

AREA:	AODA
POLICY:	Accessibility
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POLICY:

YWCA Kitchener-Waterloo is committed to inclusion and providing quality services, programs, facilities and policies, practices and procedures that are accessible to all persons we serve and at all stages of employment.

YWCA Kitchener-Waterloo will meet the needs of people with disabilities in a manner that respects their dignity and independence, is free from discrimination, and provides opportunities equitably in relation to the broader public.

PURPOSE:

This policy is intended to fulfill the requirements set out in Ontario Regulation 429/07 and Ontario Regulation 191/11 of the Accessibility for Ontarians with Disabilities Act, 2005, (AODA).

These regulations establish standards to address barriers that persons with disabilities face in the areas of customer service, information and communications, employment, and transportation. The requirements under these standards are not a replacement or substitution for the requirements of the Ontario Human Rights Code.

SCOPE:

This policy applies to all employees, volunteers and students, all persons who participate in developing the association's policies, and all other persons who provide services or facilities on behalf of the association.

ACCESSIBILITY PRINCIPLES:

YWCA Kitchener-Waterloo shall use reasonable efforts to ensure that its services, programs, facilities, policies, practices and procedures are consistent with the principles of independence, dignity, integration and equity, and are free from discrimination.

DEFINITIONS:

Assistive Device is a technical aid, communication device, or medical aid modified or customized, that is used to increase, maintain, or improve the functional abilities of people with disabilities.

Barrier, as defined by the AODA, means anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, and attitudinal barrier, a technological barrier, a policy or practice.

Disability, as defined by the AODA and the Ontario Human Rights Code, is:
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 coordination, 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.

A condition of mental impairment or developmental disability.

A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.

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.

Service Animal, as reflected in Ontario Regulation 429/07, an animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to his or her disability, or if the person provides a letter from a regulated health care professional confirming that the person requires the animal for reasons relating to the disability.

Support Person, as reflected in Ontario Regulation 429/07, a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

POLICY REQUIREMENTS

Accessibility Planning

YWCA Kitchener-Waterloo will establish, implement, maintain and document a multi-year accessibility plan. The plan will outline the ways in which YWCA Kitchener-Waterloo will identify, prevent and remove barriers, and meet the needs of the standards developed under the AODA.

The plan will be posted on the association's website and shall be made available in an accessible format and with communication supports upon request. The plan will be reviewed and, if necessary, be updated at least once every five (5) years.

Meetings and Events

YWCA Kitchener-Waterloo will endeavour to ensure meetings and events held, either publicly or by invitation only, are made accessible to people with disabilities. For this reason, accommodations will be provided upon request that take into account a person's disability.

A standard line such as “Please contact (name) if you require information in an alternate format, require communication supports, or if any other arrangements can make this event accessible to you” will be added to invitations. If possible, the invitation will describe the location of ramps, automatic doors, elevators, etc.

If meetings and/or events are held in locations or premises not owned or operated by YWCA Kitchener-Waterloo, the YWCA will endeavour to ensure the meetings or events are held in locations or on premises that support the YWCAs accessibility policies, especially in regards to the use of service animals, support persons and assistive devices.

Procuring or Acquiring Goods, Services and Facilities

YWCA Kitchener-Waterloo will ensure that accessibility criteria and features are incorporated when it procures or acquires goods, services or facilities, except where it is not feasible to do so. Where it is not feasible to incorporate accessibility criteria and features, the YWCA will provide an explanation upon request.

Accessible Formats and Communication Supports

YWCA Kitchener-Waterloo shall, upon request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities taking into account their accessibility needs.

Documents shall be provided in a timely manner.

If it is determined that the information or communications are unconvertible, or that it is not feasible to convert, the department of origin will provide the person requesting the information or communications with:

- An explanation as to why the information or communications are unconvertible; and
- A summary of the unconvertible information in an accessible format.

Documented materials printed in-house and publications produced on behalf of YWCA Kitchener-Waterloo will contain a note indicating “alternate formats of information and communication supports are available upon request”, and will include relevant contact information.

Converting documents to an alternate format shall be processed in-house whenever possible. When an individual requests a document in an alternative format or communication supports, the department of origin shall be responsible for the cost of communication supports, conversion, materials and distribution, not the individual requesting the information.

Feedback Process

Should an individual wish to provide feedback to YWCA Kitchener-Waterloo on the provision of accessible services, feedback can be provided in the following manner:

- In person at the administrative building located on the main floor at 153 Frederick Street, Kitchener, ON N2H 2M2.
- In person at any YWCA Kitchener-Waterloo program location.
- By telephone at 519-576-8856 ext. 117.
- By email: accessibility@ywcakw.on.ca
- By mail: YWCA Kitchener-Waterloo, 153 Frederick St., Kitchener, ON N2H 2M2.

Upon request, and in consultation with the person making the request, the YWCA will provide or make arrangements to provide accessible formats and communication supports for persons with disabilities in order to assist them in providing feedback. Supports provided will take into account their accessibility needs.

Once feedback has been received the following process will be implemented:

- Feedback relating to accessibility or the manner in which YWCA Kitchener-Waterloo provides its services to people with disabilities will be recorded on an Accessibility Feedback Form.
- Feedback reported at 153 Frederick Street will be forwarded to the relevant staff contact.
- Upon receipt of the feedback, regardless of the format, individuals will receive a response acknowledging receipt of the feedback and the actions that will be taken to address any issues.
- The staff contact will assess current policies, practices and procedures to determine if any changes are required.

Training

All staff, volunteers, students, agents and any other individuals who interact with clients and members of the public on behalf of YWCA Kitchener-Waterloo, and those that develop policies, practices and procedures governing the provision of services to clients and members of the public, will receive accessibility training.

Training will include:

A review of the purposes of the Accessibility for Ontarians with Disabilities Act, 2005, and the requirements of the Customer Service Standard (Ontario Regulation 429/07), the requirements of this policy, and instruction in the following areas:

- How to interact and communicate with people with various types of disabilities.
- How to interact with people with disabilities who use an assistive device, service animal or a support person.
- How to use the equipment or assistive devices available at YWCA Kitchener-Waterloo; and

- What action to take if a person with a particular type of disability is having difficulty accessing services.

A review of the requirements of the accessibility standards referred to in the AODA Integrated Accessibility Standards (Ontario Regulation 191/11) and the Human Rights Code as it pertains to persons with disabilities.

As required by law, YWCA Kitchener-Waterloo will keep records of the training provided, as well as the name of the person, location, and date the training is completed. Training will be provided to all current employees and new employees during orientation. Training will also be provided on an ongoing basis when changes are made to this policy.

CUSTOMER SERVICE STANDARD

Support Persons

YWCA Kitchener-Waterloo will allow persons with disabilities to be accompanied by their support person when accessing services.

YWCA Kitchener-Waterloo reserves the right to request persons with disabilities be accompanied by a support person in the event that it is considered necessary to protect the health and safety of the person with a disability or others. This will only occur after consultation with the person with a disability in order to fully understand their needs, when consideration of health or safety reasons can be based on available evidence, and when there is no other reasonable way to protect the health and safety of the person with a disability or other persons. In the event that the YWCA requests accompaniment any applicable admission fees, fares etc. will be waived for the support person.

Where protection of privacy and confidentiality are concerns during an interaction, the YWCA will confirm with the person with a disability if they would like to continue with their support person present. In the event that a support person is present while private or confidential matters are being discussed, the YWCA may require him or her to sign a confidentiality agreement.

YWCA Kitchener-Waterloo will provide prior notice of any admission fees for support persons who accompany a person with a disability as he or she accesses services where admission is charged. Information on applicable admission fees will be provided at the same location where other fee information is provided.

Service Animals

Persons with disabilities are permitted to be accompanied by their service animal and to keep that animal with them when accessing services provided by YWCA Kitchener-Waterloo, unless otherwise prohibited by law i.e. where food is being prepared.

In the event that a service animal is prohibited from the premises, the reason why the animal is excluded should be explained to the individual and YWCA

Kitchener-Waterloo will ensure that other measures are available to enable the person with a disability to obtain use or benefit from the YWCAs services.

Service animals must be supervised by their owners and kept in control when used to access YWCA Kitchener-Waterloo services.

If an individual on location has a severe allergy to animals which could result in health and safety concerns, YWCA Kitchener-Waterloo shall make reasonable efforts to meet the needs of all individuals.

Assistive Devices

Persons with disabilities may use assistive devices as required in accessing services.

Should a person with a disability be unable to access services through the use of their own personal assistive device, YWCA Kitchener-Waterloo will work with the individual to:

- Assess service delivery and potential service options to meet the needs of the individual; and
- Identify alternative services and how a person with a disability can access the services, either temporarily or on a permanent basis.

Service Disruptions

In the event of a planned service disruption to YWCA Kitchener-Waterloo facilities and services, a notice of the disruption shall be provided in advance. In the event of an unexpected disruption, notice will be provided as soon as possible.

Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities and services that may be available.

Notice may be given by posting the information in a conspicuous place on premises owned or operated by YWCA Kitchener-Waterloo, in reception areas, and/or posted on the YWCAs website, or by such method as reasonable under the circumstances.

INFORMATION AND COMMUNICATION SUPPORTS STANDARD

Communication

YWCA employees and its agents will communicate with people who have disabilities in a manner that takes into account their disability.

YWCA employees and its agents will be given guidelines for communicating with people who have various types of disabilities and be trained to communicate with individuals over the telephone and in person, in clear, plain language, using “people first” terminology.

Website and Web Content

YWCA Kitchener-Waterloo will make its internet website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0, at Level AA, as per the Ontario Regulation 191/11 - AODA Integrated Accessibility Standards.

Emergency Procedures, Plans and Information

Information about incidents that threaten life, property, operations or the environment and related evacuation procedures will be available in accessible format or with communication supports upon request.

Evacuation procedures for clients with disabilities will be developed and documented as required on a case by case basis.

Visitors with disabilities to YWCA Kitchener-Waterloo facilities will be informed of emergency evacuation procedures and of the designated evacuation waiting area.

EMPLOYMENT STANDARD

YWCA Kitchener-Waterloo is committed to fair and accessible employment practices, and to making accommodations for people with disabilities during the recruitment process and throughout employment in accordance with the Ontario Human Rights Code.

Recruitment

YWCA Kitchener-Waterloo shall notify employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process by:

- Including information about the availability of accommodations for applicants with disabilities on job postings.
- Notifying job applicants when they are individually selected to participate in an assessment or the selection process that accommodations are available upon request in relation to the materials or processes to be used.
- Consulting with a selected applicants with disabilities and provide or arrange for the provision of suitable accommodation in a manner that takes into account their accessibility needs; and
- Notifying successful applicants of the policies for accommodating employees with disabilities when making offers of employment.

Employee Supports

YWCA Kitchener-Waterloo 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 abilities and accessibility needs.

This information shall be provided to new employees during orientation and whenever there is a change to the existing polices.

Accessible Formats and Communication Supports for Employees

Upon request YWCA Kitchener-Waterloo shall consult with the employee to provide or arrange for the provision of suitable accessible formats and communication supports for:

- Information that is needed in order to perform the employee's job; and
- Information that is generally available to employees in the workplace.

Workplace Emergency Response Information

YWCA Kitchener-Waterloo will provide individualized workplace emergency response information to employees who have a disability as required. Information will be provided as soon as possible after becoming aware of the need for accommodation.

Individualized workplace emergency response information will be reviewed:

- When the employee moves to a different location in the organization.
- When overall accommodation needs or plans are reviewed; and
- When the YWCA reviews its general emergency response policies.

Individualized workplace emergency response information may only be shared with other parties with the employee's written consent.

Documented Individual Accommodation Plans

YWCA Kitchener-Waterloo shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities. This process shall include:

- The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
- The means by which the employee is assessed on an individual bases.
- The manner in which YWCA Kitchener-Waterloo may request an evaluation by an outside medical or other expert, at the YWCAs expense, to assist with determining if accommodation can be achieved and, if so, how to achieve accommodation.
- The manner in which the employee can request the participation of a representative from their bargaining agent, where represented, or other representative from the workplace where the employee is not represented by a bargaining agent.
- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- If an individual accommodation plan is denied, the manner in which the reasons for denial are to be provided to the employee; and
- The means of providing the accommodation plan in a format that takes into account the employee's accessibility needs.

Return to Work Process

YWCA Kitchener-Waterloo will have in place a documented return to work process for employees who have been absent from work due to occupational and non occupational illnesses and injuries and require disability-related accommodation in order to return to work. The process shall outline the steps YWCA will take to facilitate the return to work and will include documented individual accommodation plans.

Performance Management, Career Development and Advancement, Redeployment

YWCA Kitchener-Waterloo shall take into account the accessibility needs and/or individual accommodation plans of employees when:

- Using performance management processes.
- Providing career development and advancement opportunities; and
- Considering redeployment.

REVIEW PERIOD

This policy shall be reviewed annually and revised as required.

QUESTIONS ABOUT THIS POLICY

If anyone has a question about the YWCAs Accessible Policy or if the purpose of the policy is not understood, they may contact **Human Resources** or call 519-576-8856 ext. 107.

RESOURCES

Ontarians with Disabilities Act, 2001

Accessibility for Ontarians with Disabilities Act, 2005

Ontario Regulation 429/07 – Customer Service Standard

Ontario Regulation 191/11 – Integrated Accessibility Standards

Ontario Human Rights Code R.S.O. 1990

ALSO SEE

AODA Policy: **Communication**

Health and Safety Policy: **Early and Safe Return to Work**