



Policy & Procedure Manual

ACCESSIBILITY STANDARDS – STATEMENT OF ORGANIZATIONAL COMMITMENT AD-I-12

POLICY:

OPTIONS northwest is committed to excellence in providing services to individuals with disabilities and to the continual improvement of accessibility and the ongoing removal of barriers in order to provide greater equity for all.

OPTIONS will make all reasonable efforts to ensure that all policies, procedures and practices are consistent with the principles of independence, dignity, integration and equality of opportunity to all, with particular attention for persons with disabilities. Any policy of OPTIONS that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Ontario has enacted legislation on accessibility; the Accessibility for Ontarians with Disabilities Act, 2005 (AODA, 2005). The Act is a follow up to the Ontarians with Disabilities Act, 2001 (ODA, 2001). The goal is for Ontario to be fully accessible by 2025. OPTIONS northwest is dedicated to meeting all of its obligations under the Accessibility Act. In order to accomplish this, a series of standards will be successively implemented, as appropriate to each Ontario organization and as required by the legislation.

The five standards are as follows:

- **Accessible Customer Service Standards** – establish policies, practices and procedures on providing goods and services to people with disabilities

The next four standards fall under the *Integrated Accessibility Standards*:

- **Accessible Information and Communications Standards** – addresses the removal of barriers in access to information. The standards include information being provided in person, through print, electronic, website or other form of media.
- **Accessible Transportation Standards** – addresses availability of accessible transportation that meets the unique needs of all persons with disabilities, their safety and policies and processes of fairness and equality.
- **Accessible Employment Standards** – addresses paid employment practices relating to employee-employer relationships, which include recruitment, retention, selection policies and practices.



POLICY: AD-I-12
DEPARTMENT: Administration
CATEGORY: General
EFFECTIVE DATE: March 2014
SUPERSEDES VERSION DATED: N/A
Page 2 of 2

- **Accessible Built Environment** – addresses barriers in public spaces and buildings. The standards for public spaces will only apply to new construction and planned redevelopment.

The Director, Human Resources, together with support of the Senior Administration Team, is responsible for coordinating compliance in the agency to meet the requirements of the Standards that apply to OPTIONS northwest.

PURPOSE:

To ensure compliance with the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and its applicable regulations.

To demonstrate the organization's commitment to accessibility and best practice.

PROCEDURE:

1. Accessible Customer Service Standards – see policy AD-I-11.
2. Accessible Information and Communication Standards – see Appendix A
3. Accessible Transportation Standards – not applicable for OPTIONS northwest
4. Accessible Employment Standards – see Appendix B
5. Accessible Built Environment

A Multi-Year Accessibility Plan has been developed to identify timelines for the creation/implementation of the applicable Provincial Standards and is available at the Administrative Office and at www.optionsnorthwest.com

RECOMMENDED BY: Director, Human Resources

APPENDICES: 2

OPERATIONAL ACCOUNTABILITY: Administration, Finance, Human Resources, Personal Support Services Administration, Personal Support Services, Community Resource Team

ORIGINAL POLICY DATE: March 2014

AUTHORIZED BY: Director, Human Resources

SIGNATURE: *Candace Prquinich*

OPTIONS northwest

Procedures

Accessibility Standards for Information and Communication

A: General

OPTIONS northwest is committed to ensuring that people with disabilities have the same opportunity of access to our services as do all others we serve. OPTIONS northwest is committed to meeting the accessibility needs of people with disabilities, in a timely manner, in the provision of services related to information and communications.

B: Definitions

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

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

Accessible formats include but are not limited to options such as large print, screen readers, braille, audio format, captioning.

Conversion-ready is an electronic or digital format that facilitates conversion into an accessible format.

WCAG refers to the World Wide Web Consortium Web Content Accessibility Guidelines

C: Administrative Procedure

1.0 Responsibility

1.1 OPTIONS northwest Senior Directors and Supervisors will ensure that all staff, volunteers and others providing services and programs on behalf of OPTIONS have received training in the requirements of the Integrated Accessibility Standards including the Standards related to Information and Communications. Human Resources shall provide consultation and support regarding training.

1.2 Initial training will commence in 2014.

2.0 Feedback

- 2.1 OPTIONS will ensure that its processes for receiving and responding to feedback are accessible to persons with disabilities.
- 2.2 Upon request, OPTIONS will provide or arrange for the provision of accessible formats and/or communication supports to facilitate feedback.
- 2.3 OPTIONS will notify the public about the availability of accessible formats and communications supports with regard to its feedback processes.
- 2.4 Feedback requirements will be in place by January 1, 2015. NOTE: OPTIONS has two Administrative policies that specifically address Feedback: A. Accessible Standards for Customer Service Policy (original policy date November 2011) and B. Feedback Process (original policy date October 2013)

3.0 Procurement

- 3.1 OPTIONS northwest and all its managerial and office staff will, wherever practicable, incorporate accessibility criteria and features when procuring or acquiring goods and services, designing new systems or planning new initiatives that are related to the provision of information and communication services.
- 3.2 The above approach will be in place by January 1, 2014.

4.0 Provision of Information and Communications in Accessible Formats

- 4.1 Upon request, OPTIONS will provide, or arrange for the provision of, accessible formats and communications supports for persons with disabilities to facilitate their access to the services of OPTIONS northwest.
- 4.2 Accessible formats and communications supports will be provided in a timely manner that takes into account the person's accessibility needs and at a cost no greater than the regular cost charged to other persons.
- 4.3 OPTIONS will determine the suitability of an accessible format or communication support and, in so doing, will consult with the person making the request.
- 4.4 OPTIONS will notify the public, through our website, general publications and other relevant means, about the availability of accessible formats and communications supports.
- 4.5 OPTIONS will ensure that the provisions of 4.0 are in place by January 1, 2016.

5.0 Emergency procedure, plans or public safety information

- 5.1 Upon request, as soon as possible, where OPTIONS northwest prepares emergency Procedures, plan or public safety information and makes the information available to the Public, OPTIONS shall provide the information regarding such emergency procedures, plan or public safety information in an accessible format or with appropriate supports, as soon as practicable, upon request.
- 5.2 The requirements for emergency procedures, plans or public safety information have been in place since January 1, 2012.

5.0 Accessible Websites

- 5.1 OPTIONS will ensure that, as of January 1, 2014, all new websites and web content on these sites will conform with the WCAG 2.0 at Level A.
- 5.2 OPTIONS will ensure that, as of January 1, 2021, all its internet websites and web content will conform with WCAG 2.0 at Level AA.
- 5.3 These requirements do not include Live Captions or Pre-recorded Audio Descriptions.
- 5.4 Except where meeting the above requirements is not practical, these requirements apply to:
 - (a) websites and web content, including web-based applications, that OPTIONS controls directly or controls through a contractual relationship that allows for modifications of the product; and
 - (b) to web content published on a website after January 1, 2012.
- 5.5 Where OPTIONS determines that meeting these requirements is not practicable, such determination will include consideration of:
 - (a) the availability of commercial software or tools or both

Legal Framework

- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
- Integrated Accessibility Standards, Ontario Regulation 191/11
- Ontario Human Rights Code

OPTIONS northwest

Procedures

Accessibility in Employment Procedure

A: General

OPTIONS northwest is committed to ensuring that people with disabilities have the same opportunity of access to employment opportunities and services as do all employees and prospective employees. OPTIONS northwest is committed to meeting the accessibility needs of people with disabilities, in a timely manner, in the provision of services related to employment.

B: Definitions

The procedure with regard to Accessibility in Employment applies only to employees and does not apply to volunteers and other non-paid individuals.

Performance management means activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Career development and advancement includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another that may be higher in pay, provide greater responsibility or be at a higher level, or a combination of these. For both additional responsibilities and employee movement this is usually based on merit or seniority or a combination of these.

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.

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

Communications means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent, or received.

Accessible formats include but are not limited to options such as large print, screen readers, braille, audio format, captioning.

Conversion-ready is an electronic or digital format that facilitates conversion into an accessible format.

WCAG refers to the World Wide Web Consortium Web Content Accessibility Guidelines.

C: Administrative Procedure

1.0 Responsibility

- 1.1 Senior Directors, Supervisors and other staff who have responsibility for hiring and employee selection and/or supervise the work of employees of OPTIONS northwest will ensure that the provisions in this procedure are implemented.
- 1.2 Staff of the Human Resources Department will ensure that the provisions of this procedure are incorporated in their practices.
- 1.3 Unless otherwise stated, the provisions of this procedure will be in place by January 1, 2016.

2.0 Recruitment

- 2.1 OPTIONS will ensure that in its recruitment outreach practices, the public is made aware that the agency will provide accommodation for applicants with disabilities in its recruitment processes. Human Resource policy shall outline such process.
- 2.2 Employees of OPTIONS northwest will be made aware that the agency provides accommodation for applicants with disabilities in its recruitment processes.
- 2.3 When OPTIONS selects job applicants for a job selection process, the agency will make applicants aware that, upon request, they have access to accommodations in relation to materials and processes that will be used for applicant selection and that they will be consulted about the necessary accommodations that take into account their accessibility needs due to disability.
- 2.4 When OPTIONS makes an offer of employment, the agency will notify the successful applicant of its policy of accommodating employees.

3.0 Supports for Employees

- 3.1 OPTIONS will inform employees of the agency's policy of supporting employees with disabilities and procedures that provide for job accommodations.
- 3.2 OPTIONS will make this information available as soon as practicable, during orientation and training, to new employees and will provide updated information, as is available through continued research.

4.0 Accessible Formats and Communication Support

- 4.1 Where an employee with a disability so requests, OPTIONS will consult with the employee to provide or arrange for accessible formats and communication supports in relation to information that is generally available to employees in the workplace and that the employee needs to perform the employee's job.
- 4.2 OPTIONS northwest, in determining the suitability of an accessible format or communication as required by 4.1, will consult with the employee.

5.0 Workplace Emergency Response Information

- 5.1 OPTIONS northwest will ensure that individualized workplace emergency response information is provided to employees who have a disability as soon as is practicable (provided the disability is such that individualized information is necessary) after the agency has been made aware of the need for accommodation due to the disability.
- 5.2 If an employee who receives individualized workplace emergency response information requires assistance, OPTIONS will, with the consent of the employee, provide such information to the person designated to provide assistance to the employee.
- 5.3 OPTIONS will review individualized workplace emergency response information:
 - a) when the employee moves to a different location in the agency;
 - b) when the employee's overall accommodations needs or plans are reviewed, and
 - c) when OPTIONS reviews its general emergency response procedures.
- 5.4 OPTIONS will ensure that the requirements of this section are in place as of January 1, 2012. (formalized December 2013)

6.0 Individual Accommodation Plans

- 6.1 OPTIONS will have in place a written process for the development of documented individual accommodation plans for employees with disabilities.
- 6.2 OPTIONS written process will address:
 - a) How the employee requesting accommodation can participate in the development of the individual accommodation plan.
 - b) The means by which the employee is assessed on an individual basis.
 - c) How OPTIONS can request an evaluation by an outside medical or other expert, at the agency's expense, to assist in determining if accommodation can be achieved and, if so, how it can be achieved.

- d) How the employee can request to have a representative of their bargaining unit, or another workplace representative if the employee is not a member of a bargaining unit, participate in the development of the accommodation plan.
- e) The steps taken to protect the privacy of the employee's personal information.
- f) The frequency with which the individual accommodation plan will be reviewed and updated and how this will be done.
- g) How the reasons for denying an individual accommodation plan will be provided to an employee, if accommodation is denied.
- h) How OPTIONS will ensure that the individual accommodation plan is provided in a format that takes into account the employee's accessibility needs due to disability. This shall be based on the employees restrictions and the Human Rights Code.

6.3 OPTIONS will provide individual accommodation plans that:

- a) Include, if requested any information regarding accessible formats and accommodation supports provided;
- b) Include, if required, individualized workplace emergency response information; and
- c) Identify any other accommodation to be provided. Ie: manager/employee training, repairs/alternations to a workplace made in a reasonable period of time and without undue hardship.

7.0 Return to Work

This return to work process does not replace or override any other return to work process created as a result of any other statutory compliance, e.g. under the Workplace Safety and Insurance Act.

7.1 OPTIONS will develop, put in place and document 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.

7.2 The return to work process will:

- a) Outline the steps the agency will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
- b) Use documented individual accommodation plans (as in 6.0) as part of the process. Ensure that all staff involved in program or course design, delivery and instruction will be provided with accessibility awareness training related to these responsibilities.

8.0 Performance Management

- 8.1 In administering performance appraisal processes in respect of employees with disabilities, OPTIONS will take into account the accessibility needs of employees with disabilities as well as individual accommodation plans, and the necessary accommodations will be provided, in accordance with the Human Rights Code.

9.0 Career Development

- 9.1 Where OPTIONS provides career development and advancement to its employees, the agency will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans and the necessary accommodations will be provided, in accordance with the Human Rights Code.

10.0 Redeployment

- 10.1 Where OPTIONS has in place a redeployment process, the agency will take into account the accessibility needs of employees with disabilities as well as any individual accommodation plans during the redeployment process, and the appropriate plan accommodation plans will be provided, in accordance with the Human Rights Code.

Legal Framework

- Accessibility for Ontarians with Disabilities Act, 2005 (AODA)
- Integrated Accessibility Standards, Ontario Regulation 191/11
- Ontario Human Rights Code
- Workplace Safety and Insurance Act

