



Multi-Year Accessibility Plan

2014

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Guelph Independent Living Statement of Commitment

Guelph Independent Living (GIL) is committed to being responsive to the needs of all its clients, employees and volunteers, regardless of disabilities. To ensure equal access and participation for persons with disabilities GIL will:

- Ensure its policies, practices and procedures provide for dignity, independence, integration and equal opportunity
- Identify, prevent, and remove barriers for persons with disabilities in accessing and using GIL goods, services, programs and facilities
- Accommodate the accessibility needs of persons with disabilities to ensure that they can obtain, use, or benefit from GIL goods, services, programs and facilities and they can do so in a timely manner
- Develop and train GIL employees on providing accessible goods, services, programs and facilities

This commitment provides guidance on how GIL will ensure that its goods, services, programs and facilities are provided in an inclusive manner that takes into account the needs of persons with disabilities.

Introduction to the AODA

1. Purpose of the Act

The purpose of the Accessibility for Ontarians with Disabilities Act (AODA), 2005, is to ensure equal access to services, employment, transportation, information and buildings for all Ontarians, regardless of any disability.

The AODA is Ontario's roadmap to become barrier-free by 2025.

2. Achieving Compliance

The AODA sets out five standards for accessibility that organizations have to achieve. Every organization must review its policies, procedures, practices, attitudes and premises to determine what barriers exist, remove those barriers or make provisions that ensure equal access in some other way.

3. Everyday Customer Service Delivery

Organizations must document their accessibility policies and create the required forms. They must make those documents available to anyone requesting them. They must report annually on their level of compliance to the Ontario Ministry of Community and Social Services.

Implementation for the five standards is done one-step at a time, beginning with the Customer Service standards. Eventually, by January 1, 2025, all 5 standards will be implemented. Each individual standard will be reviewed at least every five years after it has become law. New standards may be added.

4. The Five Standards for Accessibility

- Customer Service
- Information and Communications
- Employment
- Transportation (does not apply to GIL)
- Built Environment

5. Definition of Disability

Disabilities can be visible or non-visible, have different levels of severity, or have effects which may come and go. In the AODA, Section 2, a disability is defined as:

- Any degree of physical disability, infirmity, malformation or disfigurement caused by bodily injury, birth defect or illness, including diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness, 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 of 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.

6. AODA and ODA (Ontario with Disabilities Act, 2001)

The AODA will eventually replace the Ontarians with Disabilities Act (ODA), 2001. However, the ODA will remain in effect for the foreseeable future and while the five Standards of the AODA are being phased in.

7. Other Laws and Enforcement

If there is a conflict with another law, example the Human Rights Code or Building Codes, Section 38 of the AODA states that the law that provides the higher level of accessibility is the law that must be followed.

Provisions are in place for enforcement of the Customer Service standard – through reporting requirements, inspections, compliance orders and administrative penalties.

8. Definitions

Accessibility – A general term used to describe the degree of ease that something (e.g. device, service and environment) can be used and enjoyed by persons with a disability. The term implies conscious planning, design and/or effort to ensure it is barrier-free to persons with a disability and, by extension, highly usable and practical for the general population as well.

Accessible Formats – Formats that are an alternative to standard print that may include, but are not limited to large print, recorded audio and electronic formats such as HTML and MS Word, Braille and other formats usable by persons with disabilities.

As Soon as Practicable – Means as soon as possible given all of the circumstances after a person with a disability asks for the information in an accessible format or with communication supports, or to the organization's ability given all of the circumstances to modify their websites and web content.

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.

Clients, Customers, Members of the Public - once an applicant has been accepted into a program, GIL uses the term 'client' from that point forward. However, for the purposes of AODA, the definition of client may also include applicants to programs, customers and members of the public

Communications - The term communications as used in the Information and Communications Standard refers to the interaction between two or more people or entities when information is provided, sent or received.

Communication Supports – Supports that individuals with disabilities may need to access information. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate.

Disability - See 5 Definition of Disability

IASR – Integrated Accessibility Standards Regulation

Information – Refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images

New internet website – means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh (such as a new look and feel to the website, a change in how users navigate around it or a major update and change to the content of the website)

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

Redeployment – 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.

Web Content Accessibility Guidelines (WSAG) - World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”

Customer Service Standard

In keeping with its mission of being “*committed to our clients living with dignity by delivering quality programs, housing and supportive services*”, GIL is committed to providing goods and services that are accessible to all.

Since January 1, 2010, GIL has been compliant with the Accessibility Standards for Customer Service (Ont. Reg 429/7). In 2011-2012, GIL filed its customer service accessibility report and has made some notable accomplishments in accessibility including:

- Customer Service Accessibility Policy published on website on 2010.
- Training on Customer Service continues to be provided to all new staff, volunteers and other third parties who provide services and all people who are involved in the development and approvals of customer service policies, practices and procedures. GIL will continue to ensure that new staff, and staff who commence new duties that involve interaction with the public or other third parties, will participate in training as part of their orientation, if they have not already done so.
- A record of to whom and when training is delivered is documented.
- We welcome feedback and provide contact information on our website to facilitate feedback processes.
- Clients and staff have several options available to provide feedback on the accessibility of the agency’s customer services, including telephone, TTY, fax and email. All feedback is forwarded to the Communications and Privacy Officer to ensure feedback collected is reviewed and analyzed to identify potential gaps in customer services and to ensure appropriate actions are taken.
- GIL will continue to provide clients with notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities. This notice includes information about the reason for the disruption, how long the disruption is expected to last and a description of any alternative facilities or services available (if any).

To review the GIL Accessibility Standards for Customer Service Policy please see Human Resources Policy Manual E-1 or the copy posted on the GIL website.

General Requirements

1. Accessibility Policy

GIL recognizes the diverse needs of all its:

- Clients and strives to provide services and programs that are accessible to all. As a provider of services, GIL is committed to ensuring that its goods and services are provided in an accessible manner
- Employees and strives to provide a workplace that is accessible to all of them. As an Employer, GIL is committed to ensuring its workplace is accessible.

The GIL Accessibility Policy is to function as an umbrella policy for the requirements of the standards developed under the *Accessibility for Ontarians with Disabilities Act, 2005*.

To review the GIL AODA Accessibility Policy please see Human Resources Policy Manual E-2 or the copy posted on the GIL website.

2. Multi-Year Accessibility Plan and Compliance Timeline

This 2012-2021 Plan and Timeline for compliance with the Accessibility for Ontarians with Disabilities Act (Large Organizations with 50+ employees) outlines the requirements and policies/procedures that are already in place within GIL and the actions that GIL 's upcoming obligation pursuant to the AODA and identifies how GIL will meet those obligations. GIL is committed to fulfilling its requirement under the AODA and making its premises and services accessible to all Ontarians.

	Compliance Deadline	✓	Additional Resources	Lead
GENERAL REQUIREMENTS				
- Accessibility Policy	January 2014	✓	HR Policy E-2	SLT
- Multi-year accessibility plan	January 2014	✓		SLT
- Review and update of plan	Ongoing			SLT
- Training	January 2015		Pending	HR
CUSTOMER SERVICE STANDARD				
- All requirements under the Customer Service Standard	January 2012	✓	HR Policy E-1	HR
INFORMATION AND COMMUNICATION STANDARD				
- Feedback	January 2015		Add to Newsletter	Communications
- Accessible formats and communication supports	January 2016			Communications
- Accessible websites and web content WCAG 2.0 Level A	January 2014	✓	Confirmed by Metroland Digital	Communications
- Accessible websites and web content WCAG 2.0 Level AA	January 2021			Communications
EMPLOYMENT STANDARD				

	Compliance Deadline	✓	Additional Resources	Lead
- Workplace emergency information	January 2012	✓	Workplace Emergency Response Information Plan	HR/Admin
- Recruitment, Assessment and Selection Process	January 2016			HR/Admin
- Employee accommodation	January 2016			HR/JHSC
- Employees returning to work	January 2016			HR/JHSC
- Performance management, career development and redeployment	January 2016			HR

3. Review and Update of Plan

GIL is committed to reviewing and updating the Accessibility Plan at least once every five years. This review will assist GIL to:

- Confirm that the organization is on track for meeting our requirements
- Highlight accomplishments that have been made
- Make any adjustments needed in order to meet the timelines under the Integrated Accessibility Standards Regulation (IASR).

4. Training

GIL is committed to implementing a process to ensure that all employees, volunteers and people who provide goods, services and facilities on GIL's behalf, and persons participating in the development and approval of GIL policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities and are provide with such training as soon as practicable.

Planned Action to Ensure Compliance by January 1, 2015

In accordance with IASR, GIL will:

- Ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to:
 - All employees and volunteers, including paid and unpaid positions
 - Anyone who participates in develop GIL's policies, including managers, senior leaders, board of directors, business owners and independent operating regulated professionals
- Anyone who provides goods, services and facilities on behalf of GIL, which might include outsourced services (such as payroll facilities management and contact centres)
- Ensure that the training is provided to persons referenced above as soon as practicable. This will normally take place at soon as possible during the three-month probationary period, in accordance with the GIL annual training schedule
- Ensure training is updated as changes occur and all individuals listed above are advised of the updates
- Ensure that training is provided on any changes to the prescribed policies on an ongoing basis

- Training may be delivered in a variety of formats, including handouts, PowerPoint presentations, at orientation sessions, at staff meetings, or as on-line training modules
- Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided

Information and Communication Standard

1. Feedback (Section 11) and 2. Accessible Formats and Communications Supports (Section 12)

GIL is committed to following best practices when developing, implementing and maintaining information and communications strategies and products to ensure that information and communications are available and accessible to persons with disabilities. GIL will incorporate new accessibility requirements under the information and communication standard to ensure that its information and communications systems and platforms are accessible and are provided in accessible formats that meet the needs of persons with disabilities. This includes websites, intranet sites, communication materials, telephone communications and face-to-face interactions. The goal is to help persons with disabilities access sources of information that many of us rely on every day.

Planned Action to Ensure Compliance by January 2015 & January 1, 2016

In accordance with the IASR, GIL will:

- Ensure that existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports, upon request and in a timely manner and at no additional cost.
- More broadly, as a general principle where accessible formats and communication supports for person with disabilities are requested:
 - Upon request, provide or arrange for the provision of such accessible formats and communication supports
 - Consult with the person making the request to determine the suitability of the accessible format or communication support
 - Provide or arrange for the provision of accessible formats and communication supports in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost no more than the regular cost charged to other persons
 - Notify the public about the availability of accessible formats and communication supports

2. Accessible Websites and Web Content (Section 14)

GIL is committed to making its information and communications practices accessible to people with disabilities.

Action Taken

To meet this goal GIL conducted an assessment and a thorough redesign of the GIL website in 2014 to ensure that the new internet website and web content complied with the WCAG 2.0 Level A. This redesign includes requirements that include, but are not limited to, the following guidelines and improvements:

- providing captions and text alternatives for images and multimedia
- using strong contrast colours between text and background
- making text resizing available
- using structured content and making it keyboard accessible
- avoiding time limits when asking users to provide a response or information
- avoiding blinking images
- avoiding the use of colour indicators
- helping users find and navigate content by making links specific
- helping users avoid and correct mistakes by making error messages specific
- making tables and charts accessible to assistive technology,

In addition:

- Relevant GIL staff have received training on web
- AODA checklist/guidelines have been produced for web site
- Website accessibility audit is performed
- AODA ‘Document/Accessibility Training’ to be held February 9, 2015 to train remainder of administration office

Planned Action to Ensure Compliance by January 2021

In accordance with the IASR, GIL will ensure that by January 1, 2021 the website and web content conforms to WSAG 2.0 Level AA (with the exception of criteria 1.2.4 Captions [live] and criteria 1.2.5 Audio Descriptions [pre-recorded]).

Employment Standard

Where GIL is aware that an employee has a disability and there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

1. Workplace Emergency Response Information (Section 27)

Action Taken

GIL is currently compliant with the 2012 requirements including:

- Educating employees on the availability of individualized workplace emergency response information for employees who have a disability
- Developing Workplace Emergency Response Information Plans to employees who have disclosed a disability and who are being accommodated according to their disability
- Where required, providing assistance to an employee with a disability, with the employee's prior consent, to assist them to evacuate the workplace in case of an emergency or disaster. These plans for providing assistance have been set out in individualized emergency plans of the employees.
- Communicating these individualized emergency plans to the employee's respective Coordinators, Managers and appropriate Joint Health and Safety Committee members, on an "as needed" basis
- On an ongoing and regular basis, review and assess general workplace emergency response procedures and individualized emergency plans they remain effective and up to date, at a minimum under the following circumstances:
 - When the employee moves to a different physical location within GIL
 - When the employee's overall accommodations needs or plans are reviewed, and
 - When the employer reviews its general emergency response policies

2. Recruitment, Assessment, Selection and Notification Process (Sections 23 & 24)

GIL is committed to fair, inclusive and accessible employment practices that attract and retain talented employees with disabilities. This includes providing accessibility across all stages of the employment cycle.

Planned Action to Ensure Compliance by January 1, 2016)

In accordance with the IASR, GIL will do the following:

- Notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process
- Review and modify existing recruitment policies, procedures, and processes, as necessary
- Indicate that accommodation is available for applicants with disabilities, on the GIL website and on job postings
- Work with suppliers to ensure external Web pages are compliant with the Information and Communication Standards under the IASR's requirements
- Notify job applicants – when they are individually selected to participate in an assessment or selection process – that accommodations are available upon request in relation to the materials or processes to be used in the assessment/selection process. This will include:
 - Inclusion of availability of accommodation notices as part of the script in the scheduling of an interview and/or assessment

- Provision of suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability, if a selected applicant requests an accommodation
- When making offers of employment, GIL will notify the successful applicant of its policies for accommodating employees with disabilities. When accommodation is required, GIL will develop a workplace accommodation plan in accordance with GIL's Workplace Accommodation and Return to Work Policy.

3. Informing Employees of Supports (Section 25) and Accessible Formats and Communication Supports for Employees (Section 26)

In accordance with the IASR, GIL will inform all employees of policies that support employees with disabilities including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

Planned Action to Ensure Compliance by January 1, 2016

In accordance with the IASR, GIL will do the following:

- Inform current employees and new hires of GIL's policies supporting employees with disabilities including, but not limited to, policies on the provision of job accommodations that take into account an employee's needs due to disability
- Provide information under this section as soon as practicable after the new employee begins employment, specifically in the orientation process
- Keep employees up to date on changes to existing policies on job accommodations with respect to disability
- Where an employee with a disability so requests it, GIL will provide or arrange for provision of suitable accessible formats and communications supports for:
 - Information that is needed in order to perform the employee's job
 - Information that is generally available to employees in the workplace
- In meeting the obligations to provide the information that is set out in the paragraph above, GIL will consult with the requesting employee in determining the suitability of an accessible format or communication support

4. Documented Individual Accommodation Plans/Return to Work Process (Section 28 & 29)

GIL will incorporate accessibility requirements under the IASR to ensure that barriers in accommodation and return to work processes are eliminated and internal policies surrounding accommodation and return to work are followed, where applicable.

Planned Action to Ensure Compliance by January 1, 2016

GIL's current Stay at Work/Return to Work Policy D-4.2 outlines the process for reintegrating employees into the workplace as soon as possible following a workplace/non-workplace related injury or illness.

GIL will review and assess this policy and other existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with both work and non-work related injuries or illnesses, but also disabilities.

GIL will ensure that the process for the development of documented individual accommodation plans includes the following elements, in accordance with the provisions of the IASR:

- 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 basis
- The manner in which GIL can request an evaluation by an outside medical or other expert, at GIL's expense, to determine if and how accommodation can be achieved
- The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining unit, or their representative from the workplace, where the employee is not represented by a bargaining unit, in the development of the accommodation plan
- Protecting 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 the denial will be provided to the employee
- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs
- If individual accommodation plans are established, ensure that they include:
 - If requested, include any information regarding accessible formats and communications supports that have been provided or arranged, in order to provide the employee with:
 - Information that is needed in order to perform the employee's job
 - Information that is generally available to employees in the workplace
 - If required, individualized Workplace Emergency Response Information Plans
 - Identify any other accommodation to be provided to the employee
- GIL will ensure:
 - That existing return to work policies and procedures include 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
 - The return to work process is documented
 - The return to work steps GIL will take to facilitate the return to work of employees who were absent because their disability required them to be away from work are outlined
 - The use of individual documented accommodation plans, as described above

5. Performance Management (Section 30), Career Development and Advancement (Section 31), and Redeployment (Section 32)

GIL will take into account the accessibility needs of employees with disabilities, as well as individual accommodations plans:

- When using its performance management process in respect of employees with disabilities management
- When providing career development and advancement opportunities to its employees with disabilities

- When redeploying employees with disabilities

Planned Action to Ensure Compliance by January 1, 2016)

In accordance with the IASR, GIL will:

- During performance management processes review, assess and, as necessary, modify existing policies, procedures and training ensure compliance with the IASR including:
 - Review an employee's individual accommodation and determine whether it needs adjusting to improve his or her performance on the job
 - Have documents available in accessible formats
 - Provide informal and formal coaching and feedback in a manner that takes into account an employee's disability
- When providing career development and advancement opportunities, take into account what accommodations employees with disabilities may need to succeed elsewhere in the organizations or take on new responsibilities in their current position
- Consider the accessibility needs of employees with disabilities when moving them to other positions, so that employees can continue to have their accommodation needs met

Resources consulted in the design of this Plan:

- [Accessibility for Ontarians with Disabilities Act, 2005](#)
- [City of Guelph Corporate Accessibility Policy](#)
- [Customer Service Standard, Ontario Regulation 429/07](#)
- [eHealth Ontario AODA Multi-Year Accessibility Plan 2013-2017](#)
- [GIL Customer Service Policy](#)
- [Integrated Accessibility Standard](#)
- [Ontario Human Rights Commission](#)
- [Public Health Ontario Accessibility Multi - Year Plan](#)
- [Traverse Independence Accessibility Standards Manual](#)