

<p><b>Grand River Employment and Training</b></p> 	<p><b>Accessibility for Ontarians with Disabilities Act (AODA) Policy</b></p>	<p>Creation Date: XX/XX/XXXX</p> <p>Amendment Date: August, 2017</p> <p>Reviewed By: Management Team</p> <p>Approved By: Director</p> <p>Verification: _____</p>
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## Grand River Employment and Training Inc.

### Accessibility Policy

#### 1.0 Purpose

This policy establishes Grand River Employment and Training Inc.'s (GRETI's) accessibility standards for client service, information and communication, employment, transportation and design of public spaces, in accordance with Integrated Accessibility Standards (Ontario Regulation 191/11). The *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its Regulations.

GRETI is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA. GRETI respects and supports the Ontario *Human Rights Code*.

#### 2.0 Definitions

**“Accessible Formats”** means any form of large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities in order to conduct business with GRETI.

**“Assistive Device”** means a personal device used to assist persons with disabilities in carrying out activities and accessing GRETI's services. Personal assistive devices include walkers, white canes used by people who are blind or who have low vision, note-taking devices, personal oxygen tanks to assist breathing, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes) and computer technologies.

**“Bus”** refers to a motor vehicle designed to carry 10 or more passengers and used for transporting people

**“Career development and advancement”** includes adding responsibilities to an employee's current position and/or the movement of an employee from one job to another in the organization that may be higher in pay provide greater responsibility at a higher level in the organization or any combination of these.

**“Client”** means the subset of the general public to whom GRETI provides services in the ordinary course of business.

**“Communication Supports”** means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications in order to conduct business with GRETI.

**“Conversion Ready”** means an electronic or digital format that facilitates conversion into an acceptable format.

**“Disability”** means:

- a) Any degree of physical 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 coordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog, other animal or on a wheelchair or other remedial appliance or device;
- b) A condition of mental impairment or a developmental disability;
- c) A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) A mental disorder;
- e) An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

**“Extensive renovation”** means where existing interior walls or ceilings or floor assemblies or roof assemblies are substantially removed in an existing building and new interior walls, ceilings, floor assemblies or roof assemblies are installed in the building.

**“Guide dog”** means a guide dog as defined in section 1 of the Blind Persons’ Rights Act.

**“Kiosk”** means an interactive electronic terminal, including a point-of-sale device, for public use that allows users to access one (1) or more services or products.

**“Internet website”** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

**“New Internet website”** means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

**“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.

**“Service Animal”** means any animal used by a person with a disability for reasons related to the disability where it is apparent that the animal is used by the person for reasons relating to his or her disability.

**“Support Person”** means a person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to GRETI’s services.

**“Web Content Accessibility Guidelines”** means the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0”.

**“Webpage”** means a non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent

### **3.0 Accessible Client Service Policy**

#### **3.1 Communication**

GRETI will communicate with persons with disabilities in ways that take into account their disability and enable them to communicate effectively for purposes of using, receiving and requesting GRETI’s goods, services and facilities. GRETI will train its employees and representatives who communicate with Clients on how to interact and communicate with persons with various types of disabilities.

#### **3.2 Use of Service Animals**

If a person with a disability is accompanied by a guide dog or other service animal, GRETI will ensure that the person is permitted to enter any GRETI facility with the animal and to keep the animal with him/her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, GRETI will provide other measures to enable the person with the disability to obtain, use and benefit from our goods, services and facilities. If it is not readily apparent that the animal is a service animal, GRETI employees may ask for confirmation of the animal’s status. It is not the practice of GRETI to unduly limit the access of animals to its premises. It is the responsibility of the person with a disability to ensure that his/her service animal is under his/her control at all times.

#### **3.3 Use of Support Persons**

If a person with a disability is accompanied by a support person, GRETI will ensure that both persons are permitted to enter its premises, and that the person with a disability is not prevented from having access to the support person. GRETI may require the person with a disability to be accompanied by a support person when on GRETI’s premises in the event that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises. This will only occur after consulting with the person with a disability and, after considering the evidence, if GRETI has determined that a support person is required and that there is no other reasonable way to protect the health and safety of the person with a disability or the health and safety of others on the premises.

#### **3.4 Use of Assistive Devices**

GRETI will ensure that its employees and representatives are familiar with the use of assistive devices available on GRETI’s or its representatives’ premises, as appropriate to their duties, and inform its Clients of the assistive devices that are available. A person with a disability may use his or her own personal assistive devices for accessing or using GRETI’s goods, services and facilities. Where the person’s assistive device poses a health and safety risk to themselves or others on GRETI’s premises, GRETI may request that the person use an alternative means for accessing and

using goods, services and facilities, including any available assistive devices GRETI has onsite for these purposes. It is the responsibility of the person with a disability to ensure that his/her assistive device is operated in a safe and controlled manner at all times. In the event the person using an assistive device cannot access GRETI's goods, services or facilities, GRETI will accommodate the person by using any other temporary measures available and deemed appropriate, such as, but not limited to, providing access to other methods, devices or a Support Person.

### **3.5 Notice of Temporary Disruptions**

GRETI will provide notice of temporary disruptions in facilities and services GRETI provides to persons with disabilities which support them in obtaining, using and benefiting from GRETI's goods, services and facilities. The notice of disruption will include information about the reason for the disruption, its anticipated duration, and a description of any alternative facilities and services that are available. Notice will be made conspicuous and may be displayed at the location of the disruption, on the website, in a mailing or in a pamphlet. In the event of an unplanned disruption, advance notice may not be possible.

## **4.0 Information and Communication Policy**

### **4.1 Multi-Year Accessibility Plan and Annual Status Reports**

GRETI will establish, implement, maintain and document a Multi-Year Accessibility Plan outlining its strategy to improve the accessibility of its goods, services and facilities and meet the compliance requirements of the AODA. Annual status reports will be prepared that will report on the progress of the steps taken to implement GRETI's accessibility plan. Both the Multi-Year Accessibility Plan and the annual status report will be made available in alternate formats upon request, and will be posted on our website.

### **4.2 Website Accessibility**

Any new internet websites or web-based applications (including when making significant modifications to these) that GRETI controls directly or through a contractual relationship that allows for modification of a product will conform to Web Content Accessibility Guidelines Level A. Where possible, GRETI will publish new web content on its existing Internet website(s), which conforms to Web Content Accessibility Guidelines Level A. GRETI will continue to work towards increasing the accessibility of its existing web content, website(s) and web-based applications.

### **4.3 Alternate Formats Available Upon Request**

All GRETI organizational information is made available to Clients, employees and the public in an accessible format or via accessible communication support upon request. GRETI will consult with the person making the request to determine the suitability of an accessible format or communication support provided. The timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable. GRETI will notify its Clients and the public about the availability of accessible formats and communication supports through its website(s), through printed materials and through posted notice within GRETI's offices.

### **4.4 Self-Serve Kiosks**

GRETI will take steps to make self-serve kiosks accessible, on a go forward-basis, to people with disabilities so they can be used independently and securely.

## 4.5 Self-Serve Kiosks Accessibility Features

When determining what accessibility features can be included in the design or purchase of a kiosk, GRETI may incorporate technical features, structural features, and the access path to the kiosk.

**Technical features** – includes the colour contrast on the display screen and the options to increase font size, as well as allowing for extra time to complete tasks. Other technical features include voice activating equipment and visual and nonvisual modes of operation, etc.

**Structural features** – includes the height and stability of the kiosk, headset jacks with volume control, and specialized keypads or keyboards, etc.

**Access path** – includes reach ranges for people using mobility aids, the proximity of the kiosk to other objects, etc.

## 4.6 Education and Training Resources and Materials

Upon request, GRETI will provide or arrange for the provision of the following information in an accessible format to students (past, current and potential) with disabilities:

- Training resources and materials\*;
- Student records; and
- Program information (e.g. course requirements, descriptions and availability).

Accessible formats will take into account the needs of the individual to whom the material is being provided. *\*Training resources and materials may be provided in an accessible or conversion-ready format.*

## 4.7 Training and Educators

In addition to the general training requirements, GRETI will provide all educators with, accessibility awareness training. GRETI will maintain a record of all training provided. Training will include the dates on which training was provided and the number of people that were trained.

## 4.8 Producers of Educational and/or Training Materials

GRETI will create and make available accessible or conversion ready materials, including textbooks and print-based supplementary learning resources, upon request.

## 4.9 Accessible Emergency Information

GRETI will provide emergency response information and assistance to its Clients and the public in an accessible manner upon request.

## 5.0 Employment Policy

### 5.1 Individualized Accommodation of Employees with Disabilities

GRETI will accommodate the needs of job applicants who require accommodation during the recruitment process and will review the needs of employees with disabilities who request job-related

accommodations. Employees requiring accommodation will be consulted when determining suitable accommodation, including the provision of accessible formats or communication supports.

GRETI has developed a written Accommodation Policy, which outlines the process for the development of documented individual accommodation plans (IAP) for employees with disabilities. GRETI has also developed a written Return-to-Work Policy for employees who are returning to work after illness or disability and require accommodation to facilitate a safe return to work. Employees can access the most current version of these policies on the shared drive or request a copy from their supervisor.

## **5.2 Individualized Workplace Emergency Response Information**

GRETI prepares for emergency situations and develops protocols for the protection of, and assistance to, everyone on GRETI's premises during an emergency. Workplace emergency procedures, plans and safety information will be shared with new employees when they start work and this information is available to employees in an accessible format or via accessible communication support at any time upon request. Timeframes for this information will be dependent upon the format requested and will be provided as soon as is practicable.

## **5.3 Individualized Emergency Response Plans for Employees**

All GRETI employees with disabilities who may require assistance in an emergency situation are encouraged to identify their accessibility needs to their immediate supervisor or member of the health and safety committee so that individualized emergency accommodation plans can be created. This information will be maintained confidentially.

## **5.4 Applicant Accommodation in Recruitment and Selection**

GRETI will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. Upon request, GRETI will make accommodation available in its recruitment process to applicants with disabilities, short of undue hardship. Applicants will also be accommodated, short of undue hardship, when they are individually selected to participate in an assessment or selection process.

## **5.5 Notice of Accommodation Availability to Employees**

In addition to this Accessibility Policy, GRETI has an Accommodation Policy for accommodating employees with a disability. Employees can access the most current version of the Accommodation Policy on the shared drive or request a copy from their supervisor. Employees will receive updated information whenever there is a change to existing policies. GRETI will notify successful applicants of its policies for accommodating employees with disabilities when making offers of employment, and as part of the orientation process, will provide information about policies used to support employees as applicable after they begin employment.

## **5.6 Accessible Formats and Communication Supports for Employees**

Upon request, GRETI will provide accessible formats and communication supports to employees with disabilities to permit access to information they need in order to perform their job, as well as information that is generally provided to employees in the workplace. Accessible formats and communication supports will be provided short of undue hardship. The employee will be consulted to determine the suitability of accommodation to be provided or arranged by GRETI and these

requirements will be documented in individual accommodation plans (IAPs) in accordance with GRETI's Accommodation Policy.

## **5.7 Return-to-Work Accommodation Plans**

GRETI has a process for the development of return-to-work individual accommodation plans for employees returning to work who have been absent due to an illness or disability and who now require accommodation.

## **5.8 Accommodation in Performance Management, Career Development and Advancement and Re-deployment**

GRETI will ensure its performance evaluation process; career development and advancement opportunities; and redeployment processes are accessible to employees with disabilities. When an employee with a disability requests accessible formats or communication supports, GRETI will consult with the employee and provide or arrange for the provision of suitable accommodation, short of undue hardship.

## **6.0 Training**

GRETI will provide training to all employees, volunteers, and other persons it engages to deliver goods, services and facilities on its behalf, as well as to any person who is involved in developing GRETI policies, as required by the AODA. The amount and format of training will be in relation to the person's level of interaction with GRETI's Clients. Training will include the following:

- i. a review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- ii. the requirements of the Accessibility Standards;
- iii. instructions on GRETI's policies, practices and guidelines pertaining to the provision of service to persons with disabilities;
- iv. how to interact and communicate with persons with various types of disabilities, including the provision of alternate formats;
- v. review of different types of alternate formats and accessible communication supports;
- vi. what to do if a Client requests information in an alternate format;
- vii. how to interact and communicate with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person;
- viii. what to do if a person with a disability is having difficulty accessing GRETI's services; and
- ix. information about, and instruction on, the equipment or devices available on GRETI or agent offices as appropriate to assist in providing services to persons with disabilities, such as the Bell Canada Relay Service.

Training will be provided to each person according to his or her duties as soon as is practicable. Ongoing training will be provided in connection with changes to GRETI's policies, practices and procedures governing the provision of goods, services and facilities to persons with disabilities. A record of the dates on which training is provided and the individuals to whom it is provided will be maintained. GRETI will review its training policies and programs as new requirements under the AODA become effective.

## **7.0 Feedback Process**

GRETI has a feedback process through which persons with disabilities are encouraged to comment on GRETI's goods, services and facilities, and their experience in being accommodated with accessible formats and communication supports when requested in order to provide such feedback.

Feedback may be delivered to GRETI in person, by telephone, mail, e-mail, facsimile or such other means available to the person. Accessible formats and communication supports will be made available upon request to persons wishing to provide feedback.

Privacy will be respected throughout the feedback process. All feedback will be reviewed for possible improvement and accessibility to GRETI's goods, services and facilities. Feedback will be directed to the most appropriate person within GRETI for dealing with it and any complaints will be addressed as soon as possible.

Clients can expect an acknowledgment of their feedback to be issued within two business days. The acknowledgment will indicate when the matter will be addressed and when the Client will be notified, further in the matter. Communication with the Client will take into account his/her accessibility needs and will be provided in an alternate format or with communication support upon request. GRETI will follow up with any required action within the timeframe noted in the acknowledgement. The feedback process will be posted on our website and through other outreach methods. A copy of the feedback process will be available upon request.

## **8.0 Design of Public Spaces**

GRETI is committed to ensuring its office layout, and relating public spaces are accessible to persons with disabilities. When planning new office space or extensive renovations to existing space, and when within GRETI's control, GRETI will ensure accessibility is addressed in public spaces such as queuing areas and service counters to facilitate Clients' ability to obtain goods and services. GRETI remains committed to ensuring the maintenance of any accessibility elements in its public spaces and will develop and maintain procedures for preventative and emergency maintenance of those elements. GRETI will also develop and maintain procedures for temporary disruptions when those elements are not in working order.

## **9.0 Transportation**

If requested, GRETI shall provide accessible transportation vehicles to people with disabilities who are eligible to use the services. If a transportation vehicle is not accessible to people with disabilities, then GRETI is required to provide an equivalent service to accommodate the needs of people with disabilities.

Equivalent service means that the transportation service is of similar quality to that provided to others using the organization's transportation services. The equivalent service would have the similar schedules and routes.

## **10.0 Accessibility Reporting**

GRETI, will file accessibility compliance reports every five years in accordance with the requirements set out in Ontario Regulation 191/11.

## **11.0 Availability of Documents**

GRETI will provide public notice of the availability of the documents required by the Accessibility Standards. Notice of availability will be provided on the website, through printed materials, and posted within GRETI's premises. Documents will be provided in an alternate format upon request. Policy documents will be provided, consistent with the requirements of the AODA and the Accessibility Standards.

## **12.0 Review**

This policy will be reviewed regularly to ensure that it is reflective of GRETI's current practices and legislative requirements of the AODA.

## **13.0 Inquiries**

Any inquiries on this Policy should be directed to:  
Laurie Froman - Director, Employment and Training  
P.O Box 69  
16 Sunrise Court  
Ohsweken, ON  
N0A 1M0  
Phone Number: 519-445-3102  
Fax Number: 519-445-4777  
Email: laurie@greatsn.com

## **14.0 Policy Review & Approval**

This Policy was approved by both Laurie Froman - Director Employment and Training and Erin Monture - Director, Business Opportunities on August 2, 2017. It will be reviewed at least once every three years and as new requirements under the AODA become effective.

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Director, Employment and Training

Signed: \_\_\_\_\_

Date: \_\_\_\_\_

Director, Business Opportunities

## **15.0 Effective Date**

This Policy is effective August 2, 2017.