



<b>TITLE:</b>	
<b>ACCESSIBILITY FOR PEOPLE WITH DISABILITIES</b>	
<b>EFFECTIVE:</b>	<b>LAST UPDATE:</b>
JULY 2014	JULY 2020
<b>CATEGORY:</b>	<b>APPROVED BY (DATE):</b>
ADMINISTRATION	BOARD OF DIRECTORS (OCTOBER 15, 2014)
<b>REFERENCES:</b>	
ADMIN-001 – Development, review, approval, distribution and cancellation of policies and procedures ADMIN-009 - Privacy protection RH-001 - Overall staffing RH-007 - Modified work and permanent accommodations	

## 1. POLICY

The *Accessibility for Ontarians with Disabilities Act (AODA)* was adopted in 2005 by the province of Ontario, requiring the development of accessibility standards for all Ontarian organizations and businesses, in order to achieve full accessibility for Ontarians with disabilities by year 2025.

As an organization employing more than 50 staff members, Montfort Renaissance (MRI) has a duty and the legal obligation to comply with the various provisions contained in the AODA.

MRI strives to be a leader in terms of accessibility in Ontario. Our objective is to provide accessible services and facilities for all our staff members, clients and their families, as well as for our visitors.

MRI develops and updates the policies pertaining to the way MRI meets the requirements of the AODA, and is committed to offering its services in accessible format, upon request.

MRI makes all reasonable efforts to ensure its policies, practices and procedures are compatible with fundamental principles of dignity, autonomy, integration and equal access, by:

- Ensuring that all clients receive the same value and quality of services.
- Allowing clients who have disabilities to act by their own means and at their own pace when they access our facilities and services, as long as this doesn't constitute a security risk and doesn't contravene with any of our health and safety policies.
- Considering individual needs in the delivery of services.
- Communicating in a way that considers the client's disabilities.

MRI considers accessibility options when obtaining or acquiring goods, services and facilities. Should such options not be reasonably practicable, MRI will provide an explanation upon request.

Montfort Renaissance provides information on the present policy and each of its requirements in accessible format, upon request, and also provides appropriate communication supports.

MRI develops a multi-year accessibility plan which describes the overall measures taken in order to detect, eliminate and prevent barriers for people with disabilities, whether they work for MRI or receive services provided by MRI. This is an update which reflects all the progress made to meet the needs set forth in the plan. The accessibility plan as well as related reports are developed by the Human Resources Department, in collaboration with joint health and safety committees (JHSC), and are approved by the Board of Directors.

Montfort Renaissance provides its staff members with training on accessible customer service as well as on AODA standards and requirements, in order to ensure a better quality of service and accessibility for people with disabilities.

The goal of MRI is to establish policies, practices and procedures designed to ensure that all Montfort Renaissance points of services are accessible to its clients and any other person, in accordance with the *Accessibility for Ontarians with Disabilities Act (AODA), 2005*. MRI commits to providing people with disabilities with the same opportunities to access services and to allowing them to benefit from the same services as other people.

In that sense, this policy applies to all Montfort Renaissance staff members and service providers who deal with the public or participate to the development of Montfort Renaissance policies, practices and procedures governing the provision of services and facilities to the public. This policy also applies to our clients, their families and our visitors who have disabilities, whether those disabilities are visible or invisible at first glance.

## 2. DEFINITIONS

**Communication supports:** As defined per the 191/11 Integrated Accessibility Standards Regulation, these may include captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.

**Service animal:** As defined per the Accessibility Standards for Customer Service, paragraph 4(9), an animal is a service animal for a person with disabilities in one of more of the following cases:

- a) It is readily apparent that the animal is used by the person with a disability for reasons relating to his or her disability.
- b) The person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

**Assistive aid or device related to mobility:** Cane, walker, similar aid or device (known as “mobility assistive devices”).

**Accessible format:** Under the 191/11 Integrated Accessibility Standards regulation, implies a large print format, a recorded audio or electronic format, braille, and any other format that can be used by people with disabilities.

**Disability:** As defined by the AODA, may mean, as the case may be:

- a) Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, among others, diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impairment, deafness or hearing impairment, muteness or speech impairment, or physical reliance on a guide dog or 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.

**Staff members:** All MRI employees, whether full-time or contract employees, volunteers, interns or students.

**Senior staff members:** All full-time MRI employees occupying a position with a supervising or managing role.

**Barrier:** According to the AODA, anything that keeps someone with a disability from participating fully in all aspects of society as a result of their disabilities. Examples of barriers include architectural or structural barriers, information or communication barriers, attitudinal barriers, technological barriers, or any barrier resulting from a policy or a practice.

**Support person:** Person who accompanies a person with a disability in order to assist with communication, mobility, personal care or medical needs, or with access to goods or services.

### 3. RESPONSIBILITIES

**Senior management staff members:**

- Ensure the observance of the accessibility standards and procedures by staff members.
- Gather the suggestions of staff members on ways to improve policies and procedures.

**Human Resources Department:**

- Ensure accessibility best practices are properly carried.

- Ensure the required policies and procedures (P & P) are reviewed, updated and approved.
- Provide all necessary documentation and training to staff members.
- Keep an up-to-date record of all staff members who have received the training.

**Staff members:**

- Get familiar with the policies and procedures, and comply with them.
- Get the required training.
- Share all means by which the organization's policies and procedures could be improved with the appropriate senior management staff member.

**Members of the JHSC:**

- Review policies and procedures related to the responsibilities of the committee, in accordance with the established schedule.
- Comply with MRI's policies and procedures by fulfilling associated responsibilities.
- Identify, get familiar with, and understand the structures, laws, regulation, policies, procedures, practices and services related or applicable to Montfort Renaissance in terms of accessibility and barriers to accessibility that people with disabilities are regularly faced with.
- Develop, review and apply a five-year accessibility plan.
- Assess the progress and determine if the plan's goals are met.
- Be ambassadors for "Montfort Renaissance" on ways to remove barriers within the organization.

## **4. PROCEDURES**

### **Compliance**

Policies, practices and procedures related to the AODA are reviewed and updated in accordance with the scheduled timetable (ADMIN-001 - Development, review, approval, distribution and cancellation of policies and procedures) to ensure they comply with the regulations on accessibility standards and all obligations prescribed by the Act. Non-compliance to regulation set forth under the AODA might result in financial penalties imposed by the Government of Ontario.

The Human Resources Department provides advice for the implementation of this policy and the senior management staff members ensure that they, along with the staff members, are familiar with the present policy and comply with it.

### **Accessible Customer Service Standards**

Montfort Renaissance intends to fulfill its duties and responsibilities with respect to the AODA by complying with the following practices and principles:

#### **Supplying services, facilities and devices to people with disabilities**

Montfort Renaissance is committed to offering quality services to all its clients, including people with disabilities.

#### **Assistive devices**

Montfort Renaissance will ensure all staff members are familiar with the various assistive devices available on site or provided to facilitate access to services and facilities for people with disabilities.

Montfort Renaissance is committed to providing all staff members with the appropriate training regarding the proper use and operating of assistive devices.

Individuals with disabilities can use their own assistive devices to access the services and facilities of Montfort Renaissance.

Should an assistive device constitute a safety risk, or should accessibility be problematic, other reasonable measures will be used to ensure access to facilities and services.

#### **Service animals**

Montfort Renaissance welcomes people with disabilities accompanied by their service animals. Those animals are authorized in the sections of the premises open to the public or to third parties. Should this be prohibited by law or regulations, Montfort Renaissance will take other measures to offer services to these people.

#### **Support persons**

A person with disabilities accompanied by a support person will be allowed access to the services and the full support of their accompanying support person on the organization's premises.

In situations where the issue of confidential information sharing might arise, the client will have to give his or her verbal or written consent in front of a witness, prior to any information disclosure. (ADMIN-009 – Privacy protection).

Montfort Renaissance may require a person with disabilities to be accompanied by a support person while on the premises, but only after consulting the person and taking the following into account: the presence of the support person is indeed necessary to ensure the health and safety of the person with disabilities, which cannot be achieved by any other means.

### **Temporary disruption notice**

In case of expected or unexpected interruption or disruption of services, facilities or devices for clients with disabilities, like an elevator or automatic doors, Montfort Renaissance will inform its staff members and clients as soon as possible.

A clearly posted notice will contain information on the reason for the disruption or the interruption, the expected duration and a description of alternative options available, if applicable. This notice will be posted on bulletin boards in shared spaces and anywhere else in the workplace that might be of benefit to the clients, the visitors and the personnel.

### **Feedback and complaint process**

All the information related to MRI's feedback process is publicly available.

Clients who wish to share feedback and comments on the way Montfort Renaissance offers facilities and services to people with disabilities can do so verbally, in person or in written form, by completing the feedback form available on the website and on the bulletin boards intended for clients.

Complaints will be handled according to policy ADMIN-005 – Complaints management for clients.

All complaints will be dealt with in a confidential manner and will only serve to improve client service.

Feedback and complaints will be analyzed, and all changes will be made according to gathered information, if appropriate.

### **Training and compliance**

Training related to accessibility for people with disabilities is mandatory for all Montfort Renaissance staff members. Different training formats are available for volunteers and interns.

This training will touch upon:

- The purpose of the Accessibility for Ontarians with Disabilities Act, S.O. 2005.
- The requirements of the Accessible Customer Service Standard.
- How to interact with people with various types of disabilities.
- How to interact with people who use an assistive device or aid, or require the assistance of a service animal or a support person.
- What to do if a client with a disability is having difficulty accessing Montfort Renaissance's goods, services and facilities.

The members of the JHSC also have access to more comprehensive training on their duties and responsibilities as members of joint health and safety committees.

## **Information and Communication Accessibility Standards**

### **Communication supports**

Individuals communicate in different ways depending on the number and the type of their disabilities and deficiencies, their personality, their preferences, their needs, their abilities and the circumstances of the communication. MRI therefore communicates with these people in a way that takes into consideration their disability, at a cost no greater than the usual cost.

The team from Montfort Renaissance will ask each person with disabilities how they would like staff members to communicate with them.

Upon request, Montfort Renaissance provides invoices in the following formats: in large print, by email or printed. MRI answers all questions from its clients regarding invoices, either in person, by phone or through email.

Montfort Renaissance's website shall comply with levels A and AA of the *Web Content Accessibility Guidelines (WCAG)*, no later than January 1<sup>st</sup>, 2021.

Information on emergency plans and measures will be provided upon request in an accessible format or with appropriate communication aids, as soon as practicable.

## **Employment Standards**

### **Evaluation and selection process**

Montfort Renaissance informs each job applicant, through the job posting process, that accommodations are available upon request for people with disabilities (RH-001 – Overall staffing).

Montfort Renaissance informs all new staff members of the existence of the accommodation measures policies for people with disabilities. MRI provides this information as soon as practicable.

### **Information related to support measures**

Montfort Renaissance informs its staff members of its policies regarding workplace accommodations in order to take into consideration the accessibility requirements resulting from each employee's disability.

Montfort Renaissance informs all staff members of changes to its existing policies.

### **Information regarding emergency measures in the workplace**

Montfort Renaissance shares individualized information regarding emergency interventions in the workplace to staff members with disabilities, as soon as practicable after becoming aware of their needs in terms of accommodations due to their disability.

### **Accessible formats and communication supports for staff members**

At the request of the employee, Montfort Renaissance consults the staff member in order to offer them accessible formats and communication supports regarding: the information necessary to carry on their work and the information provided to all staff members in the workplace.

Montfort Renaissance consults the staff member who made the request at the point of determining the relevance of an accessible format and a communication support.

### **Individualized and documented accommodation plans**

Montfort Renaissance develops a written process for the preparation of individualized and documented accommodation plans for staff members with disabilities (RH-007 - Modified work and permanent accommodations). Those plans, which are provided upon demand, cover the accessible formats and communication supports, the individualized information related to emergency interventions in the workplace, as well as all other accommodations.

### **Return-to-work process**

Montfort Renaissance develops and implements a written return-to-work process for all its staff members who need to take time off work due to a disability and require accommodations specific to their disability in order to go back to work (RH-007 – Modified work and permanent accommodations). This process outlines the measures taken by MRI to facilitate the return to work, and it integrates individualized accommodation plans.

## **ADDITIONAL INFORMATION**

For further information, please contact:

*Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*  
Contact Centre (*Service Ontario*)  
Toll-free: 1 866 515-2025  
TTY: 416-325-3408 / Toll-free: 1 800 268-7095  
Fax: 416-325-3407

What you will find there:

Frequently asked questions about the AODA.

An easy-to-understand guide to the AODA. Updates on the development of standards.

To read the act:

Visit the Government of Ontario e-Laws website: [www.e-laws.gov.on.ca](http://www.e-laws.gov.on.ca)

Refer to the Integrated Accessibility Standard, Ontario Regulation 191/11 website, updated July 1<sup>st</sup>, 2016: <https://www.ontario.ca/laws/regulation/110191>

## **5. REFERENCES AND RELATED REGULATIONS**

*Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*

*Accessibility Standards for Customer Service (2008), Ontario Regulation 429/07 made under the AODA*

*Integrated Accessibility Standards (2011), Ontario Regulation 191/11 made under the AODA*