

 <p>Tri-County Mennonite Homes</p>	<p>AODA Integrated Accessibility Standards</p>	<p>POLICY #: III-J-10.00 PAGE: 1 of 8</p>
<p>MANUAL III-People</p>		<p>APPROVED BY: Executive Director</p>
<p>ORIGINAL ISSUE: January 8, 2020 PAST REVISIONS: January 15, 2021</p>		<p>CURRENT REVISION: January 15, 2021</p>

1. PURPOSE

The purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) is to achieve an accessible Ontario by 2025, by identifying, removing and preventing barriers in key areas of daily living: customer service; employment; information and communications; transportation; and the design of public spaces.

On January 1, 2008, the **Customer Service Standard** (Ontario Regulation 429/7), became the first Accessibility Standard under the AODA. This Standard sets out requirements to achieve accessible **customer service**. Accessible customer service is about understanding that customers with disabilities may have different needs and finding the best way to help them access goods and services.

On June 3, 2011, The Integrated Accessibility Standards Regulation (IASR), Ont. Reg. 191/11 (“Regulation”), harmonized the **Information and Communication, Employment, Transportation; Design of Public Spaces; and Customer Service**.

The purpose of this Policy is to identify and document how Tri-County Mennonite Homes (TCMH), currently achieves accessibility by meeting the requirements of the AODA and how it will continue to work towards improving accessibility for persons with disabilities.

2. STATEMENT OF COMMITMENT

In accordance with the requirements under the AODA, TCMH is committed to removing and preventing barriers for persons with disabilities, in a manner that respects their dignity and independence.

3. APPLICATION

Unless otherwise limited herein, the Policy applies to all:

- i. employees and volunteers;
- ii. persons who provide goods, services and/or facilities to residents, their families, and friends, the public or other third parties on behalf of TCMH; and
- iii. persons responsible for the development of TCMH policies.

This Policy does not replace or affect existing legal obligations under the *Human Rights Code* R.S.O. 1990, c. H.19, as it may be amended from time to time, or any other applicable laws respecting the accommodation of persons with disabilities.

4. IMPLEMENTATION

Responsibility for the implementation of the Policy is shared between the Chief Executive Office and the Executive Directors across TCMH.

5. GENERAL ACCESSIBILITY STANDARDS

I. Customer Service Standards

TCMH will:

- 1) Identify and remove barriers in order to provide customer service that is more accessible to people who have disabilities.
- 2) Provide assistive devices where reasonable and necessary.
- 3) Communicate with persons with disabilities in a manner that takes into account the person's disability.
- 4) Welcome persons with disabilities who are accompanied by a service animal to the residence, office, or building to which the public has such access and where the animal is not otherwise excluded by law or for health and safety reasons.
- 5) Permit support persons to accompany visitors with disabilities to all areas that are open to the public.
- 6) Permit the use of personal assistive devices or technologies in an unrestricted manner in all areas of the residence, office, or building to which residents, family members, vendors, customers, volunteers, students, independent operators, contractors, sub-contractors, or team members have access, except when subject to operator or resident safety and/or business integrity.
- 7) Provide information on Service Disruptions to persons with disabilities who might be affected by the disruption and identify the reason for the disruption, its duration, and information about alternative services. Notice may be given by posting the information in a conspicuous place or by other means. Upon request, TCMH will provide a copy of the information in an accessible format.

II. Accessibility Plan

- a) TCMH has developed a **Multi-Year Accessibility Plan**, which outlines the Company's strategy to prevent and remove barriers for persons with disabilities and meet the requirements of the IASR. TCMH will maintain the Accessibility Plan in accordance with the requirements of the *Integrated Accessibility Standards*. The Accessibility Plan will be reviewed and updated at least once every five (5) years.

The Accessibility Plan will be made available in an Accessible Format upon request.

III. Training

TCMH will provide training about the provision of its goods or services to persons with disabilities as soon as practicable, to all employees, volunteers, agents, contractors and others who could reasonably be expected to:

- Interact with the public on our behalf; or
- Influence the development of policies, practices and procedures

Training will be provided on:

- i. the requirements of the *Integrated Accessibility Standards*;
- ii. the *Human Rights Code* as it pertains to persons with disabilities; and
- iii. the AODA Policies as required by the *Integrated Accessibility Standards*.

The content of the training will be applicable to the individual's duties.

TCMH will keep records of the training provided.

6. INFORMATION AND COMMUNICATION STANDARDS

The Information and Communication Standards do not apply to:

- i. products and product labels;
- ii. Unconvertible information or communications; and
- iii. information that TCMH does not control directly or indirectly through a contractual relationship.

Should TCMH determine that information or a communication is unconvertible, it will explain why and provide the person making the request with a summary of the said information or communication.

I. Feedback Procedures

TCMH will ensure that its processes for receiving and responding to feedback, are accessible to persons with disabilities, by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request. A variety of methods used for feedback will include:

- Phone
- In person
- Fax
- Email/website
- Feedback forms are available at each location.

TCMH will notify the public that Accessible Formats and Communications Supports are available in respect of its feedback procedures.

II. Accessible Formats & Communication Supports

TCMH will, upon request, provide or arrange for the provision of Accessible Formats and Communication Supports in order to make its communications or information about the goods, services and/or facilities it offers accessible to persons with disabilities.

Accessible Formats and Communication Supports will be provided in a timely manner and at a cost that is no more than the regular cost charged to other persons.

TCMH will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support and will notify the public of the availability of same.

III. Emergency Plans, Procedures or Public Safety Information

As of Jan 1, 2012, TCMH provides any emergency plans, procedures or public safety information that it makes available to the public, in an Accessible Format or with appropriate Communication Supports, as soon as practicable, upon request.

IV. Accessible Websites and Web Content

TCMH ensures that, where practicable, a New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

Final Website Compliance Deadline: January 1, 2021

By the Final Website Compliance Deadline, TCMH will ensure that, where practicable, any website or content on that site published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section is practicable, TCMH will consider the availability of commercial software or tools required to achieve web accessibility;

The commitment to provide accessible websites and web content only applies to websites and web content that TCMH controls directly or indirectly through a contractual relationship that allows for modification of the website or web content in question.

7. EMPLOYMENT STANDARDS

The Employment Standards only apply to employees of TCMH. They do not apply to volunteers, other unpaid individuals or contractors.

I. Recruitment/Selection/Assessment:

TCMH will notify the public and employees of the availability of accommodation for job applicants during the recruitment process.

TCMH will further notify all job applicants who are individually selected to participate in an assessment or selection process, that accommodation is available upon request, if the applicant requires accommodation due to a disability.

If an applicant requests accommodation, TCMH will consult with the applicant and provide or

arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs.

Refer to Recruitment and Selection Process (III-A-10.00) and Accessibility Interviewing Checklist (III-A-10.00(a)).

II. Notice to Successful Applicants

TCMH ensures that when making offers of employment, it notifies the successful applicant of its policies on accommodating employees with disabilities.

III. Informing Employees of Supports

TCMH will inform its existing and new employees of its policies on 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.

TCMH will provide employees with updated information whenever there is a material change to its policies on the provision of job accommodations for employees with disabilities.

IV. Accessible Formats and Communication Supports for Employees

TCMH will, upon the request of an employee with a disability, provide or arrange for the provision of Accessible Formats and Communication Supports in order to ensure that (i) information required by the employee to perform his/her job; and (ii) information generally available to employees in the workplace, is accessible to the employee with a disability.

TCMH will consult with the employee making the request to determine the suitability of any Accessible Format or Communication Support. However, TCMH reserves the right to determine the Accessible Format or Communication Support that will be provided in the circumstances.

V. Workplace Emergency Response Information

If an employee has a disability and TCMH is aware that, due to that disability, the employee requires an individualized workplace emergency response, information addressing such response will be provided to the employee as soon as practicable. In such a case, with the employee's consent, TCMH will designate a colleague(s) to provide such individualized assistance and will ensure that this colleague is provided with a copy of employee's individualized emergency response information.

TCMH will review the individualized workplace emergency response information when, for example, the employee moves to a different work location.

Refer to Employee Emergency Information Worksheet (III-J-10.00(a)) and Employee Emergency Response Plan (III-J-10.00(b))

VI. Documented Individual Accommodation Plans

TCMH will have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

Where requested, an employee's individual accommodation plan will include any information regarding the provision of Accessible Formats and Communications Supports.

Where required, an employee's individual accommodation plan will include individualized workplace emergency response information as described in section V.

Refer to Individual Accommodation Process (III-J-10.10) and Individual Accommodation Plan (III-J-10.10(a)).

VII. Return to Work Process

TCMH will document a return to work process for its employees who have been absent from work due to a disability and who require disability-related accommodations in order to return to work.

The return to work process will outline the steps TCMH will take to facilitate the employee's return to work and will use the documented individual accommodation plans described in section VI.

Refer to Early & Safe Return to Work Program (IV-F-10.00) and Early & Safe Return to Work Program (non-occupational) (IV-H-10.00)

VIII. Performance Management

TCMH will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when applying its performance management process.

Refer to Performance Reviews (III-E-10.30).

IX. Career Development and Advancement

TCMH will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing opportunities for career development and advancement to its employees with disabilities.

X. Redeployment

TCMH will take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.

8. DESIGN OF PUBLIC SPACES STANDARDS

TCMH will comply with the accessibility requirements of the Design of Public Spaces Standards when redeveloping or constructing new public spaces on or after January 1, 2017. For further information on existing or planned projects to redevelop or construct new public spaces see TCMH' Accessibility Plan.

9. QUESTIONS ABOUT THIS POLICY

For more information about the Policy or TCMH' Accessibility Plan please contact Corporate Services at 519-662-2718

10. DEFINITIONS

- i. **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.
- ii. **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.
- iii. **Disability** - means:
 - 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,
 - b) a condition of mental impairment or a developmental disability,
 - c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
 - d) a mental disorder, or
 - an injury or disability for which benefits were claimed or received under the insurance plan established under the [Workplace Safety and Insurance Act, 1997](#)
- iv. **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- v. **Performance Management** - means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- vi. **Redeployment** - means the reassignment of employees to other departments or jobs as an alternative to layoff, when a particular job or department has been eliminated.
- vii. **Unconvertible Information or Communication** - means information or communication that it is not technically feasible to convert, or if it is technically feasible to convert, the technology required to do so is not readily available.
- viii. **Web Content Accessibility Guidelines ("WCAG")** - means the international standard for making websites and web content accessible to people with a wide-range of disabilities. The IAS requires organizations to become compliant with two levels of the WCAG - Level A and Level AA.

Reference Materials:

Recruitment and Selection Process	Policy III-A-10.00
Accessibility Interviewing Checklist	Policy III-A-10.00(a)
Employee Emergency Information Worksheet	III-J-10.00(a)
Employee Emergency Response Plan	III-J-10.00(b)
Individual Accommodation Process	Policy III-J-10.10
Individual Accommodation Plan	Policy III-J-10.10(a)
Early & Safe Return to Work Program	Policy IV-F-10.00

Early & Safe Return to Work Program (non-occupational) Policy IV-H-10.00
Performance Reviews Policy III-E-10.30
TCMH Multi-Year Accessibility Plan