

 Rainy River District Social Services Administration Board	SECTION: Human Resources
	POLICY TITLE: Integrated Accessibility Standards
ORIGINAL DATE: November 21, 2013	POLICY AREA: Accessibility
REVISION DATE: N/A	POLICY NO: HR-38.1
NEXT REVIEW DATE: N/A	APPROVED BY: Board Resolution #68/13

PURPOSE

Under the *Accessibility for Ontarians with Disabilities Act, 2005* all public and private sector organizations must meet the requirements of accessibility standards established by regulation. This policy establishes the Integrated Accessibility Standards in the areas of Employment, Information & Communication and Transportation for the Rainy River District Social Services Administration Board (RRDSSAB), in accordance with *Ontario Regulation 191/11* and with the Ministry of Community and Social Services intent to "streamline, align and phase-in accessibility requirements and allow for progress on accessibility and reduce the regulatory burden for obligated organizations". This regulation came into force July 1, 2011.

SCOPE AND RESPONSIBILITIES

This policy has been drafted in accordance with the Regulation and addresses how the RRDSSAB will achieve accessibility through meeting the Regulation's requirements. It provides the overall strategic direction that the RRDSSAB will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation include:

- a) Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the RRDSSAB's strategy to prevent and remove barriers and meet its requirements under the Regulation;
- b) Incorporation of accessibility criteria and features when procuring or acquiring goods, services, or facilities;
- c) Training; and
- d) Other specific requirements under the Information and Communication, Employment and Transportation Standards.

POLICY STATEMENT AND ORGANIZATIONAL COMMITMENT

The RRDSSAB is committed and guided by the four core principles of Dignity, Independence, Integration and Equal Opportunity and supports the full inclusion of persons as set out in the *Canadian Charter of Rights and Freedoms*, and the *Accessibility for Ontarians with Disabilities Act, 2005*.

The RRDSSAB shall use every effort to ensure that we meet the needs of people with disabilities, in a timely manner, through the implementation of this policy.

This policy applies to every person who interacts with members of the public or other third parties on behalf of the RRDSSAB, whether the person does so as an employee, agent, volunteer or otherwise.

Definitions

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.

Accommodation means special arrangements made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.

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.

IAP means an Individualized Accommodation Plan.

Information includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

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 (URI) and is accessible to the public.

Large Organization with 50+ Employees refers to a private or not-for-profit organization that provides goods, services or facilities to the public, or to other organizations, and has 50 or more employees in Ontario. It does not include the Government of Ontario, Legislative Assembly, or designated public sector organizations (referred to as "large private or not-for-profit organizations" in the guidelines).

Mobility Aid means a device used to facilitate the transport, in a seated posture, of a person with a disability.

Mobility Assistive Device means a cane, walker, wheelchair, scooter or similar aid.

New Internet Website means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

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

- (a) If it is not technically feasible to convert the information or communications;
- (b) The technology to convert the information or communications is not readily available.

Web Content Accessibility Guidelines means the world wide web consortium recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0.

GENERAL PROVISIONS

Multi-Year Accessibility Plan

The RRDSSAB's Multi-Year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. The RRDSSAB will report annually on the progress and implementation of the plan, post the information on our website and will provide it in alternative formats upon request. The plan will be reviewed and updated at least once every five years.

Procuring or Acquiring Goods, Services or Facilities

The RRDSSAB will use accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not practical to do so (in which case, if requested an explanation will be provided).

Training

The RRDSSAB will ensure that training is provided to all employees on the requirements of the accessibility standards referred to in the Regulation and on the *Human Rights Code* as it pertains to persons with disabilities. Training will be provided as soon as practicable. If any changes are made to this policy or the requirements training will be provided. The RRDSSAB shall maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

INFORMATION AND COMMUNICATION STANDARD

The RRDSSAB will create, provide and receive information and communications in ways that are accessible to people with disabilities. If the RRDSSAB determines that it is not technically feasible to convert the information or communications or the technology to convert the information or communication is not readily available, we shall be obligated to provide the person that requires the information with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

Emergency Information

If the RRDSSAB prepares emergency procedures, plans or public safety information and makes the information available to the public, the information will be provided in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

Feedback

The RRDSSAB has a process in place for receiving and responding to feedback and will ensure that those processes are provided in accessible formats and with communication supports upon request. The public will be notified about the availability of accessible formats and communication supports.

Accessible Formats and Communication Supports

The RRDSSAB shall be obligated to provide or arrange for accessible formats and communication supports for persons with disabilities:

- a) Upon request in a timely manner that takes into account the persons' accessibility needs due to a disability;
- b) At a cost that is no more than the regular cost charged to other persons;
- c) Consult with the person making the request and determine suitability of an accessible format or communication support; and
- d) Notify the public about the availability of accessible formats and communication supports.

Website Accessibility

The RRDSSAB shall make their internet website 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. By January 1, 2014, any new web content will conform with WCAG 2.0 Level A. By January 1, 2021 all internet website and web content will conform with WCAG 2.0 Level AA.

Education, Training and Materials

The education, training and materials section applies to educational/training institutions (i.e. Colleges, Universities, Public Libraries) and does not apply to the RRDSSAB.

EMPLOYMENT STANDARD

The Employment Standard builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how to accommodate individuals with disabilities throughout the job application process and the employment relationship. It applies in respect to employees and does not apply to volunteers and other non-paid individuals. The requirements of the Employment Standard shall be met by the RRDSSAB by January 1, 2016 unless otherwise specified.

Recruitment

The RRDSSAB shall notify employees and the public about the availability of accommodations for applicants with disabilities:

- a) During the recruitment process when job applicants are individually selected to participate in an assessment or selection process;
- b) If a selected applicant requests an accommodation, the RRDSSAB shall consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's disability; and
- c) Notify successful applicants of the policies for accommodating employees with disabilities.

Employee Notification

The RRDSSAB shall inform its employees of its policies used to support its 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 a disability:

- a) As required to new employees as soon as practicable after they begin their employment; and
- b) 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 a disability.

Accessible Formats

In addition and where an employee with a disability requests it, the RRDSSAB will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- a) Information that is needed in order to perform the employee's job;
- b) Information that is generally available to employees in the workplace; and
- c) Consult with the employee making the request in determining the suitability of an accessible format or communication support.

Individual Accommodation Plan

The RRDSSAB shall have in place a written process for the development of a documented Individual Accommodation Plan (IAP) for employees with a permanent or temporary disability. The process includes:

- a) The employee's participation in the development of the IAP;
- b) Assessment on an individual basis;
- c) Identification of accommodations to be provided;
- d) Timelines for the provision of accommodations;
- e) The RRDSSAB may request an evaluation by outside medical or other expert, at the employers expense, to assist with determining accommodation and how to achieve accommodation;
- f) Employee may request the participation of a representative from their bargaining agent, where represented, or otherwise a representative from the workplace not from a bargaining agent;
- g) Steps taken to protect the privacy of the employee's personal information;
- h) Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- i) If denied, the reasons for denial are to be provided to the employee;
- j) A format that takes into account the employee's disability needs;

- k) If requested, any information regarding accessible formats and communication supports provided; and
- l) Identification of any other accommodation that is to be provided.

Return to Work

The RRDSSAB will have in place a Return to Work (RTW) process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work. Such processes are documented, outline the steps that the RRDSSAB will take to facilitate the RTW, and includes the development of an Individual Accommodation Plan.

Performance Management, Career Development/Advancement and Redeployment

The RRDSSAB will take into account the accommodation needs and/or individual accommodation plans of employees when:

- a) Using performance management processes;
- b) Providing career development and advancement information; and
- c) Using redeployment procedures.

Workplace Emergency Response Information

The RRDSSAB shall provide individualized workplace emergency response information to employees who have a permanent or temporary disability:

- a) If the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability;
- b) If the employee who receives individual workplace emergency response information requires assistance and with the employee's consent, the RRDSSAB shall provide the workplace emergency information to the person designated to provide assistance to the employee;
- c) As soon as practicable after becoming aware of the need for accommodation due to the employee's disability; and
- d) Reviews individualized workplace emergency response information when an employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when the employer reviews its general emergency response policies.

TRANSPORTATION STANDARD

The Transportation Standard addresses aspects of public transportation and does not apply to the RRDSSAB.

**2014 - 2019 Multi-Year
Accessibility Plan - Integrated Accessibility Standards**

General Deliverables	Proposed Date for Implementation	Date of Completion	Legislated Date for Lg Non-Profit Org. (Jan)
Policies & Procedures	2013	2013	2014
Statement of Org. Commitment	2013	2013	2014
Written Document	2013	2013	2014
Available to the Public	2013	2013	2014
Available in Alternative Format, upon request	2013	2013	2014
Accessibility Plan - Multi Year	2013	2013	2014
Accessibility Plans - Post to web	2013	2013	2014
Accessibility Plans - Review every 5 years	2013	2013	2014
Provide in alternative format	2013	2013	2014
Prepare an Annual Status Report and post	2013		2014
If not practicable provide an explanation	2013	2013	2014
Training - all employees & volunteers, policy developers, those providing goods or services on behalf of org on IAS/Human Rights Code	2015		2015
Information & Communication	Proposed Date for Implementation	Date of Completion	Legislated Date for Lg Non-Profit Org. (Jan)
Emergency Procedure Plans or Public Safety	2012	2012	2012
Feedback - accessible upon request	2015		2015
Accessible formats and communication supports upon request (timely manner, no cost charged to other persons)	2016		2016
Website New Internet & Intranet WCAG 2.0 Level AA (other than closed caption Live prerecorded audio)	2014	2014	2014
All Internet websites and web content WCAG 2.0, Level AA	2021		2021
Employment	Proposed Date for Implementation	Date of Completion	Legislated Date for Lg Non-Profit Org. (Jan)
Workplace Emergency Response	2012	2012	2012
Recruitment - notify employees and public re availability of accommodations	2016		2016
Notify applicant - availability of accommodation upon request for assessments or selection	2016		2016
Arrange for suitable accommodation if required	2016		2016
Notice to Successful Applicant - notify of policies for accommodation	2016		2016
Informing employees of policies re job accommodations	2016		2016
Accessible Formats & Communication Supports	2016		2016
Document Individual Accommodation Plan	2016		2016
Return to Work Process	2016		2016
Employer that uses Performance Management	2016		2016
Employer that provides: Career Development and Advancement	2016		2016
Employer that uses Redeployment	2016		2016