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| Title: | Integrated Accessibility Policy | | |
| Type of Policy: | Organizational | | |
| Category: | Human Resources | | |
| Policy Number: | OHR-01 | | |
| Applicable to: | All staff, physicians, volunteers, peers, Board and Committee members and contract personnel | | |
| Sign-Off Required: | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | Sign-Off Collector: | Human Resources |
| Policy Owner(s): | Director of Human Resources | Date of next review: | August 2, 2025 |
| Approved by: | Quality Committee | Date of last approval: | August 2, 2022 |
| | | Original approval date: | 2016 |
| Reference or Resource Documents O. Reg. 191/11: Integrated Accessibility Standards <i>Accessibility for Ontarians with Disabilities Act</i> , 2005, S.O. 2005, c. 11 <i>Human Rights Code</i> , R.S.O. 1990, c. H.19 | | | |

Policy Statement:

Casey House welcomes all people living with and at risk of HIV, their support networks, staff, physicians, volunteers, peers, and invited guests and the broader Casey House community. We are committed to identifying and removing structural, environmental, physical, communication and process barriers that would limit access to Casey House's services, programs, and physical spaces, and to identifying risks and working to prevent future impediments.

Casey House is committed to ensuring that people with disabilities have equal opportunity to access, use, work, volunteer and visit within our services, programs, and physical spaces, and is committed to meeting the accessibility needs of persons with disabilities in a timely manner.

Any person with a disability is welcome to be accompanied by a Support Person, Guide Dog or Service Animal (Policy OHS-09) while accessing services, programs or the physical space in order to maximize the benefits experienced.

Wherever possible, persons are permitted unlimited access to their Mobility Aids and Mobility Assistive Devices. In the rare circumstance which a person's Mobility Aid or Mobility Assistive Devices cannot be used in a particular physical space within Casey House based on medical or safety considerations, Casey House will make reasonable attempts to provide alternative accommodations, as mutually agreed upon between Casey House workers and the individual. Each request for accommodation will be reviewed on a case-by-case basis.

Casey House is committed to the highest standard of customer service for all accessing our services, programs, and physical spaces.

Background / Associated Information:

In 2005 the Ontario Government passed the *Accessibility for Ontarians with Disabilities Act*. The purpose of the *Act* is to progressively ensure that all businesses and service-providers, including nonprofits, work to ensure that those with disabilities are afforded equal access and opportunity to services, programs, and physical spaces. Embedded within the *Act* and amendments is a focus on policy development and training in a manner that speaks to accessibility for all.

Definitions:

Assistive Devices: Devices utilized by persons with disabilities to assist in accessing services, programs, and physical spaces. Assistive devices may include, but are not limited, to reading machines, recording machines, communication devices (sign language, communications board), hearing devices, and grasping tools.

Barrier: Anything that prevents, limits or reduces a person with a disability from accessing services, programs and physical spaces, including structural, environmental, physical, information or communication, attitudinal, technological or policy or practice barriers.

Clients: Any service recipient accessing services, programs, or the physical environment.

Disability: As defined by the Ontario *Human Rights Code* and the *Accessibility for Ontarians with Disabilities Act, 2005*, Disability means:

- i. Any degree of physical disability, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without 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;
- ii. a condition of mental impairment or a developmental disability;
- iii. a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- iv. a mental disorder; or
- v. an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Mobility Aids and Assistive Devices: A Mobility Aid is a device used to facilitate the transport, in a seated posture, of a person with a disability. A Mobility Assistive Device includes a cane, walker, or similar aid.

Guide Dog: A dog trained as a guide for a blind person and having the qualifications prescribed by the regulations.

Service Animal: An animal being used by a person with a disability if the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal, or the person provides documentation from a regulated health professional. Service animals may accompany people with physical, cognitive or seizure related disabilities, among others.

Support Persons: In relation to a person with a disability, another person who accompanies the person to help with communication, mobility, personal care, or medical needs or with access to services, programs, and physical spaces.

Temporary Disruptions: A short-term interruption, either planned or unexpected, to service, access, programs, or parts or all the physical environment.

Workers: Any employee, student, physician, volunteer, peer, or contracted employee who is working for and within Casey House programs, services, or physical environment.

Procedures:

1. Training

Casey House shall ensure that training is provided to all workers on the requirements of the accessibility standards referred to in O. Reg. 191/11: Integrated Accessibility Standards and on the *Human Rights Code* as it pertains to persons with disabilities. Training shall be scheduled and implemented by Human Resources.

- Initial Training shall be assigned by Human Resources within 3 months of when an individual commences performing duties for Casey House
- Initial Training will be comprised of:
 - Completion of an AODA Customer Service Standards Training module
 - Reading of the "Integrated Accessibility Policy" (policy # OHR-01)
 - Reviewing the "Accessible Customer Service Standard" brochure (Appendix A)

Additional training shall be provided within 3 months of any revisions made to this policy and/or related procedures and practices.

2. Information and Communications Standard

Casey House shall create, provide, and receive information and communication to persons with disabilities in an accessible format or with appropriate communication supports, as soon as practicable, upon request. This includes information and communications about Emergency Information, Public Notices, and Event

Information, as further specified below.

If it is determined that it is not technically feasible to convert the information or communication, or the technology to convert the information or communication is not readily available, the person requesting the information shall be provided with:

- an explanation as to why the information or communication is not convertible.
- a summary of the unconvertible information or communication.

3. Emergency Information

Casey House shall prepare emergency procedures, plans or public safety information and make the information available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

4. Feedback Process

The goal of Casey House is to meet and surpass expectations while serving individuals with disabilities. Comments on our services and programs regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding the way Casey House provides services and programs to people with disabilities can be made by:

- Mail address to Accessibility Officer, 119 Isabella St., Toronto, ON, M4Y 1P2
- E-Mail at accessibility@caseyhouse.ca
- Accessibility Feedback form, which can be mailed or left at the main reception at 119 Isabella St.
- Verbally by contacting Supervisor of Volunteers, Accessibility officer at 416-962-4040 extension 7503

Casey House shall provide or arrange for the provision of accessible formats and communication supports, upon request.

All feedback will be directed to the Accessibility Officer. Individuals can expect to hear back within thirty days.

5. Accessible Formats and Communication Supports

Casey House shall provide or arrange for accessible formats and communication supports for persons with disabilities:

- upon request, and 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 another person

- in consultation with the person making the request to determine the suitability of an accessible format or communication support

A brochure entitled "Accessible Customer Service Standard" (Appendix A) overviews Casey House's commitment to accessibility within its services, programs, and physical space. This brochure is also available upon request.

6. Education, Training and Materials

Casey House will make information about the availability of accessible materials publicly available and shall provide the information in an accessible format, where available, or with appropriate communication supports, upon request.

7. Public Events and Education

Casey House will provide the necessary communication assistance to individuals attending Casey House sponsored events and educational programs.

Invitations to events and educational programs will include the following statement:

If you require assistance or accommodation, or if you have any special requirements, please let us know when registering to ensure we can accommodate your needs.

8. Website Accessibility

Casey House shall make the company Internet 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 shall conform to WCAG 2.0 Level A. By January 1, 2021, all website and web content shall conform to WCAG 2.0 Level AA.

9. Employment Standards

The Employment Standards pursuant to O. Reg. 191/11: Integrated Accessibility Standards builds upon the requirements under the *Human Rights Code* in relation to the accommodation of persons with disabilities through the job application process and the employment relationship. The Employment Standards apply in respect to workers and do not apply to volunteers and other non-paid individuals.

a) Recruitment and Selection

Casey House shall notify internal and external job applicants about the availability of accommodations upon request for applicants with disabilities. This may take the form of a notice posted to the Casey House website or a statement on a job posting for which "accommodation for applicants with disabilities is available upon request." In addition, job applicants who have been selected to participate in an assessment or selection process shall be notified that accommodations are available. The related materials or processes required specific to the job applicant's disability shall be discussed in consultation with the applicant.

b) Worker Notification

Casey House shall inform workers of its policies and procedures used to support workers with disabilities, including those on the provision of job accommodation, that consider a worker's accessibility needs due to disability. This information shall be provided to new workers as soon as practical after they commence employment with Casey House. Once the applicable support is identified, Corporate Health (SMH) will make recommendations on how best for Casey House to accommodate the worker on all return-to-work processes and accommodations.

Casey House shall provide updated information to workers whenever there is a change to existing policies on the provision of job accommodations that take into account a worker's accessibility needs due to disability.

c) Accessible Formats and Communication Supports for Workers

In addition, and where a worker with a disability request, Casey House shall consult with the worker to provide or arrange for the provision of accessible formats and communication supports for:

- information that is needed to perform the job tasks; and
- information that is generally available to workers in the workplace.

Casey House will consult with the worker making the request in determining the suitability of an accessible format or communication support.

d) Individual Accommodation Plan and Return to Work Process

Casey House shall develop, maintain, and document an individual accommodation plan for workers with disabilities to meet requirements under the Employment Standards that reflects their role, responsibilities and scope of practice. Information regarding accessible formats and communication supports shall be covered in individual accommodation plans.

In accordance with the provisions of O. Reg. 191/11: Integrated Accessibility Standards, Casey House will ensure that the process for the development of documented individual accommodation plans includes the following elements:

- information regarding the manner in which the worker requesting accommodation can participate in the development of the plan
- information regarding the means by which the worker is assessed on an individual basis
- information regarding the manner in which Casey House can request an evaluation by an outside medical or other expert, at Casey House's expense, to assist Casey House in determining if and how accommodation can be achieved

- information regarding the manner in which the worker can request the participation of a representative from their bargaining agent, where the worker is represented by a bargaining agent, or other representative from the workplace, where the worker is not represented by a bargaining agent, in the development of the accommodation plan
- steps to protect the privacy of the worker's personal information
- information regarding the frequency with which individual accommodation plans will be reviewed and updated and the manner in which this will be done
- the reasons for a denial if an individual accommodation plan is denied
- information regarding the means of providing the individual accommodation plan in a format that takes into account the worker's accessibility needs
- the following will be included if individual accommodation plans are established:
 - o any information regarding accessible formats and communication supports that have been provided for or arranged, to provide the worker with:
 - information that is needed in order to perform the worker's job
 - information that is generally available to workers in the workplace
 - Identification of any other accommodation that is to be provided to the worker

Casey House will ensure that the return-to-work process as set out in its existing policies outlines:

- the steps Casey House will take to facilitate the worker's return to work after a disability-related absence
 - the development of a written individualized return to work plan for such workers
 - the use of individual accommodation plans, as discussed above, in the return-to-work process
- e) Performance Management, Career Development, Advancement, and Redeployment

Casey House shall examine the accessibility needs of workers with disabilities, as well as individual accommodation plans, when handling performance management, providing career development and advancement to workers, and if redeploying workers to other locations or workgroups.

f) Workplace Emergency Response

Casey House shall provide individualized workplace emergency response information to workers who have a disability as soon as practicable, if the disability is such that the individualized information is necessary, and Casey House is aware of the need for accommodation due to the worker's disability.

Where the worker with a disability requires assistance, Casey House in consultation with the worker and with their consent, shall provide an assigned support person(s) to assist during emergency situations that require evacuation of the premises. The individualized workplace emergency plan or process shall be shared with the support person(s), only with full agreement by the worker always ensuring their privacy. Casey House shall review the individual workplace emergency information when or if the worker moves to a different location or workgroup, when the worker's overall accommodation needs, or plans are reviewed and when Casey House reviews its general response policies. This will be done in consultation with the reporting supervisor, human resources specialist and the worker.

In addition, a general emergency evacuation process shall be in place for any facility that may have visitors with disabilities that require further assistance. This process shall be communicated to all workers.

10. Temporary Disruptions

Casey House will provide individuals with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people with disabilities. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice will be placed at all public entrances and reception areas of Casey House's facilities and posted on the web site.

11. Public Spaces Standards (Accessibility Standards for the Built Environment)

Casey House will comply with the Design of Public Spaces Standards (Accessibility Standards for The Built Environment) as per O. Reg. 191/11: Integrated Accessibility Standards where technically feasible when undertaking new construction and redevelopment of public spaces in the following areas where applicable:

- a) recreational trails/walkways/access routes
- b) outdoor public use eating areas
- c) outdoor play spaces
- d) exterior paths of travel
- e) accessible parking

- f) obtaining services; and
- g) maintenance of accessible elements.

12. Policy Review

Casey House is responsible for reviewing this policy every three (3) years and implementing recommended amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.

Management personnel will ensure that they and their workers under their supervision are familiar with this policy.

13. Monitoring and Contraventions

Management personnel will monitor current practices to ensure compliance. Failure to comply with this policy may result in disciplinary action, up to and including dismissal.

Please note

This policy is subject to amendment and/or revocation at Casey House's sole discretion, without prior notice to workers.

14. Other

If an individual has any inquiries about this policy or accommodations that may be provided, they may contact the Accessibility Officer, at 416-962-4040, extension 7503.

Accessible formats of this document are available upon request.

Appendix

A – Accessible Customer Service Standard

B – AODA Customer Service Standards - Customer Feedback Form

References:

Please see page 1.