

INTEGRATED ACCESSIBILITY STANDARDS POLICY

Approved by Board December 18, 2013

1.0 PREAMBLE

The *Ontarians with Disabilities Act (ODA)* became law in 2001. The purpose of the ODA was to establish a legislative framework to “improve opportunities for people with disabilities and to provide for their involvement in the identification, removal and prevention of barriers leading to their full participation in the life of the province”. In 2005, *The Accessibility for Ontarians with Disabilities Act (AODA)* came into effect. The AODA legislation improves upon the ODA by developing, implementing and enforcing standards that will regulate both government and public sector organizations, with the goal of creating an Ontario that is accessible for all.

Under the ODA, HopeGreyBruce is required to develop multi-year plans which set out timelines to meet specific criteria for making policies, practices, services, and buildings more accessible to people with disabilities.

A number of accessibility standards now exist under the AODA legislation:

- Accessibility Standards for Customer Service are set out in Regulation 427/07.
- The Integrated Accessibility Standards (which contains the General Accessibility Requirements and Standards for Information and Communications, Employment and Transportation), as set out in Regulation 191/11.

The following policies and procedures were specifically developed to comply with the Integrated Accessibility Standards.

Related Documents:

- *Ontarians with Disabilities Act, 2001*
- *Accessibility for Ontarians with Disabilities Act, 2005*
- *Ontario Regulation 191/11 – Integrated Accessibility Standards*
- *Ontario Regulation 429-07 – Accessibility Standards for Customer Service*
- HopeGreyBruce policy regarding Accessible Service for Individuals with Disabilities
- *Ontario Human Rights Code*

2.0 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.
- **Assistive Device:** any device that is designed, made or adapted to assist a person to perform a particular task. Examples of assistive devices include walkers, magnifiers, wheelchairs or TTY.
- **Barrier:** anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This may include:
 - physical barrier
 - architectural barrier
 - information or communications barrier
 - attitudinal barrier
 - technological barrier
 - a policy or practice (organizational barrier)

Architectural and Physical Barriers are features of buildings or spaces that cause problems for people with disabilities. Examples are:

- Hallways and doorways that are too narrow for a person using a wheelchair, electric scooter or walker
- Counters that are too high for a person of short stature
- Poor lighting for people with low vision
- Doorknobs that are difficult for people with arthritis to grasp
- Parking spaces that are too narrow for a driver who uses a wheelchair
- Telephones that are not equipped with telecommunications devices for people who are deaf, deafened, or hard of hearing

Information or Communications Barriers happen when a person cannot easily understand information. Examples are:

- Print is too small to read
- Websites that cannot be accessed by people who are not able to use a mouse
- Signs that are not clear or easily understood
- A person who talks loudly when addressing a person with a hearing impairment

Attitudinal Barriers are those that discriminate against persons with disabilities.

Examples are:

- Thinking that persons with disabilities are inferior
- Assuming that a person who has a speech impairment cannot understand you
- A receptionist who ignores a customer in a wheelchair

Technological Barriers occur when a technology cannot be modified to support various assistive devices. An example is a website that does not support screen-reading software.

Organizational Barriers are an organization's policies, practices or procedures that discriminate against persons with disabilities. Examples are:

- A hiring process that is not open to persons with disabilities
- A practice of announcing important messages over an intercom that persons with hearing impairments cannot hear clearly

- **Client, Consumer, Customer:** A person who inquires about, seeks access to, or accesses the services of HopeGreyBruce Mental Health and Addictions Services or visits our premises.
- **Dignity:** Treating a person with a disability as valued and deserving of the same type of service our organization provides to any other individual.
- **Disability:** The definition of "disability" used in this policy is the one contained in the Human Rights Code:
 - *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, 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 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.*

According to the Ontario Human Rights Commission, “*Disability covers a broad range and degree of conditions, some visible and others not. A disability may have been present from birth, caused by an accident, or developed over time. It includes physical, mental, and learning disabilities, mental disorders, hearing or vision disabilities, epilepsy, drug and alcohol dependencies, environmental sensitivities, as well as other conditions.*”

The commission gives additional information about mental disabilities:

“Protection for persons with mental disabilities deserves special attention. These persons have the same rights as persons with any other kind of disability. They may, however, have trouble expressing themselves or even identifying that they have a disability.”

The Guide: Accessibility Standards for Customer Service, Ontario Regulation 429/07 states that: “The definition includes disabilities of different severity, visible as well as non-visible disabilities, and disabilities the effects of which may come and go.”

- **Equal Opportunity:** People with disabilities having the same chances, options, and benefits as others and their special needs taken into account to ensure they can fully participate in our programs and services.
- **Independence:** Freedom from control or influence of others, freedom to make choices or do things in a preferred way at a chosen pace.
- **Integration:** Allowing people who have disabilities to fully benefit from the same programs and services in the same place and in the same or similar ways as other individuals. In the context of this policy, integration of services does not mean coordinating services among service providers and jurisdictions.
- **Services:** For the purpose of this policy, services are defined as assistance, interventions, activities or other work undertaken for the benefit of clients. They include providing information, education, consultation, advice, formal and informal support, treatment and other forms of assistance.
- **Workplace:** For the purposes of this policy, the workplace is any location in which an employee carries out his/her employment duties on behalf of HopeGreyBruce Mental Health and Addictions Services. This includes but is not limited to program/team offices, clients’ homes, the organization’s residential properties, the Green House, vehicles used in the delivery of services and any non-owned facilities used by the organization to deliver services, provide training or host events/activities.

3.0 PURPOSE OF POLICY

The purpose of this policy is to:

1. Ensure compliance with Ontario Regulation 191/11 – Integrated Accessibility Standards (IASR) of the AODA;
2. Confirm the responsibility of the organization and its employees to use all reasonable efforts to make our services accessible to all individuals with disabilities; and
3. Set out the policies and procedures that HopeGreyBruce has adopted in order to meet its requirements.

This policy is not intended to replace or supersede our organization’s policies and procedures for Accessible Customer Service that are required by *Ontario Regulation 429/07*.

This policy is publicly available at the following locations:

- HopeGreyBruce Mental Health and Addictions Services website
- Central Administration Office

- Program/Team Offices

The organization strives to provide this policy in formats that take into consideration the disabilities of individuals who request the policy.

The IASR policy is reviewed and amended as required, when additional accessibility-related regulations are enacted by the Government of Ontario and when changes are made to the legislative framework governing accessibility.

4.0 SCOPE OF POLICY

The following policy applies to:

- all people who access our services and those who seek access;
- unless otherwise specified, all employees of HopeGreyBruce, Board members, contractors, consultants and others who provide service to clients for or on behalf of the organization, including those individuals who are involved in developing our policies and procedures regarding the Accessibility Standards; and
- people who accompany individuals with disabilities who use our services.

5.0 STATEMENT OF COMMITMENT

HopeGreyBruce Mental Health and Addictions Services is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

HopeGreyBruce Mental Health and Addictions Services is committed to:

- Meeting the accessibility needs of persons with disabilities with respect to the organization's programs, services and facilities and
- Meeting the objectives and requirements of *Ontario Regulation 191/11, Integrated Accessibility Standards (IASR)* under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

6.0 POLICY

6.1 General Policy

HopeGreyBruce Mental Health and Addictions Services is committed to treating all people in a way that allows them to maintain their dignity and independence. Our planning and delivery of services, our day-to-day operations, and our policies and procedures reflect our commitment to meeting the accessibility needs of persons with disabilities with respect to our programs, services and facilities

6.2 Accessibility Plans

HopeGreyBruce Mental Health and Addictions Services establishes, implements, maintains, and documents a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR.

The multi-year accessibility plan is:

- posted on the HopeGreyBruce Mental Health and Addictions website and provided in an accessible format, upon request, as soon as is practicable; and,
- reviewed and updated by the organization at least once every five years.

6.3 Status Reports

Subject to any requirements under the regulations, HopeGreyBruce Mental Health and Addictions Services prepares and posts a status report on the progress of measures taken to implement the accessibility plan as required by the AODA. The report is posted on the organization website and is provided in an accessible format, upon request, as soon as is practicable.

6.4 Training

HopeGreyBruce ensures that the following persons have been trained on the requirements in the IASR and the *Ontario Human rights Code*, as it pertains to persons with disabilities:

- employees
- persons who participate in developing the organization's policies
- volunteers
- individuals completing a practicum, co-op or placement as part of an academic program
- all other persons who provide goods, services or facilities to clients of HopeGreyBruce on behalf of the organization.

Training is appropriate to the duties of the participants.

6.5 Policy Review

The Integrated Accessibility Standards Policy is reviewed and/or amended when additional accessibility regulations are enacted by the Government of Ontario or as required.

7.0 ACCESSIBLE INFORMATION AND COMMUNICATIONS POLICY

7.1 Definitions

- **Communications** means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.
- **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.
- **Information** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.
- **Unconvertible** means it is not technically feasible to convert the information or communications, or that 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".

7.2 Policy

HopeGreyBruce is committed to meeting the legislated standards for accessible information and communication, which include the requirement to provide accessible formats, communication supports, websites, and web content.

7.2.1 Feedback

HopeGreyBruce Mental Health and Addictions Services ensures that the processes for receiving and responding to feedback about its information and communications are accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and subject to the limits of available resources.

7.2.2 Accessible Formats and Communication Supports

HopeGreyBruce Mental Health and Addictions Services notifies the public about the availability of accessible formats and communication supports.

Upon request, and subject to the limits of available resources, the organization provides or arranges for the provision of accessible formats and communication supports for persons with disabilities. It does so:

- in a timely manner that takes into account the person's accessibility needs;

- in consultation with the person making the request to determine the suitability of an accessible format or communication support; and,
- at a cost that is no more than the regular cost charged to other persons.

Exceptions:

The IASR does not apply to the following:

- product or product labels;
- unconvertible information or communications; and,
- information that the organization does not control directly or indirectly through a contractual relationship.

If HopeGreyBruce determines that information or communications are unconvertible, the organization 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 or communications.

7.2.3 Accessible Websites and Web Content

HopeGreyBruce Mental Health and Addictions Services works toward making its website and web content conform to the *World Wide Web Consortium's Web Content Accessibility Guidelines*, initially at level A and increasing to level AA in accordance with the timeframes set out in Section 14 (4) of the IASR, as follows:

1. By January 1, 2014, new internet websites and web content on those sites will conform with WCAG2.0 Level A.
2. By January 1, 2021, all internet websites and web content will conform with WCAG 2.0 Level AA, other than,
 - a. Success criteria 1.2.4 Captions (Live); and
 - b. Success criteria 1.2.5 Audio Descriptions (pre-recorded).

8.0 ACCESSIBLE EMPLOYMENT POLICY

8.1 Definitions

- **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 in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.
- **Performance management** means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.
- **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 by the organization.

8.2 Scope of Policy

The requirements set out in the Accessible Employment Standards section of the HopeGreyBruce Mental Health and Addictions Integrated Accessibility Policy apply only to employees of the organization. They do not apply to volunteers or other unpaid individuals.

8.3 Policy

8.3.1 General Policy

HopeGreyBruce Mental Health and Addictions Services is committed to providing a welcoming and inclusive workplace. To this end, its recruitment, hiring, and human resources policies and procedures take into account the accessibility requirements of its employees and of those who are seeking employment.

8.3.2 Recruitment

HopeGreyBruce Mental Health and Addictions Services

- notifies its employees and the public about the availability of accommodation for applicants with disabilities in recruitment processes;
- notifies job applicants when they are selected to participate in an assessment or selection process that accommodations are available in relation to the materials or processes to be used;
- consults with the applicant to provide or arrange for the provision of suitable accommodation that takes into account the applicant's accessibility needs.

8.3.3 Notice to Successful Applicants

When making offers of employment, HopeGreyBruce Mental Health and Addictions Services notifies the successful applicant of the organization's policies for accommodating employees with disabilities.

8.3.4 Informing Employees of Supports

HopeGreyBruce Mental Health and Addictions Services informs employees of the organization's policies used to support its employees with disabilities including those on the provision of job accommodation that take into account an employee's accessibility needs.

This information is provided to new employees as soon as practicable after they begin their employment with the organization.

Updated information is provided to employees whenever there is a change to existing policies on the provision of job accommodations.

8.3.5 Accessible Formats and Communication Supports for Employees

When requested by an employee, the organization consults with the employee to provide or arrange for the provision of accessible information formats and communication supports needed to perform the employee's job and information generally available to employees in the workplace.

8.3.6 Workplace Emergency Response Information

HopeGreyBruce Mental Health and Addictions Services provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the organization has been made aware of the need for accommodation due to the employee's disability.

Individualized workplace emergency response information will be reviewed when an employee moves to a different location in the organization, when the employee's overall accommodation needs or plans are reviewed and when the organization reviews its general emergency response policies.

8.3.7 Documented Individual Accommodation Plans

HopeGreyBruce Mental Health and Addictions Services develops and implements a policy and procedure for the development of documented accommodation plans for individual employees with disabilities. The policy and procedure includes the elements identified in section 28 (2) of the IASR.

8.3.8 Return to Work Process

HopeGreyBruce Mental Health and Addictions Services develops, documents, and has in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation to return to work.

8.3.9 Performance Management, Career Development and Advancement, and Redeployment

HopeGreyBruce Mental Health and Addictions Services takes into account the accessibility needs of employees with disabilities and individual accommodation plans in performance management processes, when providing career development and advancement opportunities and when considering redeployment of employees with disabilities.