

 Rainy River District Social Services Administration Board	<b>SECTION:</b> Human Resources
	<b>POLICY TITLE:</b> Integrated Accessibility Standards
<b>ORIGINAL DATE:</b> November 21, 2013	<b>POLICY AREA:</b> Accessibility
<b>REVISION DATE:</b> December 17, 2015	<b>POLICY NO:</b> HR-7.0
<b>NEXT REVIEW DATE:</b> December, 2019	<b>APPROVED BY:</b> Board Res. #100/15

## 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”.

## 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.

# Accessibility Standard for Employment

The Rainy River District Social Services Administration Board (RRDSSAB) will provide equal treatment without discrimination and proactively remove barriers for people with disabilities in accordance with the *Accessibility for Ontarians with Disabilities Act* and Regulations.

The Accessibility Standard for Employment comes into effect in 2016 and applies to all paid employees. It builds upon the existing requirements under the *Ontario Human Rights Code* in relation to how to accommodate individuals with disabilities across all stages of the employment cycle.

## **Recruitment and Retention:**

The RRDSSAB adheres to the following guidelines for recruitment and retention:

### Posting Employment Opportunities:

Applicants will be notified about the availability of recruitment-related accommodations for applicants with disabilities to support their full participation in the recruitment process;

### Selected Applicants:

Selected applicants will be notified 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;

### Request for Accommodation:

Consultation with a selected applicant who requests an accommodation for the provision or arrangement of a suitable accommodation that takes into account the applicant's accessibility needs;

### Offers of Employment:

Notifying successful applicants when making offers of employment of our policies for accommodating employees with disabilities.

### **Employee Notification:**

The RRDSSAB will inform all new and existing employees of our 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 a disability:

- As required, to new employees, as soon as practicable after they begin their employment;
- 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 and Communication Supports:**

When 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 information that is needed in order to perform the employee's job;
- For information that is generally available to employees in the workplace (i.e. agendas, meeting minutes, newsletters, forms, etc.); and
- In consultation with the employee making the request, determine the suitability of an accessible format or communication support.

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

### **Individual Accommodation Plan (IAP):**

The RRDSSAB will have in place a written process for the development of a documented individual accommodation plan for employees with a disability.

Individual Accommodation Plans Shall:

- assess and accommodate an employee on an individual basis ensuring the employees involvement in the process;
- each accommodation is assessed on an individual basis;
- allow the RRDSSAB to request an evaluation by an outside medical or other expert, at the RRDSSABs expense, to determine if and how accommodation can be achieved;
- employees are encouraged to request the participation of a representative from their bargaining unit or other representative from the workplace, where the employee is not represented by a bargaining unit, in the development of the accommodation plan;

- include information regarding accessible formats and communications support, if requested;
- be developed and communicated with the employee with a disability in a manner that accommodates the employee's disability;
- individual accommodation plans will remain private and only shared with those necessary to accommodate the plan;
- the individual accommodation plan will be reviewed as determined in the plan;
- consider input, as appropriate, from workplace, medical and/or other experts;
- detail the accommodations to be provided;
- detail timing for the provision of accommodations;
- will trigger the development of a *Workplace Emergency Response Information Plan (WERIP)*, if required; and
- if the accommodation is denied, the appeal process will be explained.

### **Return to Work:**

The RRDSAB will have a return to work process in place for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Such processes will be documented and will outline the steps that the RRDSAB will take to facilitate the return to work and include an individual accommodation plan as necessary.

### **Performance Management, Career Development and Advancement, and Redeployment:**

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

1. Using performance management processes;
2. Providing career development and advancement information;
3. Using redeployment procedures.

### **Workplace Emergency Response Information – Helping Employees with Disabilities Stay Safe**

The RRDSSAB will provide individualized workplace emergency response information to employees who have a disability:

- 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;
- With the employee's consent, to the person designated by the RRDSSAB and the employee to provide assistance to the employee, if required;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- And will review the individualized workplace emergency response information when the 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.

## Accessibility Standard for Information & Communication

The Rainy River District Social Services Administration Board (RRDSSAB) will adhere to the Accessibility Standard for Information and Communications which will make our information accessible for people with disabilities.

The RRDSSAB is committed to creating and providing information and communications (including invoices, order forms, flyers, brochures, etc.) in ways that are accessible to people with disabilities. If there is a determination 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, that person who requires the information will be provided with an explanation as to why the information or communications are not convertible; and a summary of the unconvertible information or communications. With the implementation of the Customer Service Standard in 2012, documents can be made available in accessible formats, such as large print, upon request.

### **Feedback**

The RRDSSAB implemented a feedback process in 2012 in compliance with the Customer Service Standard. The RRDSSAB recognizes that receiving feedback provides a valuable opportunity to learn and improve. The RRDSSAB recognizes the rights of clients/customers to offer a suggestion, make a complaint, or compliment us on the way we provide goods or services. This will also assist us with monitoring and improving our services.

Clients/customers are invited to provide their feedback on the way we provide our goods and services to persons with disabilities in the following ways:

- In person
- By telephone
- In writing
- Electronically by email: [feedback@rrdssab.on.ca](mailto:feedback@rrdssab.on.ca)

The following requirements below will be phased in between 2014 and 2021.

### **Emergency Information**

The RRDSSAB will provide its emergency procedures, plans and public safety information which is made available to the public, in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

When accessible formats and communication supports are requested, the RRDSSAB will consult with the individual making the request to determine the most appropriate method.

The RRDSSAB will provide notification to the public about the availability of accessible formats and communication supports.

### **Accessible Formats and Communication Supports**

The RRDSSAB will provide or arrange for the provision of accessible formats and communication supports for all information for persons with disabilities:

- 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; and
- In consultation with the person making the request to determine the suitability of an accessible format or communication support.

### **Accessible format or communication support:**

These may include, but are not limited to, large print, accessible electronic formats, accessible recorded audio, captioning or audio description and exchanging written notes or reading information aloud.

### **Website Accessibility**

For any major updates of the website or development of new website by the RRDSSAB, the web content will conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 Level A. By **January 1, 2021** all internet websites and web content will conform to WCAG 2.0 Level AA.

### **What are the WCAG guidelines?**

WCAG guidelines explain how to make web content more accessible to people with disabilities. Web content generally refers to the information on a web page or a web application, including, but not limited to text, images, and forms.

## Accessibility Standard for Built Environment

The Ministry of Community and Social Services amended the Integrated Accessibility Standard Regulation (IASR) under the *Accessibility for Ontarians with Disabilities Act (AODA)* to include new standards governing the design of public spaces in the built environment.

Beginning in 2017, large private and not-for-profit organizations with 50 plus employees will have to incorporate accessibility requirements when designing, constructing and maintaining new or redeveloped elements of public spaces including:

- Recreational trails and beach access routes
- Outdoor public-use eating areas (e.g. rest stops or picnic areas)
- Outdoor play spaces (such as playgrounds)
- Exterior paths of travel (such as sidewalks, ramps, stairs, curb ramps)
- Accessible parking (off-street only)
- Service counters and waiting areas

The standard does not require making changes to our existing public spaces. The standard only applies when the RRDSSAB builds new or makes major changes to existing elements of public spaces.

Enhancements to accessibility in buildings will happen at a later date through Ontario's Building Code, which governs new construction and renovations in buildings.



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## Accessibility Standard for Transportation

The RRDSSAB is not a provider of specialized or public transit and does not license taxicabs, therefore, the requirements of the Accessibility Standard for Transportation does not apply.

### **For Information Purposes Only:**

The Accessibility Standard for Transportation will make it easier for people to travel on specialized and public transit and in taxicabs in Ontario, including persons with disabilities, older Ontarians and families traveling with children in strollers.

### **Requirements of the Transportation Standard include:**

- Verbal and visual announcements to notify route, direction, destination and major stops;
- Not charging people with disabilities a higher fare or a fee to store their wheelchairs, canes, walkers, etc.; and
- Repairing accessibility equipment as soon as possible and accommodating people with disabilities until the equipment is repaired.

Requirements for those to whom this standard applies will be phased in between July 2011 and 2017.