

STATEMENT of POLICY			
Manual	<b>Human Resources</b>	Issued	27/06/2014
Policy	<b>Accessible Service Policy</b>	Effective	27/06/2014
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Version	Date of Issue	Summary of Changes	Submitted by
1	27/06/2014	Initial issue of the Policy	Human Resources
2	21/06/2018	Reissue	Derrick Brown

## 1 POLICY & STATEMENT OF COMMITMENT

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 a person with a disability.

The Customer Service Standards, Information and Communication Standards and the Design of Public Spaces Standards adopted under the Integrated Accessibility Standards (“IAS”) were established to ensure goods, services and facilities are, where at all possible, equally accessible to every member of the public.

Family and Children’s Services of Lanark, Leeds and Grenville (“FCSLLG”) endeavours to provide child protection services to the community in a manner that respects the dignity and independence of persons with a disability. FCSLLG also strives to ensure a person with a disability is able to access FCSLLG goods, services and facilities and receives the same benefit from those goods, services and facilities as any other member of the public. FCSLLG is committed to developing, implementing and maintaining policies aimed at meeting the accessibility needs of persons with a disability in a timely manner.

The objective of this policy (the “Policy”) is to identify and document how FCSLLG seeks to achieve compliance with the requirements of the IAS and how it will continue to work towards improving accessibility for persons with a disability.

## 2 SCOPE

The Policy applies to:

- a) Every person who is an employee of, or a volunteer with, FCSLLG.
- b) Every person who participates in developing FCSLLG’s policies.
- c) Every other person who provides goods, services or facilities on behalf of FCSLLG.

## 3 DEFINITIONS

- a) **Accessible Format** - May include, but is not limited to, large print, recorded audio and electronic format, braille and any other format usable by a person with a disability.
- b) **Assistive Device** - Any device used to assist a person in performing a particular task or tasks or to aid the person in an activity of daily living.

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- c) **Communication Support** - May include, but is not limited to, captioning, alternative and an augmentative communication support, plain language, sign language and any other support that facilitates effective communication.
- d) **Disability** – means:
- i. 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.
  - ii. A condition of mental impairment or a developmental disability.
  - iii. A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language.
  - iv. A mental disorder.
  - v. An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.
- e) **Guide Dog** - A guide dog as defined in section 1 of the *Blind Persons Rights’ Act* is a dog trained as a guide for a person who is blind and having qualifications prescribed by the regulations under the *Blind Persons’ Rights Act*.
- f) **New Internet Website** - means either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.
- g) **Service Animal** – means an animal:
- i. That can be readily identified as one that is being used by the person for reasons relating to the person’s disability, as a result of visual indicators such as the vest or harness worn by the animal.
  - ii. For which the person provides documentation from a member of the following regulated health professionals confirming the person requires the animal for reasons relating to the disability:
    - College of Audiologists and Speech-Language Pathologists of Ontario.
    - College of Chiropractors of Ontario.
    - College of Nurses of Ontario.

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- College of Occupational Therapists of Ontario.
  - College of Optometrists of Ontario.
  - College of Physicians and Surgeons of Ontario.
  - College of Physiotherapists of Ontario.
  - College of Psychologists of Ontario.
  - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.
- h) **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, services and facilities.
- i) **Web Content Accessibility Guidelines (“WCAG”)** – means the international standard for making a website and web content accessible to people with a wide-range of disabilities. The IAS requires an organization to become compliant with two levels of the WCAG - Level A and Level AA.

#### **4 ACCESSIBILITY PLAN**

FCSLLG has established and implemented an Accessibility Plan to outline its strategy to prevent and remove barriers for a person with a disability and meet the requirements of the IAS.

FCSLLG will maintain the Accessibility Plan in accordance with the requirements of the IAS and will review and update it at least once every five (5) years.

The Accessibility Plan is posted on FCSLLG’s website and will be made available in an Accessible Format, upon request.

#### **5 COMMUNICATION**

FCSLLG strives to communicate with a person with a disability in a manner that takes into account the individual’s disability.

##### **5.01 ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS**

Upon request, FCSLLG will provide or arrange for the provision of Accessible Formats and Communication Supports to make its communication or information about its goods, services and/or facilities accessible to a person with a disability. Accessible Formats and Communication Supports will be provided in a timely manner and at a cost no more than the regular cost charged to any other person.

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FCSSLG will consult with the person making the request when determining the suitability of an Accessible Format or Communication Support. FCSSLG will also notify the public of the availability of Accessible Formats and Communication Supports.

## 5.02 ACCESSIBLE WEBSITES AND WEB CONTENT

FCSSLG will ensure, where practicable, any New Internet Website and web content on such site(s) conforms with WCAG 2.0 Level A.

By January 1, 2021 FCSSLG will ensure, where practicable, any website or content on that site(s) published after January 1, 2012 conforms with WCAG 2.0 Level AA to the extent required by the IAS.

When determining whether meeting the requirements of this section are practicable FCSSLG will consider the availability of commercial software or tools required to achieve web accessibility; and the impact meeting the requirements of this section will have on any project planned before January 1, 2012.

The commitment to provide an accessible website and web content only applies to a website and web content FCSSLG controls directly or indirectly through a contractual relationship allowing for modification of the website or web content at issue.

## 6 ASSISTIVE DEVICES

FCSSLG will ensure that staff are trained and familiar with any Assistive Devices that are available on site or provided to individuals with disabilities while accessing FCSSLG goods or services.

Individuals may provide their own Assistive Devices for the purpose of obtaining, using and benefiting from FCSSLG goods, services and facilities provided they do not impede the safety of others and provided there is not a physical, technological or other type of barrier that prevents the use of the Assistive Device. In such circumstances, alternative measures will be identified to accommodate the needs of the individual with a disability in a safe and mutually acceptable manner.

It is the responsibility of the individual with a disability to ensure that his/her Assistive Device is operated in a safe and controlled manner at all times.

## 7 SERVICE ANIMAL

A person with a disability may enter FCSSLG premises accompanied by a Guide Dog or Service Animal, and keep the Guide Dog or Service Animal with them, if the public has access to such premises and the Guide Dog or Service Animal is not otherwise excluded by law.

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If a Guide Dog or Service Animal must be excluded by law, FCSLLG will provide the explanation for why and explore alternative ways to meet the individual's needs.

If it is not readily apparent that an animal is a Guide Dog or Service Animal, FCSLLG may ask for documentation proving the animal's status as a Guide Dog or Service Animal, and that the individual requires it for reasons relating to his or her disability.

It is the responsibility of the individual with a disability to ensure their Guide Dog or Service Animal is in control at all times. This includes being responsible for the Guide Dog or Service Animal's behaviour and any damage it inflicts to FCSLLG property or individuals.

## 8 SUPPORT PERSON

A person with a disability may enter FCSLLG's premises with a Support Person and have access to the Support Person while on the premises.

Where a Support Person is accompanying an individual with a disability for the purpose of assisting in a discussion involving confidential information, the employee working with this individual must first secure the written consent of the individuals concerned regarding such disclosure. In addition, all Support Persons are required to sign a confidentiality agreement.

FCSLLG may require a person with a disability to be accompanied by a Support Person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, FCSLLG determines:

- a) A Support Person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
- b) There is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

## 9 TRAINING

FCSLLG will provide initial training, and ongoing training as required under the IAS, to all persons to whom this Policy applies.

Training will include:

- a) A review of the purpose of the Act and requirements of the IAS.
- b) A review of the Policy.
- c) FCSLLG's obligations under the *Human Rights Code* as they relate to a person with a disability.

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- d) How to interact and communicate with persons with various types of disabilities.
- e) How to interact with persons with a disability who use an Assistive Device or require the assistance of a Service Animal or Support Person.
- f) How to use equipment or devices made available on FCSLLG premises to assist persons with a disability to obtain, use or benefit from FCSLLG's goods, services and facilities.
- g) What to do if a person with a disability is having difficulty accessing FCSLLG premises and/or services.

FCSLLG will maintain records of the individuals to whom training is provided and when the training occurred:

- a) Training Records for employees will be maintained by HR.
- b) Training records for volunteers will be maintained by the Volunteer Coordinator.
- c) Training records for foster parents will be maintained by the Resources Managers.

## 10 FEEDBACK PROCEDURES

FCSLLG welcomes and appreciates feedback regarding this Policy, its implementation and this feedback procedure itself. Feedback can be provided in the following ways:

- a) In person at any FCSLLG office location.
- b) In writing via the Accessibility Feedback Cards available at the Brockville and Perth locations.
- c) Electronically, either by email to [accessibility@fcsllg.ca](mailto:accessibility@fcsllg.ca) or through alternate means of providing electronic text (i.e. on a memory stick or diskette).

Where the feedback requires FCSLLG to take an action or where a complaint is received, FCSLLG will take the necessary action in response to the feedback or complaint. Human Resources will record and manage responses with the assistance of other departments as required. Documentation of any action taken in response to feedback or a complaint will be available upon request.

FCSLLG will also ensure that any processes it currently has or that it may develop in the future for receiving and responding to feedback are accessible to a person with a disability by providing or arranging for the provision of Accessible Formats and Communications Supports, upon request.

FCSLLG will make information about its feedback procedures readily available to the public and shall notify the public that Accessible Formats and Communication Supports are available upon request in respect of its feedback procedures.

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## 11 DESIGN OF PUBLIC SPACES STANDARDS

FCSLLG will ensure that any public spaces that it intends to redevelop or newly construct and which are covered by the Design of Public Spaces Standards meet the accessibility requirements contained in the legislation.

## 12 NOTICE OF TEMPORARY SERVICE DISRUPTION

FCSLLG will notify individuals if there is a planned or unexpected disruption of a facility or service a person with a disability may otherwise use to access FCSLLG's goods, services and facilities. The notice will be posted where it is likely to come to the attention of an individual likely to be using FCSLLG's goods, services or facilities, such as at the entrance of FCSLLG's premises and/or on the home page of FCSLLG's website.

The notice will include the following information:

- a) The facility or service that is unavailable.
- b) The anticipated duration of the disruption.
- c) The reason for the disruption.
- d) Alternative facilities or services, if available.

## 13 DOCUMENTATION TO BE MADE AVAILABLE

This Policy and any other documentation required by the IAS shall be made available to any member of the public upon request.

Notification of the availability of this documentation will be posted at a conspicuous place on the FCSLLG's premises, by posting it on FCSLLG's website, or by such other method as is reasonable in the circumstances.

## 14 FORMAT OF DOCUMENTS

FCSLLG will provide documents, or the information contained in documents, required to be provided under the IAS, to a person with a disability in an Accessible Format or with a Communication Support, upon request.

Where a request is so made, the document(s) will be provided in a timely and in a manner that takes into account the person's accessibility needs due to disability. The document will also be provided at a cost that is no more than the regular cost charged to other persons.

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FCSLG will consult with the person making the request in determining the suitability of an Accessible Format or Communication Support.

## 15 QUESTIONS ABOUT THIS POLICY

For more information about the Policy please contact:

Derrick Brown, Human Resources Manager

## 16 APPENDICES

- a) Consent Form for Support Persons
- b) Confidentiality Agreement for Support Persons
- c) Accessibility Feedback Cards
- d) Template for Providing Notice of Temporary Disruption of Service