

**MULTI YEAR ACCESSIBILITY PLAN**



The Children's Aid Society  
of the District of Thunder Bay

Revised: December 2017

## **Introduction**

Accessibility benefits everyone. Planning in advance and making accessibility a part of the Children's Aid Society of the District of Thunder Bay (hereinafter referred to as the CAS) will increase the opportunity to improve services in a fiscally responsible manner. In accordance with the CAS obligations under the AODA, Integrated Accessibility Standards Regulation (Ontario Regulation 191/11, section (1) (2)), the CAS has developed a Multi-Year Accessibility Plan. This plan contains the strategy and activities that will be put into practice over the next few years.

## **Overview of Accessibility Policy**

In 2005, the Ontario Government passed the Accessibility for Ontarians with Disabilities Act to make Ontario accessible by 2025. The Accessibility Standard for Customer Service was the first standard to become law. The next four standards – Information and Communications, Employment, Transportation, and Design of Public Spaces – have been combined under one regulation, the **Integrated Accessibility Standards Regulation**. This regulation is now law and the requirements currently in regulation are being phased in between 2011 and 2021. The Integrated Accessibility Standards Regulation also establishes the compliance framework for obligated organizations. To do so, mandatory and enforceable standards have been implemented. The CAS must implement the following Standards:

### Customer Service Standard

- Establish as regulation 429/07 on January 1, 2008
- Requirements include development of policies, practices, and procedures that the provision of training for staff and volunteers who interact with the public

### Integrated Accessibility Standard

- Established as regulation 191/11 on July 1, 2011
- Brings together four standard areas in one proposed Regulation: Information and Communications, Transportation, Employment, and Design of Public Spaces

## **CAS Statement of Commitment**

The CAS will develop a statement of commitment which establishes the vision and the goals for the agency regarding accessibility. The regulation requires the CAS to develop, implement and maintain one or more written documents which will outline how it intends to comply with the accessibility requirements of the regulation. By creating partnerships with the local community, the CAS will become more aware of the requirements of people with both visible and invisible disabilities, so that the agency may better understand and respond to their needs. The CAS will be required to make documents available to the public and to employees, and will ensure that all documents be available in an accessible format upon request.

The CAS is committed to treating all persons in a way that allows them to maintain their dignity and independence. The CAS has a shared responsibility with respect to creating an accessible community. The CAS 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. The CAS 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.

### **Availability and Format of Documents**

The CAS will maintain its accessibility policies and Multi-Year Accessibility Plan in written format. These documents will be available to the public and will be provided in an accessible format if requested. The CAS will also provide accessible formats of the agency's accessibility policies and plans to its employees.

### **Multi-Year Accessibility Plan**

The CAS's Multi-Year Accessibility Plan describes the actions the CAS will take to prevent and remove barriers, and when it will do so. This plan creates a road map for an organization to increase accessibility. The CAS will sustain its Multi-Year Accessibility Plan, and the plan will be reviewed and updated at least once every five years. The CAS 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 Accessibility Plan will be made available to the public and will be provided in an accessible format when requested. The information of the CAS Accessibility Plan will be a multi-phased process.

### **Purposes of the Accessibility Plan**

The Accessibility Plan outlines the policies and actions that the CAS will put in place to identify, remove and prevent barriers to provide better opportunities for persons with disabilities.

This Multi-Year Plan includes:

- Actions the CAS have taken to remove barriers
- Processes by which the CAS has identified, removed, and prevented barriers to persons with disabilities
- Course of action the CAS will be taking to recognize, eliminate, and prevent barriers to persons with disabilities
- The monitoring process for the Accessibility Plan and
- Actions to be taken to communicate the CAS Accessibility Plan to the public and to those individuals who interact with the public and to those individuals who interact with the public on behalf of the agency (i.e., employees, volunteers, students)

The 2013 Accessibility Plan has been prepared in accordance with the requirements of the AODA, 2005.



**Customer Service Standard – Multi Year Plan**

AODA REGULATION				CAS PLAN OF ACTION	
Section	Initiative	Regulation Description	Compliance Date	Action	Status
3	Establishment of policies, practices, and procedures	3.1 Organizations that provide goods or services shall establish policies, practices and procedures governing the provision of its goods or service to persons with disabilities	January 1, 2012	Customer Service Standard Policy approved and posted on agency website December 2011	Complete
		3.2 Organizations shall use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following:		CAS reviewed the Customer Service Standard Policy to determine whether they met the requirements within the regulation 429/07 in October 2013	Complete
		a) The goods or services must be provided in a manner that respects the dignity and independence of persons with disabilities		CAS Customer Service Standard revised policy posted on agency website December 2013	Complete
		b) That persons with disabilities must be given equal opportunity to that given to others		CAS will provide copies of this policy in alternative formats upon request	Complete
4	Use of service animals and support persons	4.1 If a person with a disability is accompanied by a guide dog or other service animal, organizations shall ensure that the person is permitted to enter the premises with the animal and to keep the animal with them unless the animal is excluded by law from the premises	January 1, 2012	Incorporated this section into the Customer Service Standard Policy in December 2011 and revised in December 2013 to provide more information regarding the use of service animals and assistive devices	Complete
				Posted the Customer Service Standard Policy on the agency website December 2013	Complete



		<p>4.2 If the animal is excluded by law from the premises, organizations shall ensure other measures are available to enable the person with a disability to obtain, use or benefit from the services</p> <p>4.3 If a person with a disability is accompanied by a support person, organizations shall ensure that both persons are permitted to enter the premises together while accessing goods or services in premises open to the public or third parties</p> <p>4.4 Organizations shall ensure that notice is given in advance about any fee for admission to premises in respect to the support person</p> <p>4.5 Designated public sector organizations or organizations of at least 20 employees in Ontario shall create documents describing its policies, practices, and procedures with respect to the matters governed by this section, and upon request, shall give a copy of a document to any person</p>		<p>If a support person accompanies a service user who has a disability, CAS will ensure that both people are permitted to enter any CAS premises</p> <p>CAS will provide copies of this policy in alternative formats upon request</p>	<p>Complete</p> <p>Complete</p>
5	Notice of temporary disruptions	5.1 Organizations shall provide public notice, in a conspicuous location, on their website, or by any other reasonable methods, when facilities or services that people with	January 1, 2012	Incorporated this section into Customer Service Standard Policy in December 2011 and revised December 2013	Complete



		<p>disabilities rely on to access or use our goods or services are temporarily disrupted</p> <p>5.2 Notice of the disruption must include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services if available</p> <p>5.3 Designated public sector organizations and organizations of at least 20 employees in Ontario shall create a document that describes the policies, procedures and practices for a temporary disruption and, upon request, shall give a copy of the document to any person</p>		<p>Communication about temporary disruptions was provided to all service areas on this obligation</p> <p>CAS will ensure all agency switchboard messaging includes directions for assistance if office(s) are closed</p> <p>CAS will ensure disruptions in service are posted on agency website, main public entrances, service counters, and by any other method deemed reasonable under the circumstances</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p>
6	Training for staff	<p>6.1 Organizations shall ensure that the following persons receive training about the provision of its goods and services to persons with disabilities:</p> <ul style="list-style-type: none"> <li>a) Persons who deal with members of the public or other third parties on behalf of the provider governing the provision of the goods and services; and</li> <li>b) Persons who participate in developing the policies, practices and procedures governing the provision of goods and services to the</li> </ul>	January 1, 2012	CAS will provide training on the Customer Service Standard Regulation to all employees, volunteers, and students	Complete



		<p>public or other third parties</p> <p>6.2 Training must include a review of the purposes of the Act, requirements of the Regulation, and instruction on the following matters:</p> <ul style="list-style-type: none"> <li>a) How to communication with persons with various types of disability</li> <li>b) How to interact with persons who require assistive devices, service animals or assistance of a support person</li> <li>c) What to do if a person with a disability is having difficulty accessing the organization's goods or services</li> </ul> <p>6.3 Training must be provided to each person as soon as practicable and should be provided on an ongoing basis to reflect any changes to policies, practices and procedures</p> <p>6.4 Designated public sector organizations and organizations of at least 20 employees in Ontario shall keep records of the training provided, including the dates on which the training is provided and the number of individuals who participated</p>		<p>CAS will integrate the Customer Service Standard training requirements into the HR hiring practices for employees and training will be ongoing in connection to any changes made to policies and procedures governing the provision of goods and services to persons with disabilities</p> <p>CAS will keep a master record of training file, which will be kept in Human Resources, for training provided on the Customer Service Standard and will include training dates and to whom the training was provided</p>	<p>Ongoing</p> <p>Ongoing</p>
--	--	--	--	--	-------------------------------



7	Feedback Process	<p>7.1 Organizations shall establish a process for receiving and responding to feedback about the manner in which it provides goods or services to persons with disabilities and shall make information about the process available to the public</p> <p>7.2 The feedback process must permit persons to provide their feedback in person, by telephone, in writing, or by delivering an electronic text by email or on diskette or otherwise</p> <p>7.3 The feedback process must specify the actions that the organization is required to take if a complaint is received</p> <p>7.4 Designated public sector organizations and organizations of at least 20 employees in Ontario shall prepare a document describing its feedback process and, upon request, shall give a copy of the document to any person</p>	January 1, 2012	<p>Incorporated this section into Customer Service Standard Policy in December 2011 and revised December 2013</p> <p>Service user feedback form was developed and posted on the agency website in December 2013</p> <p>Complaints will be accepted by mail, fax, email, telephone, or electronic format</p> <p>Feedback form includes the actions the CAS is required to take upon receipt of a complaint</p> <p>CAS will provide copies of this policy and the feedback form in alternative formats upon request</p>	<p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p> <p>Complete</p>
8	Notice of availability of documents	8.1 Designated public sector organizations and organizations of at least 20 employees in Ontario shall notify persons to whom it provides goods or services that the documents can be provided in an accessible	January 1, 2012	Incorporated this section into Customer Service Standard Policy in December 2011 and revised December 2013	Complete





		<p>format upon request</p> <p>8.2 The notice may be given by posting the information at a conspicuous place on premises owned or operated by the organization, by posting it on the organization's website, if any, or by such other method as is reasonable in the circumstances</p>		<p>When providing documents required under the Customer Service Standard to a person with a disability, CAS will provide the information in a format that takes into account the person's disability</p> <p>All documents produced by CAS will be available in alternative formats upon request</p>	<p>Complete</p> <p>Complete</p>
9	Format of documents	<p>9.1 Organizations that provide goods or services shall provide a copy of a document, or the information contained in that document, to a person with a disability in a format that takes into account a person's disability</p> <p>9.2 Organizations and the person with a disability may agree upon the format to be used for the document or information</p>	January 1, 2012	<p>All documents produced by CAS will be available in alternative formats upon request</p> <p>CAS accessibility request form updated December 2013 and posted on agency website</p>	<p>Complete</p> <p>Complete</p>



**Integrated Accessibility Standard – Multi Year Plan  
Part I – General Requirements**

AODA REGULATION				CAS PLAN OF ACTION	
Section	Initiative	Regulation Description	Compliance Date	Action	Status
3	Establishment of Accessibility Policies	3.1 Organizations shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards	January 1, 2014	Accessibility policy approved	Complete
		3.1 Policies will include a statement of commitment to meet accessibility needs of persons with disabilities in a timely manner		Statement of Commitment included in policy	Complete
		3.2 Policies will be publicly available and will be provided in accessible formats upon request		Accessibility policy to be posted by January 2016	Complete
4	Accessibility Plans	4.1 Large organizations shall develop a multi-year accessibility plan, outlining the organization's strategy to prevent and remove barriers to accessibility	January 1, 2014	A multi-year accessibility plan, including a statement of commitment, was drafted December 2013	Complete
		4.2 Post the accessibility plan on the external website and provide it in accessible formats upon request		The multi-year accessibility plan was posted on both the external CAS website and the employee intranet December 2013	Complete



		4.3 Review and update the accessibility plan in consultation with persons with disabilities or an Accessibility Advisory Committee at least once every five years		CAS will regularly review and update the multi-year accessibility plan to reflect current practices of the organization	Ongoing
				CAS will regularly review and update any accommodation plans with persons with disabilities to reflect current needs	Ongoing
7	Training	7.1 Organizations shall ensure that training is provided on the requirements of the accessibility standards referred to in the AODA and on the Ontario Human Rights Code as it pertains to persons with disabilities to, <ul style="list-style-type: none"> <li>a) all employees and volunteers;</li> <li>b) all persons who participate in developing the organization's policies; and</li> <li>c) all persons who provide goods, services or facilities on behalf of the organization</li> </ul>	January 1, 2015	Design and deliver training to all CAS staff and volunteers by January 2016  A record of dates in which the training is provided, and the number of individuals to whom it is provided will be kept by the CAS  Training will be ongoing with respect to any changes in the regulation	Complete  Complete  Ongoing



**Integrated Accessibility Standard – Multi Year Plan  
Part II – Information and Communications Standard**

AODA REGULATION				CAS PLAN OF ACTION	
Section	Initiative	Regulation Description	Compliance Date	Action	Status
11	Feedback	11.1 Organizations shall ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports upon request	January 1, 2015	Feedback form developed and posted on external website December 2013; form includes actions the CAS is required to take upon receipt of a complaint	Complete
				Determine what accessible formats and communication supports will be provided upon request	Ongoing
				Ensure employees and management team are aware of the need to provide accessible formats upon request	Complete
12	Accessible Formats & Communication Supports	12.1 Organizations shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, a) in a timely manner that takes into account the person's accessibility needs due to disability; and b) b) at a cost that is no more than the regular cost charged to other persons  12.2 Organizations shall consult with the person making the request in determining the suitability of an	January 1, 2016	Determine what accessible formats and communication supports will be provided to persons with disabilities upon request	Ongoing
				Develop processes to ensure formats and supports can be provided in a timely manner by summer 2016	Complete
				CAS will communicate to employees and management that there will be no additional charges for accessible formats through training November 2015	Complete



		<p>accessible format or communication support</p> <p>12.3 Organizations shall notify the public about the availability of accessible formats and communication supports</p>		<p>CAS will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communication systems and platforms are provided in accessible formats that meet the needs of persons with disabilities</p>	Ongoing
13	Emergency Procedures, Plans or Public Safety Info	<p>13.1 If an organization prepares emergency procedures, plans or public safety information and makes the information available to the public, the obligated organization shall provide the information in accessible formats or with appropriate communication supports, as soon as practicable, upon request.</p>	January 1, 2012	<p>CAS employees who have a service user or visitor are accountable for them during evacuation, thus if a visitor requires assistance during evacuation their CAS employee will escort them to an area of safety as per the Agency's policy</p>	Ongoing
14	Accessible Websites & Web Content	<p>14.1 Designated public sector organizations and large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA, shall do so in accordance with the schedule set out in this section.</p>	<p>January 1, 2014 WCAG 2.0 Level A</p> <p>January 1 2021 WCAG 2.0 Level AA</p> <p><i>with the exception of Live Captions and Audio Description</i></p>	<p>CAS website and web content was assessed for accessibility for persons with disabilities and conform to WCAG 2.0 level A as of December 2013</p> <p>CAS will continuously review the WCAG 2.0 Level AA guidelines to be informed of updates to the Standard and ensure the CAS website and web content is compliant with level AA by January 2021</p>	<p>Complete</p> <p>Upcoming</p>



**Integrated Accessibility Standard – Multi Year Plan  
Part I – Employment Standard**

AODA REGULATION				CAS PLAN OF ACTION	
Section	Initiative	Regulation Description	Compliance Date	Action	Status
22	Recruitment General	22.1 Organizations shall notify its internal and external job applicants, that accommodations for persons with disabilities will be provided on request to support their participation in all aspects of the recruitment process	January 1, 2016	Identify and implement best practices for internal and external communication of availability of accommodation upon request for the recruitment process i.e., on internal and external career postings	Ongoing
23	Recruitment, Assessment or Selection Process	23.1 During the recruitment process, an employer shall notify job applicants who have been invited to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes used	January 1, 2016	CAS will develop scripting to insert on all advertisements and job postings both internally and externally to ensure applicants are aware of the availability of accommodations upon request	Complete
		23.2 If a selected applicant requests an accommodation, employers shall consult with the applicant in order to provide or arrange for the provision of a suitable accommodation in a manner that takes into account a person's accessibility needs due to disability		Create a process for consultation and applicant participation to identify and remove barriers and ensure timely provision of suitable accommodation	Ongoing



24	Notice to Successful Applicants	24.1 Organizations shall notify applicants of their policies for accommodating employees with disabilities when offering employment	January 1, 2016	During first day of employment, notify and inform individuals of accessibility and modified work policies, and EFAP program	Complete
25	Informing Employees of Supports	<p>25.1 Organizations shall inform new and existing employees of their policies for supporting 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</p> <p>25.2 Organizations shall provide updated information to its 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</p>	January 1, 2016	<p>Develop an Accessibility Policy to inform new and existing employees of the supports available for employees with disabilities, including employment-related accommodations</p> <p>Incorporate accessibility commitment and training in new hire orientation process</p> <p>Develop and implement a process to notify employees of policy changes</p>	<p>Complete</p> <p>Complete</p> <p>Ongoing</p>
26	Accessible Formats & Communication Supports	<p>26.1 Organizations will consult with their employees who have disabilities in order to provide them with the accessible formats and communication supports for</p> <p>a) Information that is needed in order to perform the employee's job; and</p> <p>b) Information that is generally available to employees in the workplace</p>	January 1, 2016	Create an Accessibility policy that will include processes to consult with employees who have disabilities	Complete



		26.2 Organizations shall consult with the employee making the request in determining the suitability of an accessible format and communication support		Will consult with employees when determining what supports they will require	Ongoing
27	Workplace Emergency Response Information	<p>27.1 Organizations shall provide individualized workplace emergency response information to employees who have a disability, if the disability is such that</p> <ul style="list-style-type: none"> <li>a) The individual information is necessary</li> <li>b) The employer is made aware of the need for accommodation due to the employee's disability</li> </ul> <p>27.2 If an employee with an individualized emergency response information plan requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated to provide assistance to the employee</p> <p>27.3 Organizations shall review the individualize workplace emergency response information</p> <ul style="list-style-type: none"> <li>a) When the employee moves to a different location in the organization</li> <li>b) When the employee's overall</li> </ul>	January 1, 2012	<p>Employees surveyed in October 2013 re: need for individualized workplace response plan</p> <p>Generate a form for workplace emergency response plan information to be recorded as part of the individualized accommodation plan forms</p> <p>Employees to inform Manager of their need for assistance in emergencies</p> <p>CAS will determine, with the participation of the employee, whether the employee requires a designate in case of emergencies using the workplace emergency response plan form, and, with the employees consent, inform their designate of the plan</p> <p>If employee changes status within the Agency, it is manager's responsibility to update the plan with the employee</p> <p>When JOHSC reviews emergency response policies and procedures, will be responsible for communicating the update</p>	<p>Complete</p> <p>Complete</p> <p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>





		<p>accommodation needs or plans are reviewed</p> <p>c) When the employer reviews its general emergency response policies</p>		<p>to staff and managers so that individual workplace response plans may be updated accordingly</p>	
28	Documented Individual Accommodation Plans	<p>28.1 Organizations shall have a written process for developing documented individual accommodation plans for employees with disabilities</p> <p>28.2 The following elements shall be included in the process for developing documented individual accommodation plans</p> <p>a) The manner by which an employee requesting an accommodation plan can participate in the process of developing the plan</p> <p>b) The manner in which the employer can request an evaluation by an outside medical or other expert to determine how accommodation can be achieved, at the employer's expense</p> <p>c) The manner in which the employee can request the participation of a representative from their bargaining unit in the development of the plan</p> <p>d) The manner in which the</p>	January 1, 2016	<p>Accommodation Policy for the Agency will include the process to create and document individual accommodation plans where needed and will be updated on a regular basis</p> <p>Create a template individual accommodation plan package and post a master copy on the intranet for managers to utilize when needed for employees</p>	<p>Complete</p> <p>Complete</p>



		<p>privacy of the employee's personal information is protected</p> <p>e) The frequency with which the individual accommodation plan will be reviewed and updated</p> <p>f) If an individual accommodation plan is denied, the manner in which the reasons for denial will be communicated to the employee</p> <p>g) The means of providing an individual accommodation plan in a format that takes into account the employee's accessibility needs</p>			
29	Return to Work Process	<p>29.1 Organizations shall develop, outline and have in place a return to work process for its employees who have been absent from work due to a disability and require disability related accommodations in order to return to work</p> <p>29.2 The return to work process shall</p> <p>a) Outline the steps the employer will take to facilitate the return to work of employees who were absent due to a disability and;</p> <p>b) Utilize the individual accommodation plans as described in section 28 as part of the process</p>	January 1, 2016	<p>Review and update current return to work policy and procedure to document steps to help employees return to work after a disability-related leave of absence</p> <p>Review and update current return to work process to incorporate the utilization of individual accommodation plans when needed</p>	<p>Complete</p> <p>Complete</p>



		29.3 The return to work process outlined in this section does not replace or override any other return to work process created by or under any other statute			
30	Performance Management	30.1 Organizations that use performance management shall consider the accessibility needs of employees with disabilities, as well as individual accommodation plans when using its performance management process	January 1, 2016	<p>Review and update current process for providing performance feedback to ensure accessibility needs can be met and individual accommodation plans are considered</p> <p>Ensure that documents related to performance management are available in accessible formats upon request for employees with disabilities</p> <p>Provide formal and informal coaching and feedback in a manner that takes into account an employee's accessibility needs</p>	<p>Ongoing</p> <p>Ongoing</p> <p>Ongoing</p>
31	Career Development & Advancement	31.1 Organizations that provide career development and advancement to its employees shall consider the accessibility needs of employees with disabilities when providing career development and advancement opportunities	January 1, 2016	Review and update current processes for providing career development and advancement to ensure accessibility needs can be met and individual accommodation plans are considered	Ongoing



32	Redeployment	32.1 Organizations that use redeployment processes shall consider the accessibility needs of employees with disabilities when moving them to different positions, so that employees can continue to have their accommodation needs met	January 1, 2016	Review and update current redeployment processes and refer to employees individual accommodation plans to determine what modifications may be required to accommodate the employee in their new job	Ongoing
----	--------------	--	-----------------	---	---------