



# **Multi-Year Accessibility Plan 2019 to 2024**

***January, 2019***



*Helping Children, Youth and Families Thrive*



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# Table of Contents

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<b>Overview</b> .....	<b>1</b>
<b>Policy</b> .....	<b>2</b>
<b>Definitions</b> .....	<b>3</b>
<b>Summary of Actions as of January 1, 2013</b> .....	<b>4</b>
<b>Multi Year Accessibility Plan</b> .....	<b>5</b>
<b>General</b> .....	<b>5</b>
<b>Accessibility Policies</b> .....	<b>5</b>
<b>Accessibility Plans</b> .....	<b>5</b>
<b>Training</b> .....	<b>5</b>
<b>Information and Communications</b> .....	<b>6</b>
<b>Feedback</b> .....	<b>6</b>
<b>Accessible Formats and Supports</b> .....	<b>6</b>
<b>Accessible Websites and Web Content</b> .....	<b>7</b>
<b>Employment Standards</b> .....	<b>7</b>

For more information on the accessibility plan, please contact:  
Michelle McGaw, Director of Human Resources  
telephone: 905.333.4441 | email: [MMcGaw@haltoncas.ca](mailto:MMcGaw@haltoncas.ca)





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# Overview

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## Vision

Helping Children, Youth and Families Thrive.

## Mission

In partnership with families and the community, the Halton Children's Aid Society's mission is to protect children and enable them to grow and realize their potential within a safe and nurturing environment.

## Values Statement

The motivating force behind all of the decisions of the Halton Children's Aid Society (Halton CAS) is based on the core values outlined below.

We believe that:

- Children and youth are valued members of family and community.
- Children, youth and families deserve to be treated with fairness, equity and respect.
- Children and youth have a right to grow, develop and be nurtured – according to their individual needs – within the context of family and community.
- Children and youth are entitled to be protected from harm and receive consistent and supportive care.
- Families are the primary source of safety, stability and nurturing.
- Enabling and empowering children, youth and families to foster healthy relationships is central to all efforts of the Halton Children's Aid Society.
- The uniqueness and diversity of children, youth and families are honoured and respected.
- Families are supported in their efforts to be self-reliant, responsible parents and citizens.
- To be responsive to children, youth and families, a community-based and flexible approach to service delivery that recognizes and builds on strengths is paramount.
- It is an obligation of the Halton Children's Aid Society to advocate for the well-being of families and the protection of children and youth.
- Confidentiality is respected.
- Collaboration with community partners results in improved outcomes for children, youth and families.
- Accountability to children, youth, families, community and donors is critical.
- Employees will be treated with fairness, equity and respect for diversity and the organization will promote innovation and best practices for managing change





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## Accessibility Policy

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The Halton Children's Aid Society (Halton CAS) is committed to always respecting the dignity and independence of people. We believe in integration and opportunity and are committed to meeting the needs of people with disabilities by removing barriers to accessibility through the timely review and development of policies that meet or exceed the *Accessibility for Ontarians with Disabilities Act*.

The purpose of this Policy is to ensure the Halton CAS is compliant with the requirements of the *Accessibility for Ontarians with Disabilities Act* (AODA) and that we address accessibility policies and standards required by the Integrated Accessibility Standards Regulations (IASR). This Policy compliments Halton CAS Accessibility Standards for Customer Service Policies and Procedures.

This Policy applies to all Halton CAS staff, volunteers, students on placement and third parties operating on behalf of the Society in the provision of goods, services or facilities to the public or employees.

All services provided by the Halton CAS and all interactions with our staff and the community follow the ideals of dignity, independence, integration and equal opportunity. We will meet or exceed all applicable legislation regarding accessibility.

The Halton CAS will establish a multi-year accessibility plan documenting the steps to be undertaken to meet the requirements of the IASR and will ensure ongoing policy development to prevent and remove barriers to accessibility.

The multi-year accessibility plan is posted on our website and will be made available in accessible formats upon request. The plan will be reviewed at least every five years.

The Director of Human Resources is responsible for leading the implementation of the initiatives contained in the multi-year accessibility plan and ensuring the Halton CAS meets its target completion dates. The Director of Human Resources will consult with individuals or groups with disabilities during the implementation of the plan.

The Halton CAS will annually update the status of the accessibility plan to ensure compliance with the IASR.





## Definitions

The AODA and IASR contain and refer to various definitions that are relevant to this plan, some of which are set out below.

**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.

**Alternative Format**—any other ways of publishing information beyond traditional printing, e.g., large print, audio format, etc.

**Assistive Device**—an auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs, hearing aids, etc).

**Barrier**—anything that prevents a person with a disability from fully participating in all aspects of society because of their disability including a physical barrier, architectural barrier, information or communications barrier, attitudinal barrier, technological barrier, policy or practice.

**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.

**Conversion Ready**—means an electronic or digital format that facilitates conversion into an accessible format.

**Disability**—shall mean the same as the definition of disability found in the *Ontario 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 (“handicap”).

**Persons with Disabilities**—those individuals that are afflicted with a disability as defined under the *Ontario Human Rights Code*.

**Information**—includes data, facts and knowledge that exist in any format including text, audio, digital or images and that convey meaning.





## Summary of Actions as of January 1, 2013

Regulatory Requirement	Actions	Completion Date
<p><b>Accessibility Standard for Customer Service</b></p> <p>Policy and Procedures were developed that comply with the <i>Accessibility Standard for Customer Service</i> including:</p> <ul style="list-style-type: none"> <li>• provision of goods and services to persons with disabilities;</li> <li>• the use of assistive devices;</li> <li>• the use of guide dogs, service animals and service dogs;</li> <li>• the use of support persons;</li> <li>• notice of service disruptions;</li> <li>• customer feedback;</li> <li>• training; and</li> <li>• notice of availability and format of documents.</li> </ul> <p>Policies and Procedures are consistent with the core principles of independence, dignity, integration and equal opportunity.</p>	<ul style="list-style-type: none"> <li>• Posted Customer Service Policy to website under menu item 'Accessibility.'</li> <li>• Staff trained on Customer Service Policy during 2012 and annual review thereafter.</li> </ul>	<p>November 11, 2011</p>
<p>Online report to be completed by January 1, 2013.</p>	<ul style="list-style-type: none"> <li>• Copy of report available upon request.</li> </ul>	<p>January 1, 2013</p>
<p><b>Integrated Accessibility Standards Regulation (IASR)</b></p> <p>The Halton CAS shall provide individualized workplace emergency response information to employees who have a disability if the disability is such that the individualized information is necessary and Human Resources is aware of the need for accommodation due to the employee's disability.</p>	<ul style="list-style-type: none"> <li>• Incorporated into Human Resources Policies and Procedures.</li> </ul>	<p>December 31, 2012</p>





## Multi-Year Accessibility Plan

Section I—General	Action Plans/Status	Compliance Date
<b>3.0 Establish Accessibility Policies</b>		
3.1 <i>Develop, implement and maintain policies governing how the Halton CAS achieves or will achieve accessibility through meeting its requirements referred to in IASR.</i>	<ul style="list-style-type: none"> <li>Developed Accessibility Policy incorporating statement of commitment and plan to achieve compliance with IASR through ongoing policy review.</li> </ul>	January 1, 2014 Completed <input checked="" type="checkbox"/>
3.2 <i>Include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in the Halton CASs policies.</i>	<ul style="list-style-type: none"> <li>The Halton CAS has developed an organizational statement of commitment, which is incorporated into an Accessibility Policy and included in the Accessibility Plan.</li> </ul>	January 1, 2014 Completed <input checked="" type="checkbox"/>
<b>4.0 Accessibility Plans</b>		
4.1 <i>The Halton CAS shall:</i> <ul style="list-style-type: none"> <li><i>establish, implement, maintain and document a multi-year accessibility plan outlining the organization's strategy to prevent and remove barriers and meet its requirements under IASR;</i></li> <li><i>post the plan on our website, provide the plan in an accessible format upon request, and;</i></li> <li><i>review and update the plan at least once every five years.</i></li> </ul>	<ul style="list-style-type: none"> <li>Accessibility Plan developed and approved by Leadership Team by December 31, 2013.</li> <li>Accessibility Plan posted on website and provided in an accessible format, if requested.</li> <li>Accessibility Plan will be reviewed annually and at least by 2018.</li> </ul>	January 1, 2014 Completed <input checked="" type="checkbox"/>
<b>7.0 Training</b>		
7.1 <i>The Halton CAS shall ensure training is provided on the requirements of accessibility standards referred to in IASR and on the Human Rights Code as it pertains to persons with disabilities to all employees, volunteers, persons who participate in developing the Halton CASs policies and all other persons who provide goods, services or facilities on behalf of the Halton CAS.</i>	<ul style="list-style-type: none"> <li>Provided training on AODA Customer Service Standards in 2012 and also requires annual review.</li> <li>Training on Human Rights Code and IASR accessibility standards will be provided to all employees, volunteers and persons who provide services on behalf of the Halton CAS by December 31, 2014. Ontario government has indicated it will develop training materials and these and others will be utilized once available. Human Resources will arrange training.</li> </ul>	January 1, 2015 Completed/on-going <input checked="" type="checkbox"/>
7.2 <i>The training requirements referred to in subsection 7.1 shall be appropriate to the duties of the employees, volunteers and other persons.</i>	<ul style="list-style-type: none"> <li>Training materials will be assessed by Human Resources and the Leadership Team and tailored to the target audience.</li> </ul>	January 1, 2015 Completed <input checked="" type="checkbox"/>
7.3 <i>Every person referred to in subsection 7.1 shall be trained as soon as practicable.</i>	<ul style="list-style-type: none"> <li>A training plan will be developed to deliver training during 2014.</li> </ul>	January 1, 2015 Completed <input checked="" type="checkbox"/>



## Multi-Year Accessibility Plan

<p>7.4 The Halton CAS shall provide training in respect of any changes to the Accessibility Policies in section 3.0 on an ongoing basis.</p>	<ul style="list-style-type: none"> <li>Annual AODA training refresher is provided to employees. New and/or changed policies are provided to employees and posted on the intranet. This will be expanded to include volunteers and other stakeholders.</li> </ul>	<p>January 1, 2015 Completed/ongoing <input checked="" type="checkbox"/></p>
<p>7.5 The Halton CAS shall keep a record of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p>	<ul style="list-style-type: none"> <li>The Human Resources Department maintains employee training records. This will be expanded to include volunteers and other stakeholders.</li> </ul>	<p>January 1, 2015 Completed/ongoing <input checked="" type="checkbox"/></p>
<p><b>Section II—Information and Communication Standards</b></p>		
<p><b>11.0 Feedback</b></p>	<p><b>Action Plans/Status</b></p>	<p><b>Compliance Date</b></p>
<p>11.1 The Halton CAS shall ensure that processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports upon request.</p>	<ul style="list-style-type: none"> <li>Current communication processes for persons with disabilities are made available and organizational commitment is documented in the <i>AODA Customer Service Standards Policies</i>. The Halton CAS will review feedback processes to ensure they note that accessible formats and communications supports are available upon request.</li> </ul>	<p>January 1, 2015 Completed <input checked="" type="checkbox"/></p>
<p>11.2 This will not detract from obligations under the Accessibility Standards for Customer Service.</p>	<ul style="list-style-type: none"> <li>Ensure feedback process compliment Accessibility Standards for Customer Service.</li> </ul>	<p>January 1, 2015 Completed <input checked="" type="checkbox"/></p>
<p>11.3 The Halton CAS shall notify the public about the availability of accessible formats and communications supports.</p>	<ul style="list-style-type: none"> <li>Feedback processes will be reviewed to ensure they note that accessible formats and communications supports are available upon request.</li> </ul>	<p>January 1, 2015 ADOA</p>
<p><b>12.0 Accessible Formats and Communication Supports</b></p>		
<p>12.1 The Halton CAS shall upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities:</p> <ul style="list-style-type: none"> <li>in a timely manner that takes into account the person's accessibility needs; and</li> <li>at a cost that is no more than the regular cost charged to other persons.</li> </ul>	<ul style="list-style-type: none"> <li>The Halton CAS AODA Customer Service Standard Polices with respect to Communication with Persons with Disabilities contains commitment to provide or arrange for the provision of accessible formats or communication supports upon request. The Halton CAS will conduct a Policy review to determine if amendments are necessary.</li> </ul>	<p>January 1, 2016 Completed/ongoing <input checked="" type="checkbox"/></p>
<p>12.2 The Halton CAS shall consult with the persons making the request in determining the suitability of an accessible format or communications support.</p>	<ul style="list-style-type: none"> <li>The Halton CAS AODA Customer Service Policy contains this requirement.</li> </ul>	<p>January 1, 2016 Completed <input checked="" type="checkbox"/></p>





12.3 <i>The Halton CAS shall notify the public about the availability of accessible formats and communication supports.</i>	<ul style="list-style-type: none"><li>• The Halton CAS will review methods we utilize to inform the public to ensure widespread communication.</li></ul>	January 1, 2016 Completed/ongoing <input checked="" type="checkbox"/>
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## Multi-Year Accessibility Plan

14.0 Accessible Websites and Web Content		
14.2 <i>The Halton CAS shall make internet website and web content conform to WCAG 2.0 Level AA.</i>	<ul style="list-style-type: none"> <li>As the website evolves and improves, the Halton CAS will incorporate WCAG 2.0 Level AA design.</li> </ul>	January 1, 2021 In progress
Section III—Employment Standards	Action Plans/Status	Compliance Date
22. <i>Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes</i>	<ul style="list-style-type: none"> <li>Human Resources to amend job posting and recruitment advertising to add a statement advising that Halton CAS will provide accommodation if requested at any stage of the recruitment process.</li> </ul>	January 1, 2016 Completed <input checked="" type="checkbox"/>
23. (1) <i>During a recruitment process, the Halton CAS shall 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.</i> (2) <i>If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability</i>	<ul style="list-style-type: none"> <li>Human Resources to review and amend Recruitment Policies and processes to add a requirement to advise selected candidates of availability of accommodation, upon request, for recruitment materials or processes.</li> </ul>	January 1, 2016 Completed <input checked="" type="checkbox"/>
24. <i>The Halton CAS shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</i>	<ul style="list-style-type: none"> <li>Human Resources to amend offer of employment letters to advise successful candidate of Halton CAS accommodation policies.</li> </ul>	January 1, 2016
25.(1) <i>The Halton CAS shall inform its employees of its policies used to support its 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 disability.</i> (2) <i>The Halton CAS shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</i> (3) <i>The Halton CAS shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</i>	<ul style="list-style-type: none"> <li>Human Resources will advise employees of workplace accommodation Policies.</li> <li>Halton CAS requires annual attestation from employee's that they have reviewed Human Resource Policies during the previous year during the Performance Appraisal process. New or revised HR Policies are brought to the attention of all staff and are posted on the Halton CAS intranet.</li> </ul>	January 1, 2016 Completed <input checked="" type="checkbox"/>



## Multi-Year Accessibility Plan

<p>26.1 <i>In addition to its obligations under section 12, where an employee with a disability so requests it, the Halton CAS shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</i></p> <p><i>(a) information that is needed in order to perform the employee's job; and</i></p> <p><i>(b) information that is generally available to employees in the workplace. O. Reg. 191/11, s. 26 (1).</i></p> <p><i>2. The Halton CAS shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</i></p> <p><i>28.(1) The Halton CAS shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</i></p> <p><i>(2) The process for the development of documented individual accommodation plans shall include the following elements:</i></p> <ol style="list-style-type: none"> <li><i>1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</i></li> <li><i>2. The means by which the employee is assessed on an individual basis.</i></li> <li><i>3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to determine if and how accommodation can be achieved.</i></li> <li><i>4. 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 agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</i></li> </ol>	<ul style="list-style-type: none"> <li>• Upon request from an employee, the Halton CAS shall make information available in accessible formats any work related or job information, after consulting with the employee.</li>   <li>• Human Resources will review and revise accommodation policies and practices to comply with this section.</li> </ul>	<p>January 1, 2016 Completed <input checked="" type="checkbox"/></p> <p>January 1, 2016</p>
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## Multi-Year Accessibility Plan

<p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</p> <p>(3) Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) identify any other accommodation that is to be provided.</p>		
<p>29.(1) The Halton CAS:</p> <p>(a) shall develop and have in place 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; and</p> <p>(b) shall document the process.</p> <p>(2) The return to work process shall,</p> <p>(a) outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and</p> <p>(b) use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>(3) The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute</p>	<ul style="list-style-type: none"> <li>Human Resources to review and revise Return to Work Policies and practices to comply with this section.</li> </ul>	<p>January 1, 2016</p>



## Multi-Year Accessibility Plan

<p>30.(1) <i>An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</i></p> <p>(2) <i>In this section, —performance management   means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.</i></p>	<ul style="list-style-type: none"> <li>• Human Resources to review and revise Performance Management Policies and practices to comply with this section.</li> </ul>	<p>January 1, 2016 Completed <input checked="" type="checkbox"/></p>
<p>31.(1) <i>An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities.</i></p> <p>(2) <i>In this section, —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.</i></p>	<ul style="list-style-type: none"> <li>• Human Resources to review and revise Career Development Policies and practices to comply with this section.</li> </ul>	<p>January 1, 2016 Completed <input checked="" type="checkbox"/></p>
<p>32.(1) <i>An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities.</i></p> <p>(2) <i>In this section, —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.</i></p>	<ul style="list-style-type: none"> <li>• Human Resources to review and revise Redeployment Policies and practices to comply with this section.</li> </ul>	<p>January 1, 2016 Completed <input checked="" type="checkbox"/></p>