

Accessibility Policy

Policy Number	B-05
Approved (Date)	Dec 18, 2012
Revision Date	May 26, 2021
Approved by	Sr. Management Team

Policy statement

Fontbonne Ministries recognizes the dignity and worth of every individual and seeks to create socially inclusive spaces in which all persons are able to participate fully. Building on a culture that embraces diversity and treats each person with respect, Fontbonne Ministries is committed to eliminating barriers and improving accessibility to its programs and services.

Purpose

The goal of the Accessibility for Ontarians with Disabilities Act (AODA), 2005, is to make Ontario accessible to people with disabilities by 2025. The AODA details specific requirements and standards for accessibility in Ontario. They include Accessibility Standards for Customer Service, along with integrated regulations with specific standards for information and communication, employment and transportation and the design of public spaces.

Fontbonne Ministries in keeping with its Mission and Values, shall make every effort to ensure that its policies, procedures, and practices adhere to the guiding principles established in the Accessibility Standards for Customer Service: Ontario Regulation 429/07 and the Integrated Accessibility Standards Regulation (IASR): Ontario Regulation 191/11.

Further, Fontbonne Ministries is committed to meeting the spirit, intent, and requirements of the following pieces of legislation:

- Ontarians with Disabilities Act, 2001 (ODA); and
- The Ontario Human Rights Code.

Scope

This policy applies to all employees, volunteers, students and onsite third-party service providers at any of the Fontbonne Ministries premises. The application of this policy also extends while engaging in program services or events on behalf of Fontbonne Ministries offsite.

Definitions

Accessible - means that one's service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached; or entered; obtainable.

Accessible Formats - are formats usable by persons with disabilities that may include but are not limited to large print/text, recorded audio and electronic formats, text saved as a Word document, plain language versions, braille and HTML or electronic text version on line that meet the WCAG 2.0 level A or AA format.

Accessibility Standard – a rule that persons and organizations must follow to identify, remove and prevent barriers to accessibility.

Accommodation – the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodations will vary depending on the customer's and/or employee's unique needs.

Assistive Device - any device that is designed/adapted to assist a person to perform a particular task and/or used to increase, maintain or improve the functional abilities of people with disabilities. Assistive devices include but are not limited to:

- Physical assistive devices – cane, walker, wheelchair, electrical scooter, grasp devices
- Communication devices – interpreters, hearing amplifiers/aids, cell phones, screen reader
- Visual devices – magnification aids, Braille, white cane, glasses
- Medical assistive devices – personal oxygen tanks

Barrier - is anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communication barrier, an attitudinal barrier, a technological barrier, a policy or practice obstacle.

Communication Supports - are formats that facilitate effective communication that may include but are not limited to sign language, screen reader software, verbal explanation of a written document, captioning, and alternative and augmentative communication supports.

Disability - as defined by the *Accessibility for Ontarians with Disabilities Act, 2005* and the Ontario Human Rights Code

- a) 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,
- 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, or
- 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*

Disabilities may differ in severity, be visible as well as non-visible, and they may come and go.

Equity - is the experience of, appropriate, fair and consistent quality of service by all people, attending especially to those who have been historically excluded from receiving equitable access; and fair and appropriate elimination of barriers to access of service.

Guide Dog - a guide dog as defined in Section 1 of the Blind Persons Rights' Act (1990), is a dog trained for a blind person and having qualifications prescribed by the regulations under the Blind Persons Rights' Act (1990).

Inclusive - is to create an environment in which all people have both the feeling and reality of belonging and thus are able to perform to their full potential.

Independence - is the condition of being free; the power to act or speak or think without externally imposed restraints or barriers.

Integrated Services - allow people with disabilities to fully benefit from the same services, in the same place and in the same or similar manner as other customers/persons.

Service Animal - as defined by the Accessibility Standards for Customer Service (*Ontario Regulation 429/07*), an animal is a service animal for a person with a disability if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or if the person provides a letter from a physician or nurse confirming that he person requires the animal for reasons relating to the disability. A service animal is not a pet, but considered a working animal. The majority of service animals are dogs, but other animals may also be used.

Support Person - as defined by Accessibility Standards for Customer Service (*Ontario Regulation 429/07*), a support person means in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services. A support person may be a paid professional, a volunteer, a family member or friend of the person with a disability.

Unconvertible – means that it is not technically feasible to convert a document/information and/or that the technology to convert the information or communication is not readily available.

Procedures

Customer Service Standard, Ontario Regulation 429/07, 2008

Personal Assistive Devices and Accommodation

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities. **If applicable, identify other measures:**

Incorporating Reasonable Effort

Each request for accommodation will be reviewed on a case-by-case basis. If necessary, the accommodation may involve providing the service at another time, in another location, in another manner, providing assistive devices or equipment, or other reasonable measures that takes into consideration the person's disability. Staff

will give consideration to the person's preferences. However, accommodation provided may not be the person's first choice of accommodation options.

When determining the most appropriate form of accommodation, staff will consider but not be limited to the following:

- the cost of the accommodation;
- the availability and cost of alternative solutions;
- the likelihood the accommodation will negatively affect the ability of others to obtain, use or benefit from Fontbonne's goods or services; and
- the likelihood that the accommodation will pose a risk to the health or safety of the person with the disability or others

In situations where staff and the person with the disability are unable to find an agreeable solution, the person will be referred to the Manager, and the established forum for complaints relating to accessibility. In the event that a person loses his/her personal assistive devices while onsite at one of Fontbonne Ministries sites, they are to follow-up with the site Manager for assistance.

Guide/Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties. When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- 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

However, for infection control reasons and in accordance with the Health Promotion and Protection Act (1990) service animals are restricted from entering food preparation and food storage areas.

In unplanned circumstances should the service animal need to be separated from its owner the staff will make a reasonable effort to assist the individual to find an alternative care provider for their service animal as per contact information provided by the individual. However, Fontbonne Ministries does not accept any liability for a service animal while on their premises.

For the safety of the service animal, the owner is to be responsible for its complete care (i.e. feeding, cleaning issues), supervision and stewardship (i.e. is kept on an appropriate lead) while on the premises. In the rare event owners may be asked to remove their service animal from the property for the following reasons:

- Disruptive/aggressive behaviour
- Property damage

Support Persons

Fontbonne Ministries welcomes any person with a disability to be accompanied by a support person while on the premises. A support person should be identified by the person with the disability and is not required to carry or produce identification, and may not require specialized training or certification.

Where a support person is accompanying a person with a disability in situations that may involve the discussion/release of confidential information (such as Personal Health Information), verbal informed consent must be obtained. Also, in some instances the support person may need to agree to the same service requirements as the person with the disability (FM policy #).

If Fontbonne Ministries hosts an event that charges admission fees, support persons may be welcome at no extra charge or a fee may be charged under the following conditions:

Public Notice of Temporary Service Disruption

In the event of a planned or unexpected disruption to services or facilities for guests with disabilities, Fontbonne Ministries will notify the persons promptly. A clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available. The notice will be made publicly available.

Training and Education

Fontbonne Ministries is committed to training all staff, volunteers, students in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities. Training includes:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards;
- our policies related to the Customer Service Standards;
- how to interact and communicate with people with various types of disabilities;
- how to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

(See <https://www.accessforward.ca/> for training materials)

Complaint and Feedback Process

Fontbonne Ministries welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns. Feedback may be provided in the following ways:

- Speaking directly with staff and management;
- Submitting written comments.

All feedback, including complaints, will be handled through the site manager. Guests can expect to hear back within 5 to 7 business days, or sooner. Efforts will be made to ensure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Integrated Accessibility Standard (IASR), Ontario Regulation 191/11, 2012

Communication Supports

Fontbonne Ministries communicates with people with disabilities in ways that take into account their disability. We will work with the person with disabilities to determine what method of communication works for them.

Accessible Information Formats and Communications Supports

Fontbonne Ministries have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. We communicate with people with disabilities in ways that take into account their disability. When asked, to the best of our ability we will provide information about our organization and its services, including safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

Accessible Website and Web Content

Fontbonne Ministries also meets internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario's accessibility laws.

Employment General Supports (recruitment, selection, communication, emergency response information, document, accommodation, return to work, performance management)

Fontbonne Ministries notify employees, job applicants and the public that accommodations can be made during recruitment and hiring.

We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. We consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee's job; and
- b) information that is generally available to employees in the workplace.

Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability. We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

Design of Public Spaces (Accessibility Standards for the Built Environment)

Fontbonne Ministries will meet accessibility laws when building or making major changes to service spaces. We put procedures in place to prevent service disruptions to the accessible parts of our public spaces.

This document available upon request.

CROSS REFERENCE FM POLICIES:

REGULATORY REFERENCE:

Health Promotion and Protection Act, 1990

Ontario Human Rights Code, R.S.O. 1990, c. H.19

Ontario Building Code Act, 1992

Food Safety and Quality Act, 2001

The Ontarians with Disabilities Act (ODA), 2001

The Accessibility for Ontarians with Disabilities Act (AODA), 2005, S.O. 2005, c.11

Accessibility Standards for Customer Service (AODA), 2008, O. Reg. 429/07

Guide to the Accessibility Standards for Customer Service, Ontario Regulation 429/07

Integrated Accessibility Standards (AODA), 2011 O. Reg. 191/11