

OCASI Personnel Policies & Procedures

OCASI'S Accessibility Policy and Programs

Effective date: July 2012

1. PURPOSE AND POLICY STATEMENT

The goal of the *Accessibility for Ontarians with Disabilities Act, 2005* (the “Act”) is to create a more accessible Ontario, by identifying, and to the extent possible, preventing, and eliminating barriers experienced by persons with a disability.

A standard for customer service (“the Standard”) has been established under the Act to ensure goods and services are, where at all possible, equally accessible to every member of the public.

We at OCASI are committed to developing policies, practices and procedures that provide accessible quality services to its customers. OCASI is dedicated to ensuring all programs and services are accessible to customers in accordance with Ontario Regulation 429.07 Accessibility Standards for Customer Services.

The objective of this policy (the “Policy”) is to ensure we meet the requirements of the Standard and promote its underlying core principles, described below.

2. CORE PRINCIPLES OF THE POLICY

We endeavor to ensure that the Policy and related practices and procedures are consistent with the following four (4) core principles:

- i. Dignity - Persons with a disability must be treated as valued customers as deserving of service as any other customer.
- ii. Equality of Opportunity - Persons with a disability should be given an opportunity equal to that given to others to obtain, use and benefit from our goods and services.
- iii. Integration - Wherever possible, persons with a disability should benefit from our goods and services in the same place and in the same or similar manner as any other customer. In circumstances where integration does not serve the needs of the person with a disability, goods and services will, to the extent possible, be provided in another way that takes into account the person's individual needs.
- iv. Independence – Goods and services must be provided in a way that respects the independence of persons with a disability. To this end, we will always be willing to assist a person with a disability but will not do so without the express permission of the person.

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3. APPLICATION

The Policy applies to all persons who, on behalf of OCASI deal with members of the public or other third parties. This includes our employees, Board members, volunteers, and contractors.

DEFINITIONS

- i. **Accessibility Report** – The report required to be filed pursuant to section 14 of the Act.
- ii. **Assistive Device** - Any device used to assist a person in performing a particular task or tasks or to aid that person in activities of daily living.
- iii. **Barrier**, as defined by the Accessibility for Ontarians with Disabilities Act, 2005, 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, information or communications barrier, an attitudinal barrier, a technological barrier, a policy, procedure or a practice.
- iv. **Disability**, as defined by the Accessibility for Ontarians with Disabilities Act, 2005 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 co-ordination, blindness or visual impediment, deafness or hearing 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 a 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.
- v. **Service Animal** - An animal is a service animal for a person with a disability,
 - (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or
 - (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.
- vi. **Support Person** – A person who accompanies a person with a disability to assist with communication, mobility, personal care or medical needs or with access to goods or services.

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- vii. *“We”, “Our” and “Staff”* means OCASI and its employees, volunteers, directors, agents and contractors.

4. IMPLEMENTATION

OCASI has created an Accessibility Committee responsible for:

- i. Developing and implementing policies, practices and procedures to ensure the accessible provision of goods and services to persons with a disability.
- ii. Developing and implementing an accessibility training program as required under the Act.
- iii. Developing a feedback procedure as required under the Act.
- iv. Filing Accessibility Reports as required under section 14 of the Act.

5. PROVIDING GOODS AND SERVICES TO PEOPLE WITH DISABILITIES

I. Communication

OCASI will communicate with people with disabilities in ways that take into account their disability.

We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

We are committed to providing fully accessible telephone service to our customers. We will offer to communicate with customers by TTY if telephone communication is not suitable to their communication needs.

II. Assistive Devices

OCASI is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our goods and services, unless otherwise prohibited due to health and safety or privacy issues ((see list of legislation under references and related documents section of this document which provides a non-exhaustive list of such legislation). We will ensure that our staff are trained and familiar with various assistive devices that may be used by persons with disabilities while accessing our goods or services.

Persons with a disability are permitted, where possible, to use their own Assistive Device when on our premises for the purposes of obtaining, using or benefiting from our goods and services.

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If there is a physical, technological or other type of barrier that prevents the use of an Assistive Device on our premises we will first endeavour to remove that barrier. If we are not able to remove the barrier we will ask the person how he/she can be accommodated and what alternative methods of service would be more accessible to him/her. We will make best efforts to provide an alternative means of assistance to the person with a disability.

Staff will receive training on various Assistive Devices that may be used by persons with a disability while accessing our goods and services. OCASI would be pro-active with information about new assistive devices and provide the necessary training when necessary.

III. Service Animals

Persons with disabilities are permitted to be accompanied by their service animal and keep that animal with them when accessing goods or services provided by OCASI, unless the animal is otherwise excluded by law.

In the event that a service animal is otherwise prohibited by law from the premises, OCASI shall ensure that other measures are available to enable the person with a disability to obtain, use or benefit from OCASI's goods or services.

It is the responsibility of the person with a disability to ensure that his or her service animal is kept in control at all times.

Staff will receive training on how to interact with persons with a disability accompanied by a Service Animal.

IV. Support Persons

Persons with disabilities are permitted to be accompanied by their support person when accessing goods or services provided by OCASI.

Where fees for goods and services are charged OCASI shall ensure that notice is given in advance about the amount, if any, that would be charged to a support person.

OCASI may deem it necessary to require a support person for a person with a disability in order to protect the health and safety of that person or others on the premises. This will only occur after consultation with the person with a disability and when it is the only means to allow the person with a disability to access OCASI's goods or services.

Staff will receive training on how to interact with persons with a disability who are accompanied by a Support Person.

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V. Accessibility at Our Premises and at OCASI organized events.

We offer the following facilities and services at each OCASI location to which the Policy applies to enable persons with a disability to obtain, use or benefit from our goods and services.

Staff will receive training on how to use facilities or services made available on our premises to assist persons with a disability to obtain, use or benefit from our goods and services.

OCASI staff members inviting individuals to OCASI events held outside the OCASI office will include a section in the invitation and/or registration form inviting people who require disability-related accommodations to specify them ahead of time. These messages should clearly convey the message that participants with disabilities are welcome and as such, accommodations will be provided for them. OCASI staff will make every reasonable effort to provide accommodations required ahead of time.

When selecting an external venue for an event, the organizer will use the checklist below to insure the venue meets appropriate accessibility criteria

- a. The venue has an accessible subway stop nearby or, or is within close proximity to public transit.
- b. There are ramps/or elevators to access the different levels of the building where the event will be held. OCASI Staff will ensure that there is a reasonable turning radius for wheelchairs etc.
- c. The venue has accessible parking spaces that are close to an elevator
- d. The venue has accessible washrooms (staff will physically verify that the doorways that lead into the washroom and accessible stalls are wide enough for a wheelchair or a scooter to go through and that stalls have a grab bar).
- e. The event organizer will check with the administration of the venue before the event to insure they have an accessibility policy in place regarding the use of service animals.
- f. When organizing an OCASI training event or another type of meeting, the event organizers will allot some budget for sign language interpreters for participants with hearing impairment.
- g. OCASI staff will provide event materials to sign language interpreters ahead of time in order for them to prepare for interpretation during the session.
- h. OCASI staff will provide large print materials for people with visual impairments when these are requested before the event.
- i. If a person with a visual impairment requests to have course materials before attending a session (for example slides) OCASI staff will send the materials electronically with enough time for the person to review the materials before the session.
- j. Braille would be provided where possible.

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VI. Notice of Temporary Disruptions

OCASI will notify customers if there is a planned or unexpected disruption of a facility. The notice will be posted at the entrance of the applicable premises and on the home page of the OCASI website.

The notice will include the following information:

- i. That a facility or service is unavailable.
- ii. The anticipated duration of the disruption.
- iii. The reason for the disruption.
- iv. Alternative facilities or services, if available.

6. TRAINING AND RECORDS

OCASI will provide training, and ongoing training as required under the Act, to all persons to whom this Policy applies as well as to those persons charged with developing this Policy and related procedures and practices. A training webinar would be developed on persons with disabilities.

A. Content of Training for Staff and Board of Directors

Training will include:

- i.* A review of the purpose of the Act and requirements of the Standard.
- ii.* A review of the Policy.
- iii.* How to interact and communicate with persons with various types of disabilities.
- iv.* How to interact with persons with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person.
- v.* How to use equipment or devices made available on our premises to assist persons with a disability to obtain, use or benefit from our goods and services.
- vi.* What to do if a person with a disability is having difficulty accessing our premises and/or services.
- vii.* How to use other common assisted devices.

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B. Timing of Training

Training will be provided to all persons to whom this Policy applies as soon as practicable after he or she is assigned the applicable duties. Current employees would be trained within three (3) months of this policy being approved. There will on-going sessions once every six (6) months.

C. Documenting Training

Records of the training provided, including the training protocol, the dates on which the training is provided and the number of individuals to whom the training is provided shall be maintained in accordance the requirements of the Act.

7. FEEDBACK PROCEDURE

OCASI will maintain a feedback process to enable members of the public to comment on the provision of goods and services to persons with disabilities. Feedback from the public is welcomed as it may identify areas that require change and encourage continuous service improvements.

Feedback shall be received in any form (i.e. in person, by telephone, in writing, fax or in electronic format including email) and all such feedback will be logged for reporting purposes.

All feedback will be kept in strict confidence and used to improve customer service. An answer to feedback is not mandatory, however depending on the situation, it may be appropriate to respond to the customer. Should an answer be deemed appropriate and should the customer have chosen to supply his or her contact information, the customer will be provided with a response.

Information about the feedback process will be readily available to the public and notice of the process will be provided on OCASI's website and/or in other appropriate locations.

A. Receiving Feedback

OCASI welcomes and appreciates feedback regarding this Policy and its implementation. Feedback can be provided in the following ways:

- i. In person at 110 Eglinton Ave West-Suite 200, Toronto, ON M4R 1A3
- ii. By telephone at 416 322 4950 – Ext 231
- iii. In writing to Manager – Finance & Administration at the address listed above
- iv. Electronically to generalmail@ocasi.org

B. Responding to Feedback

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OCASI has a feedback protocol to enable it to receive and respond to comments in a timely manner, including complaints. OCASI feedback protocol is available upon request. Feedback and complaint should not be considered the same.

8. DOCUMENTATION TO BE MADE AVAILABLE

This Policy, and related practices and protocols, shall be made available to any member of the public upon request.

Notification of same shall be posted on OCASI website and at a conspicuous place at each premise to which this Policy applies.

9. FORMAT OF DOCUMENTS

OCASI will provide documents, or the information contained in documents, required to be provided under the Standard, to a person with a disability in a format that takes the person's disability into account.

10. WEBSITE ACCESSIBILITY

OCASI strives to ensure that our online products are accessible to people with disabilities and usable with standard assistive technologies.

We are working to ensure our websites meet at least the Level A standard of the Web Content Accessibility Guidelines 2.0 by 2014. Some examples include:

- a) There are text alternatives for video and audio resources.
- b) Our websites can be navigated by keyboard (mouse not required).
- c) Our websites can be read out logically by a screen-reader.

We are currently in the process of assessing our websites for conformance to the aforementioned standards. Once conformance is reached, we will place a statement on websites to indicate this to users, along with a list of the key standards and a invitation for feedback. User feedback on the accessibility of the websites will be dealt with promptly.

11. Responsibilities

The OCASI Management Team is responsible for:

- Ensuring compliance with the Ontario Regulation 429/07, Accessibility Standards for Customer Service
- Including accessibility in annual planning processes
- Budgeting for accessibility requirements

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- Support staff attendance at required training
- Communicating, coordinating and/or providing service to a person with a disability regarding the use, or who may use a, service animal, support person or assistive device
- Providing notification of service disruptions and support person admission fees
- Providing all documentation in appropriate formats upon request by a person with a disability
- Coordinating and providing Accessible Customer Service training to all staff in order to comply with Ontario Regulation 429/07, Accessibility Standards for Customer Service
Coordinating and maintaining training records
- Establishing and maintaining an ongoing training program to ensure all staff are trained in providing Accessible Customer Service as part of the corporate orientation process