

## PURPOSE

In 2005, the Government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (AODA) in order to support the full inclusion of individuals with disabilities. It is the goal of the Government of Ontario to make Ontario an accessible province by 2025.

In 2011, the new Integrated Accessibility Standards Regulation (IASR) was enacted under the AODA to help public, private and not-for-profit organizations identify, prevent and remove barriers to accessibility. This policy has been developed in accordance with the AODA Integrated Accessibility Standards Regulation and addresses how the Children's Aid Society of the District of Thunder Bay will achieve accessibility in accordance with the compliance timeframes established by the Regulation.

As a "designated public sector organization", the Children's Aid Society of the District of Thunder Bay must be in compliance with the AODA and the associated Standards: the Accessibility Standards for Customer Service, and the Integrated Accessibility Standards.

The purpose of this Accessibility Policy is to provide a framework to guide the review and development of other CAS Thunder Bay policies, standards, procedures and practices to comply with the standards developed under the Accessibility for Ontarians with Disabilities Act 2005.

## APPLICATION

This policy and its related procedures apply to the following:

- All employees, including full-time, part-time, temporary, casual, and contract staff;
- Volunteers, students, interns;
- Any individual or organization that provides goods, services or facilities to the public or other third parties on behalf of CAS;
- Individuals who are applying for employment with the organization

This policy applies to all CAS Thunder Bay's locations.

#### STATEMENT OF COMMITMENT

The Children's Aid Society of the District of Thunder Bay (CAS Thunder Bay) is committed to providing an environment that is inclusive, that is free of barriers for persons with disabilities, and to treating all persons in a way that allows them to maintain their dignity and independence. CAS Thunder Bay has a shared responsibility with respect to creating an accessible community. We will ensure that the agency's policies and procedures are consistent with the principles of dignity, independence, integration and equality. The provision of services to persons with disabilities will be integrated whenever possible, unless an alternate measure is necessary to enable a person with a disability to access goods or services. CAS Thunder Bay believes in integration and equal opportunity. Individuals with disabilities will be given an opportunity equal to that given to others, to obtain, use or benefit from the services provided by and on behalf of the CAS.

The Children's Aid Society of the District of Thunder Bay is committed to meeting its obligations under the Accessibility for Ontarians with Disabilities Act (AODA) and the associated Standards: the Accessibility Standards for Customer Service, and the Integrated Accessibility Standards.

The requirements set out in this policy and the AODA regulations are not a replacement or substitution for the requirements established under the Ontario Human Rights Code (the Code).

## **GENERAL REQUIREMENTS**

#### Multi-Year Accessibility Plan

In order to achieve our accessibility goals, CAS Thunder Bay has designed a multi-year accessibility plan that:

- Describes the actions CAS Thunder Bay will take to prevent and remove barriers for those with disabilities;
- Addresses the current and future requirements of the AODA

CAS Thunder Bay will review and update the agency's Multi-Year plan at least once every five (5) years and report annually on the progress and implementation of the plan as required on our website (<u>www.thunderbaycas.ca</u>). CAS Thunder Bay will follow the Accessibility Standard's rules to identify, remove and prevent barriers, so that persons with disabilities will have more opportunities to participate in CAS services. The Multi-Year plan will be made available to the public, and will be provided in alternative formats upon request.

#### Training

CAS Thunder Bay will provide appropriate training on the IASR and on the Ontario Human Rights Code to all staff as it relates to people with disabilities.

Training will also be provided to all persons who participate in the development of policies, plans, practices and procedures at CAS Thunder Bay as well as any individuals or organizations that provide goods, services, or facilities on behalf of CAS Thunder Bay.

Training content may vary depending on who is receiving the training, the nature of the services provided, and on individual departmental requirements.

Training will include instruction on the following standards as they relate to the AODA requirements and the IASR:

- The Ontario Human Rights Code
- General Requirements
- Employment Standard
- Information and Communications Standard

Training will be provided as soon as practicable for current staff as well as be incorporated into new employee's initial orientation. Upon completion of training, CAS Thunder Bay will maintain a record of the training provided including the dates on which the training took place and the number of individuals to whom it was provided.

# **EMPLOYMENT STANDARD**

# Recruitment and Retention

CAS Thunder Bay will:

- Notify internal and external job applicants about the availability of accommodations for applicants with disabilities to support their full inclusion in the recruitment process;
- 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;
- Consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's accessibility needs when a selected applicant requests an accommodation;
- Notify successful applicants of our policies for accommodating employees with disabilities when making offers of employment.

## Informing Employees of Supports

CAS Thunder Bay will continue to notify all new and existing employees of the agency's policies for supporting employees with disabilities, including policies on the provision of job accommodations that take into account en employee's accessibility needs due to disability. This information will be provided to new employees, as soon as practicable after they begin their employment and updated information will be provided to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

## Accessible Formats and Communication Supports

When an employee with a disability makes a request, CAS Thunder Bay 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;
- Information that is generally available to all employees in the workplace (i.e., meeting minutes, forms, newsletters etc.) and;
- Consult with the employee making the request in determining the suitability of an accessible format or communication support.

Accommodation requests should, whenever possible, be made in writing. The accommodation request should indicate:

- The Code ground the accommodation is being requested on;
- The reason accommodation is required, including enough information to confirm the existence of a need for accommodation;
- The specific needs related to the Code ground

All accommodation requests will be taken seriously. No person will be penalized for making an accommodation request.

CAS Thunder Bay is committed to maintaining the confidentiality of information related to an accommodation request and will only disclose this information with the consent of the employee or applicant.

If the employee already has an individual accommodation plan, then the accessible formats and/or communication supports that will be provided to the employee will be included in the plan.

## Workplace Emergency Response Information

CAS Thunder Bay will provide individualized workplace emergency response information to employees with disabilities if the disability is such that the individualized information is required and CAS Thunder Bay has been informed of the need for accommodation due to the employee's disability. In addition, this information shall be provided, with the employees consent, to the person designated to provide assistance.

The information in the individualized workplace emergency response information will undergo review when the employee moves to another department or location within the organization, when overall accommodation needs or plans are reviewed, and when CAS Thunder Bay reviews its general emergency response policies.

# Accommodation Process and Individual Accommodation Plans (IAP)

CAS Thunder Bay will incorporate new accessibility requirements under the IASR to its disability accommodation and return to work policy and processes. CAS Thunder Bay will develop individualized accommodation plans for its employees with disabilities as CAS Thunder Bay becomes aware.

The Manager, the person requesting accommodation related to a Code ground and, where appropriate, the Human Resources Manager and any necessary experts will work together to develop an Accommodation Plan for the individual.

The Accommodation Plan, when agreed on, will be put into writing, and signed by the individual requesting accommodation, the Manager, and the Human Resources Manager. CAS Thunder Bay will ensure that the process for the development of documented individual accommodation plan includes:

- The manner of the employee's participation in the development of the IAP
- The means of assessment on an individual basis
- Identification of accommodations to be provided
- Clear timelines for providing the accommodation
- A statement of the employee's relevant limitations and needs, including any assessments and information from experts or specialists, while maintaining the confidentiality of medical reports
- Union representatives for the employee, upon request or another CAS Thunder Bay colleague, as deemed appropriate
- Steps taken to protect the privacy of the employee's personal information
- Frequency that the IAP will be reviewed and updated and the manner in which it will be done
- If IAP is denied, the reasoning for the denial is provided to the employee
- The IAP be provided in a format that takes into account the employee's disability needs;
- Individualized workplace emergency response information, if necessary
- Identification of any other accommodation that is to be provided

The Manager and the person receiving accommodation will monitor the success of the accommodation plan, and promptly address any deficiencies or any relevant changes in the workplace or the employee's needs.

#### Return to Work

CAS Thunder Bay shall have in place a documented return to work process for employees returning to

work due to disability and requiring disability-related accommodations. These processes will outline the steps that CAS Thunder Bay will take to facilitate return to work.

Performance Management, Career Development and Advancement, and Redeployment CAS Thunder Bay will continue to consider the accessibility needs of employees with disabilities as well as any individual accommodation plans for employees when:

- Using performance management reviews and processes;
- Providing career and professional development to employees
- Using redeployment procedures

# INFORMATION AND COMMUNICATION STANDARD

#### Accessible Formats and Communication Supports

Upon request and consultation, CAS Thunder Bay will endeavour to provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. This includes emergency procedures, plans, or public safety information.

Accessible formats and communication supports for persons with disabilities will be provided:

- Upon request, in a timely manner that takes into account the person's accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- In consultation with the person making the request to determine the suitability of an accessible format or communication support

If it is determined that information or communications are unconvertible, CAS Thunder Bay shall provide the person requesting the information or communication with:

- An explanation as to why the information is unconvertible
- A summary of the unconvertible information or communications

## Feedback

CAS Thunder Bay will ensure that our processes for receiving and responding to feedback are made available to persons with disabilities in accessible formats and with communication supports upon request. Members of the public, service users, and employees will be notified of the availability of such an option.

Members of the public can provide feedback through CAS Thunder Bay's website by submitting our online feedback form, found on the left hand navigation bar under Accessibility (<u>Accessibility Feedback Form</u> <u>Link</u>).

#### Accessible Websites and Web Content

CAS Thunder Bay has ensured that our website and web content is in compliance with the Web Content Accessibility Guidelines (WCAG) 2.0 Level A as of December 2013.

CAS Thunder Bay will ensure that our website, web content and applications will be in conformity with WCAG 2.0 Level AA, as required by the IASR by January 1, 2021 as practicable.

## **APPENDIX A: DEFINITIONS**

Accessible Formats	An alternative to standard print and 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 augmented communication supports, plain language, sign language and other supports that facilitate effective communications
Disabilities	Shall mean the same as the definition of disability found in the Ontario Human Rights Code:
	<ul> <li>A) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,</li> <li>B) A condition of mental impairment or a developmental disability</li> <li>C) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language</li> <li>D) A mental disorder or</li> </ul>
	E) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
Individual Accommodation Plan	A plan developed by CAS Thunder Bay in conjunction with an employee with a disability that documents the accommodations that will be provided so the employee can do their job. These plans are living documents and are to be reviewed regularly
Individualized Workplace Emergency Response Information	Refers to the information prepared by CAS Thunder Bay, in consultation with employees who have disabilities, to help them prepare for emergencies such as fire, severe weather, and power outages
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 and is accessible to the public

Redeployment	Means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.
Unconvertible	Means
	<ul> <li>A) It is not technically feasible to convert the information or communications</li> </ul>
	B) The technology to convert the information or communications is not readily available
<i>Web Content Accessibility Guidelines (WCAG)2.0</i>	The World Wide Web consortium recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0. It is an international standard for making websites and web content accessible to a broader range of users with disabilities. WCAG 2.0 Level A and Level AA refer to a series of technical checkpoints that make websites and their content increasingly accessible. Level AA builds on Level A's checkpoints.