



Section: People and Culture	Applicable to: All Employees
Procedure/Policy: POL-1.09	Approval Date: November 12, 2020
Subject: Accessibility for Ontarians with Disabilities Act	Revision Date: September 20, 2021 December 3, 2023

1.0 PURPOSE

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Employment Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of:

- (a) accessible employment services for persons with disabilities;
- (b) goods and services to the public or other third parties, not to the goods themselves;
and
- (c) information and communications services and materials for people with disabilities.

All employment, goods, services, information, and communication materials provided by Shepherds of Good Hope shall follow the principles of dignity, independence, integration and equal opportunity.

2.0 DEFINITIONS

- 2.1 Accessible Formats**– Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
- 2.2 Assistive device:** A technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that service users bring with them, such as a wheelchair, walker, or a personal oxygen tank, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.
- 2.3 Communication Supports** – Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.
- 2.4 Conversion Ready**– An electronic or digital format that facilitates conversion into an acceptable format.

2.5 Disability: As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- (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 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*.

2.6 Guide dog: A highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people who are blind.

2.7 Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

2.8 Redeployment – 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.

2.9 Service animal: A service animal for a person with a disability if:

- (a) The animal 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; or
- (b) The person provides documentation from a member of one of the following regulated health professional colleges confirming that 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;
 - 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; or

- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

2.10 Support person: In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

3.0 ESTABLISHMENT OF ACCESSIBILITY POLICIES AND PLANS

3.1 Shepherds of Good Hope will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

3.2 Shepherds of Good Hope will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

3.3 Shepherds of Good Hope will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

3.4 Shepherds of Good Hope will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement Shepherds of Good Hope's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

4.0 PROCURING OR ACQUIRING GOODS AND SERVICES OR FACILITIES

4.1 Shepherds of Good Hope will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

5.0 TRAINING REQUIREMENTS

5.1 Shepherds of Good Hope will provide training for its employees and volunteers regarding the IASR and the *Ontario Human Rights Code* as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Shepherds of Good Hope's policies, and all other persons who provide goods, services or facilities on behalf of Shepherds of Good Hope.

5.2 Training will be provided on an ongoing basis to new employees and volunteers during onboarding. Revised training will be provided in the event of changes to legislation, procedures, policies, or practices.

5.3 Regardless of the format, training will cover the following:

- (a) A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- (b) A review of the requirements of the service user service standards;
- (c) Instructions on how to interact and communicate with people with various types of disabilities;
- (d) Instructions on how to interact with people with disabilities who:
 - Use assistive devices;
 - Require the assistance of a guide dog or other service animal; or
 - Require the use of a support person (including the handling of admission fees);
 - Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
 - Instructions on what to do if a person with a disability is having difficulty accessing our services; and
 - Policies, procedures, and practices of the company pertaining to providing accessible services to service users with disabilities.

5.4 Shepherds of Good Hope will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

6.0 EMPLOYEE RECRUITMENT, ASSESSMENT AND SELECTION

6.1 Shepherds of Good Hope will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Shepherds of Good Hope will consult with the applicant and provide or arrange for suitable accommodation.

6.2 Successful applicants will be made aware of Shepherds of Good Hope's policies and supports for accommodating people with disabilities.

7.0 ACCESSIBLE FORMATS AND COMMUNICATION SUPPORTS FOR EMPLOYEES

7.1 Shepherds of Good Hope will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

7.2 If an employee with a disability requests it, Shepherds of Good Hope will provide or arrange for the provision of accessible formats and communication supports for the following:

- (a) Information needed in order to perform their job; and
- (b) Information that is generally available to all employees in the workplace.

7.3 Shepherds of Good Hope will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

8.0 WORKPLACE EMERGENCY RESPONSE INFORMATION

8.1 Where required, Shepherds of Good Hope will create individual workplace emergency response information for employees with disabilities. This information will consider the unique challenges created by the individual's disability and the physical nature of the workplace, and will be created in consultation with the employee.

8.2 This information will be reviewed when:

- (a) The employee moves to a different physical location in the organization;
- (b) The employee's overall accommodation needs or plans are reviewed; and/or
- (c) Shepherds of Good Hope reviews general emergency response policies.

9.0 DOCUMENTED INDIVIDUAL ACCOMMODATION PLANS FOR EMPLOYEES

9.1 Shepherds of Good Hope will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

9.2 Shepherds of Good Hope must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these accommodation plans should include specific elements, including:

- (a) The ways in which the employee can participate in the development of the plan;
- (b) The means by which the employee is assessed on an individual basis;
- (c) The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- (d) The ways that an employee can request the participation of a representative from their union or other representative from the workplace (if the employee is not represented by union) for the creation of the accommodation plan;
- (e) The steps taken to protect the privacy of the employee's personal information;
- (f) The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;

- (g) The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- (h) The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

9.3 The individual accommodation will also:

- (a) Include information regarding accessible formats and communication supports upon request;
- (b) Where needed, include individualized workplace emergency response information; and
- (c) Outline all other accommodation provided.

10.0 PERFORMANCE MANAGEMENT AND CAREER DEVELOPMENT

10.1 Shepherds of Good Hope will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. *Individual accommodation plans will be consulted, as required.*

11.0 RETURN TO WORK AND REDEPLOYMENT

11.1 Shepherds of Good Hope will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

11.2 The return to work process will outline the steps Shepherds of Good Hope will take to facilitate the employee's return to work and shall use documented individual accommodation plans.

11.3 The accessibility needs of employees with disabilities will be considered in the event of redeployment.

12.0 CUSTOMER SERVICE

12.1 Shepherds of Good Hope will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- (a) Ensuring that all service users receive the same value and quality;
- (b) Allowing service users with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a health and safety risk;
- (c) Using alternative methods when possible to ensure that service users with disabilities have access to the same services, in the same place and in a similar manner;

- (d) Considering individual accommodation needs when providing goods and services; and
- (e) Communicating in a manner that considers the service user's disability.

12.2 The Use of Assistive Devices

12.2.1 Service User's Own Assistive Devices

- 12.2.1.1 Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the company.
- 12.2.1.2 In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

12.2.2 Assistive Devices Provided by Shepherds of Good Hope

- 12.2.2.1 The following assistive devices are available on a first come, first served basis and upon request, to help service users access our goods and services:
 - Walkers; and
 - Wheelchairs.

12.3 Guide Dogs and Service Animals

12.3.1 A service user with a disability who is accompanied by a guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals.

12.3.2 Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

12.3.3 Food Service Areas

- 12.3.3.1 A service user with a disability who is accompanied by guide dog or service animal will be allowed access to food service areas that are open to the public unless otherwise excluded by law.
- 12.3.3.2 Other types of service animals are only permitted into areas where food is served, sold, or offered for sale due to the *Health Protection and Promotion Act*, Ontario Regulation 493/17.

12.3.4 Exclusion Guidelines

- 12.3.4.1 If a service user's guide dog or service animal is excluded by law (see applicable laws below), Shepherds of Good Hope will offer alternative methods to enable the person with a disability to access goods and services, when possible. For example, the company might accommodate a service user's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

12.3.5 Applicable Laws

- 12.3.5.1 *Dog Owners' Liability Act, 2005*: If there is a conflict between a provision of this legislation or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

12.3.6 Recognizing a Guide Dog or Service Animal

- 12.3.6.1 If it is not readily apparent that the animal is being used by the service user for reasons relating to their disability, Shepherds of Good Hope may request verification from the service user.

12.3.7 Care and Control of the Animal

- 12.3.7.1 The service user who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

12.3.8 Allergies and Other Health and Safety Concerns

- 12.3.8.1 If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Shepherds of Good Hope will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each service user's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

- 12.3.8.2 Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyze all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.
- 12.3.8.3 In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

12.4 The Use of Support Persons

- 12.4.1 If a service user with a disability is accompanied by a support person, Shepherds of Good Hope will ensure that both persons may enter the premises together and that the service user is not prevented from having access to the support person.
- 12.4.2 There may be times where seating and availability prevent the service user and support person from sitting beside each other. In these situations, the company will make every reasonable attempt to resolve the issue.
- 12.4.3 In situations where confidential information might be discussed, consent will be obtained from the service user before any potentially confidential information is mentioned.

12.5 Notice of Disruptions in Service

- 12.5.1 Service disruptions may occur for reasons that may or may not be within the control or knowledge of Shepherds of Good Hope. In the event of any temporary disruptions to facilities or services that service users with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.
- 12.5.2 If a notification needs to be posted, the following information will be included, unless it is not readily available or known:
- (a) Goods or services that are disrupted or unavailable;
 - (b) Reason for the disruption;

- (c) Anticipated duration; and
- (d) A description of alternative services or options.

12.5.3 Notification Options

- 12.5.3.1 When disruptions occur, Shepherds of Good Hope will provide notice by:
- (a) Posting notices in conspicuous places, including at the point of disruption, at the main entrance, and the nearest accessible entrance to the service disruption, or on the company website;
 - (b) Contacting service users with appointments;
 - (c) Verbally notifying service users when they make a reservation or appointment; or
 - (d) By any other method that may be reasonable under the circumstances.

13.0 INFORMATION AND COMMUNICATION

13.1 Service User Feedback

13.1.1 Shepherds of Good Hope shall provide service users with the opportunity to provide feedback on the service provided to service users with disabilities. Information about the feedback process will be readily available to all service users and notice of the process will be made available during their intake and during service user meetings. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

13.1.2 Submitting Feedback

- 13.1.2.1 Service users who wish to provide feedback by completing an onsite service user feedback form or verbally can do so to any Shepherds of Good Hope employee.

13.2 Notice of Availability and Format of Documents to Service Users

13.2.1 Shepherds of Good Hope shall notify service users that the documents related to the service user service standards are available upon request and in a format that takes into account the service user's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Shepherds of Good Hope, the website of Shepherds of Good Hope, and any other reasonable method.

13.3 Feedback Process

- 13.3.1 Shepherds of Good Hope will ensure that all feedback processes (both internal and external) are made accessible to service users/customers or employees, upon request.
- 13.3.2 Feedback can be provided in person, by phone, by email or in written form at 233 Murray Street, 613-789-8210 ext. 1300, or at reception@sghottawa.com or to any member of the management or leadership team.
- 13.3.3 Shepherds of Good Hope will endeavor to follow up with anyone providing feedback within 5 business days or as soon as possible afterward, in the manner that feedback contact information was provided (i.e. if a phone number was provided, SGH will call the person, if an email address was provided, SGH will email the person, etc.).
- 13.3.4 All feedback is appreciated and taken seriously. Any complaints will be investigated and corrective action taken when required.

13.4 Accessible Formats and Communication Supports

- 13.4.1 Unless deemed unconvertible, Shepherds of Good Hope will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.
- 13.4.2 Shepherds of Good Hope will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.
- 13.4.3 Shepherds of Good Hope will make the availability of accessible formats and communication supports publicly known.

13.5 Emergency Procedures, Plans or Public Safety Information

- 13.5.1 Shepherds of Good Hope will ensure that all publicly available safety and emergency information (e.g. evacuation procedures, floor plans etc.) is provided in an accessible format or with appropriate communication supports, upon request.

13.6 Accessible Websites and Web Content

- 13.6.1 Shepherds of Good Hope will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

13.7 Exceptions

13.7.1 The Information and Communications Standard does not apply to:

- (a) Products and product labels;
- (b) Unconvertible information or communications; or
- (c) Information that the organization does not control either directly or indirectly through a contractual relationship.

13.7.2 Unconvertible Information or Communications

13.7.2.1 If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Shepherds of Good Hope will ensure that the individual who made the request is provided with an explanation and a summary of the information.

13.7.2.2 Shepherds of Good Hope will classify information or communications as unconvertible where:

- (a) It is not technically practicable to convert; or
- (b) The technology required to make the conversion is not readily available.