility criteria could not be incorporated in the procurement or acquisition of goods, services and/or facilities.

**3.1.4** The Employer ensures that all employee groups, volunteers, persons who participate in the development of policies, and all other persons who provide goods, services or facilities on behalf of the Employer receive training on the requirements of the accessibility standards and on the *Ontario Human Rights Code*, as it pertains to persons with disabilities.

The training that is provided shall be appropriate to the duties of the employees, volunteers and other persons. The Employer has taken the necessary steps to ensure all new employees receive training as soon as practicable.

The Employer ensures that all employees, volunteers and other persons receive training as soon as possible regarding any changes made to this policy.

#### **4.0 Information and Communication**

**4.1** The Employer will meet the communication needs of persons with disabilities and will provide information and communication materials in accessible formats, or with communication supports upon request.

If the Employer determines that the information or communication is unconvertible, the Employer shall provide to the person requesting the information or communication with an explanation as to why it is unconvertible, a summary of the unconvertible information or communication.

For the purposes of this commitment and in accordance with this legislation, information and communications are unconvertible if:

- it is not technically feasible to convert the information or communications; or
- the technology to convert the information or communications is not readily available.

**4.2** The Employer will ensure that the processes for receiving and responding to feedback are accessible and will provide accessible formats and communication supports upon request. The Employer has an accessible feedback process established in accordance with the Accessibility Standards for Customer Service (O. Reg. 497/07), which is available on the Employer website.

**4.3** The Employer will provide or arrange for the provision of accessible formats and communication supports upon request 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 charged to other persons.

<b>POLICY:</b>	AODA and Accessibility		
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<b>LAST REVIEW:</b>		<b>REVISED ON:</b>	June 2024

The Employer consults with the person making the request in determining the suitability of an accessible format or communication support.

The Employer notifies the public about its commitment to the availability of accessible formats and communication supports through the Employer’s website.

**4.4** The Employer has an Emergency Pandemic Plan document that outlines the emergency procedures to ensure the safety of the Employer’s community. This information is made available on the Employer’s website and is available in an alternative format, or with communication supports upon request.

**4.5** The Employer will ensure that their website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A and increasing to Level AA, in accordance with the schedule set out in this section of the regulation. This includes all web-based applications and web content that are controlled directly or through a contractual relationship.

**4.6** The Employer will provide education or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person upon request.

The Employer meets this obligation through the procurement process or through obtaining by other means an accessible or conversion-ready electronic format of the educational or training resources or materials where available. In the case that the materials cannot be procured or obtained by other means or converted into an accessible format, the Employer is committed to ensuring that it makes the necessary arrangements for the provision of a comparable resource.

This obligation includes educational or training resources or materials produced by the Employer in an accessible format to persons with disabilities upon request.

## **5.0 Employment**

The Employer is committed to ensuring that all employment practices are inclusive.

**5.1** The Employer will take the necessary steps to ensure the availability of accommodation for applicants with disabilities in its recruitment processes.

During the recruitment process the Employer will notify job applicants, when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.

If a request for accommodation is made, the applicant will be consulted in order to provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant’s accessibility needs due to disability.

**5.2** When making offers of employment to new employees, the Employer will inform new employees of the Employer’s policy for accommodating employees with disabilities. This information will be made available in an accessible format or with communication supports upon request.

<b>POLICY:</b>	AODA and Accessibility		
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<b>LAST REVIEW:</b>		<b>REVISED ON:</b>	June 2024

**5.3** The Employer will inform its employees of its practices used to support its employees with disabilities, including but not limited to, the provision of job accommodations that take into account an employee’s accessibility needs due to disability. This information is provided to new employees as soon as practicable and all employees receive updates to any changes to the existing policies on the provision of job accommodation as soon as practicable.

**5.4** The Employer will ensure that all information and communication is available in accessible formats or with communication supports upon request. This includes information that is needed by an employee in order to perform their job and information that is generally available to all employees in the workplace.

**5.5** The Employer has prepared an Emergency Pandemic Plan document in a digitally accessible format that outlines the emergency procedures to ensure the safety of the Employer’s community. In this document, there is information that provides the process and procedures the Employer has implemented to ensure the provision of individualized workplace emergency response information to employees who have a disability, and who have made a request of their need for accommodation due to the disability.

The Employer will only provide workplace emergency response information to those involved in the employee’s individualized plan with consent from the employee with a disability.

The Employer reviews the information in the individualized workplace emergency response plan when the employee moves to a different location, when overall accommodation needs or plans are reviewed, and when general emergency response policies are reviewed.

**5.6** The Employer has in place a process for the development of documented individual accommodation plans for employees with disabilities. This information is available through the *Employer’s AODA and Human Rights Accommodation Policy and Process*. In accordance with the obligations under this standard, the process includes the following elements:

- The manner in which an employee requesting an accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- The manner in which the Employer can request an evaluation by an outside medical or other expert, at the Employer’s expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved;
- The steps taken to protect the privacy of the employee’s personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.

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- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. The individual accommodation plans may include, if requested, any information regarding accessible formats and communication supports and individualized workplace emergency response information.

**5.7** The Employer has HR policies *Leave of Absence* and *Long-term Absence Management*, which are located on the Employer Policy Management platform. These policies outline the steps that the Employer takes to facilitate the return to work of employees who were absent because their disability required them to be away from work, and uses documented individual accommodation plans.

**5.8** The Employer will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when using performance management, career development and advancement and redeployment practices.

## **6.0 Transportation**

The Employer will arrange for accessible transportation of people supported and employees if requested. The Employer will notify the public and/or employees when making transportation arrangements and/or if these arrangements must change.

## **7.0 Built Environment**

**7.1** The Employer is committed to incorporating accessibility standards in the construction of new facilities and during the renovation of existing spaces. The Employer utilizes accessibility standards that create barrier-free access to all spaces, for people supported, employees, and members of the community

**7.2** The Employer provides access to all its programs and services to all people who need it through physical or program accommodations.

**7.3** Entrance ramps are wide enough for use by people who use wheelchairs or other mobility services.

**7.4** Entrance ramps are constructed so that the rise does not exceed one foot for each 12 feet in length.

**7.5** Entrance ramps have non-slip surfaces with rails on one or both sides as required by people who use them.

**7.6** Doorways and corridors are wide enough to accommodate people who use wheelchairs or other mobility devices.

**7.7** Toilet, bathing, and hand-washing facilities are equipped with grab bars and are otherwise accessible.

**7.8** Work surfaces and storage facilities are accessible.

**7.9** Multi-story buildings are equipped to afford access to all levels on which services are provided. If the Employer has multi-story buildings, but all services are provided on the first floor, the remaining floors need not be accessible.



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**7.10** Buildings are equipped with modified features, such as light switches and temperature controls that allow access and can be used by all individuals served.