



**Highland Shores**  
**CHILDREN'S AID**  
Protect Care Empower

# **Accessibility for Ontarians with Disabilities (AODA)**

## **Multi-Year Accessibility Plan**

## **I. Accessibility for Ontarians with Disabilities Act (AODA)**

In 2005, the government of Ontario passed the Accessibility for Ontarians with Disabilities Act (AODA), which requires that Ontario be an accessible province by 2025.

Accessibility standards have been created as part of the Accessibility for Ontarians with Disabilities Act. These standards are rules that businesses and organizations in Ontario need to follow to identify, remove and prevent barriers so that people with disabilities have more opportunities to participate in everyday life. The five standards are:

- Customer Service – providing good customer service, understanding that people with disabilities may have different needs.
- Information and Communication – giving people with disabilities access to information that we all depend on.
- Employment – making accessibility a regular part of recruiting, hiring and supporting employees with disabilities. Expanding Ontario’s labour pool and welcoming more people with disabilities into more workplaces.
- Transportation – making it easier for people with disabilities to travel in Ontario and get where they need to go.
- Design of Public Spaces (Built Environment) – removing barriers in public spaces and buildings making it easier for all Ontarians, including people with disabilities, to access places where they work, travel, shop and play.

The Accessibility Standard for Customer Service (Ontario Regulation 429/07) was the first standard to become law. The next four standards - Information and Communications, Employment, Transportation and Design of Public Spaces - have been combined under one regulation, the Integrated Accessibility Standards Regulation (IASR) (Ontario Regulation 191/11). The IASR requirements currently in regulation are being phased in between 2011 and 2021.

### **What is a Barrier?**

A ‘Barrier’ is anything that keeps someone with a disability from fully participating in all aspects of society because of their disability. Barriers can involve:

- Attitude – the way people think.
- Architectural / Structural – relate to design elements of a building.
- Information – difficulties in receiving or conveying information.
- Technology – technologies can prevent people from accessing information.
- Systemic – company policies and procedures can create barriers often unknowingly

## **II. Highland Shores Children’s Aid AODA Implementation**

Highland Shores Children’s Aid is committed to meeting the objectives and requirements outlined in the Accessibility for Ontarians with Disabilities Act, 2005 and the applicable regulations, and to meeting the accessibility needs of persons with disabilities in a timely manner, through the implementation of the requirements of the Act and its applicable regulations.

The Customer Services Standard was the first to be implemented and was followed by what is termed the Integrated Standard (Information and Communication, Employment, Transportation and Build Environment Standards).

Highland Shores Children's Aid Integrated Accessibility Standards Policy and Multi-Year Accessibility Plan was developed to address how Highland Shores Children's Aid achieves or will achieve accessibility through meeting the IASR's requirements. The Multi Year Accessibility Plan was developed in accordance with the IASR. It outlines a strategy to prevent and remove barriers and address the current and future requirements of the AODA. The Plan applies to all locations of Highland Shores Children's Aid and will be reviewed and updated every five years.

Highland Shores is defined in the AODA as a large not-for-profit organization and not included as a public sector employer as per Schedule 1 definitions. The requirements for the integrated standards have varying compliance deadlines ranging from January 2012 to January 2025. The following Highland Shores Children's Aid Multi-Year Accessibility Plan is created based on the requirement within the Accessibility for Ontarians with Disabilities Act, 2005 and outlines the applicable deadlines and requirements of the Society.

## Multi-Year Accessibility Plan

### Accessibility for Ontarians with Disabilities Act (AODA) Integrated Accessibility Standards

The Accessibility Plan summarizes what actions Highland Shores Children's Aid has already taken and outlines planned activities to support people with disabilities.

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 1- General Standards</b>					
Establishment of Accessibility Policies (s.3)	<ul style="list-style-type: none"> <li>Develop, implement, and maintain policies on how the organization will achieve accessibility.</li> <li>Include a statement of organizational commitment to achieve accessibility.</li> <li>Make the documents publicly available and provide them in an accessible format upon request.</li> </ul>	<ul style="list-style-type: none"> <li>Develop and communicated to all employees: "Accessibility for Ontarians with Disabilities Act (AODA) 2005: Integrated Accessibility Standards, Ontario Regulation 191/11 Policy".</li> <li>Include a statement on the HSCA website that our accessibility policies are available upon request and provided in an accessible format if required.</li> </ul>	January 1, 2014	Human Resources	Completed
				Communications (post on website)	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 1 - General Standards</b>					
Accessibility Plans (s.4)	<ul style="list-style-type: none"> <li>Establish, implement, maintain and document a multi-year accessibility plan outlining organization's strategy to prevent and remove barriers and meet the requirements of the Regulation.</li> <li>Post the accessibility plan on the organization's website and provide the plan in an accessible format upon request.</li> <li>Review and update the plan at least once every five years.</li> </ul>	<ul style="list-style-type: none"> <li>Develop plan</li> <li>Document what has been completed to date.</li> <li>Develop plan to review and update annually and more thoroughly after 5 years</li> <li>Post plan on website in accessible format and have ability to provide plan upon request in accessible format</li> </ul>	January 1, 2014	Human Resources	Completed
				Communications (post on webpage)	Completed
Training (s.7)	<ul style="list-style-type: none"> <li>Ensure training is provided to all employees, volunteers and persons who participate in developing the organization's policies and other persons who provide goods, services or facilities on behalf of the organization on the requirements of the accessibility standards and on the Human Rights Code as it relates to people with disabilities.</li> <li>Keep records of the dates when the training was offered and number of participants trained.</li> </ul>	<ul style="list-style-type: none"> <li>Develop and implemented training plan for all employees, Volunteers, foster parents and Board Members.</li> <li>Training records kept by Human Resources.</li> <li>Training provided to all new staff, volunteers and Board members and those returning from leaves.</li> </ul>	January 1, 2015	Human Resources	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 2 – Information and Communications Standard</b>  <i>This section of the Regulation includes requirements related to: feedback processes, accessible formats and communication supports, publically available emergency procedures, plans, public safety information, accessible websites and web content.</i>  The Information and Communications Standards do not apply to the following: 1. Products and product labels, except as specifically provided by this Part. 2. Unconvertible information or communications if it is not technically feasible to convert the information or communication; or the technology to convert is not readily available. 3. Information that the obligated organization does not control directly or indirectly through a contractual relationship m, except as required under section 15 and 18.					
Feedback Processes (s.11)	<ul style="list-style-type: none"> <li>Ensure processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for accessible formats and communications supports, upon request.</li> <li>Notify the public about the availability of accessible formats and communication supports with regard to receiving and responding to feedback.</li> </ul>	<ul style="list-style-type: none"> <li>Review existing feedback process and identify methods for increasing accessibility.</li> <li>Develop and implement a communication plan on this requirement to educate staff regarding receiving and responding to feedback from the public and employees.</li> <li>Include a statement on our website that accessible formats and communication supports are provided or arranged for upon request when receiving and responding to feedback.</li> </ul>	January 1, 2015	Services	Completed
				Human Resources	Completed
				Communications (post of webpage)	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 2 – Information and Communications Standard</b>					
Accessible Formats and Communication Supports (s.12)	<ul style="list-style-type: none"> <li>• Provide or arrange, upon request for the provision of accessible formats and communication supports for persons with disabilities, <ul style="list-style-type: none"> <li>○ In a timely manner.</li> <li>○ At a cost that is no more than the regular cost charged to other persons.</li> <li>○ In consultation with the person making the request in determining the accessible format or communications supports.</li> </ul> </li> <li>• Notify the public about the availability of accessible formats and communication</li> </ul>	<ul style="list-style-type: none"> <li>• Create a policy that includes procedure for provision of accessible formats and communication supports</li> <li>• Inform employees that accessibly format and communication supports must be provided when a request is made.</li> </ul>	January 1, 2016	Human Resources  Communications (post of webpage)	Completed  Completed
Emergency Procedures, Plans or Public Safety Information (s.13)	<ul style="list-style-type: none"> <li>• If an organization prepares emergency procedures, plans or public safety information and makes the information available to the public; the organization shall provide the information in an accessible format or with appropriate communication supports, as soon as practicable, upon request.</li> </ul>	<ul style="list-style-type: none"> <li>• Review emergency procedures, plans and information to determine if any are made available to the public.</li> <li>• Ensure any procedures made available to the public are available in accessible format or with appropriate communication supports.</li> </ul>	January 1, 2012	Property	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 2 – Information and Communications Standard</b>					
Accessible Websites and Web Content (s. 14)	<ul style="list-style-type: none"> <li>All new Internet websites and web content on those sites must conform with WCAG 2.0 Level A standards.</li> </ul>	<ul style="list-style-type: none"> <li>Website and content conform to guidelines.</li> </ul>	January 1, 2014	Information Management & Communications	Completed
	<ul style="list-style-type: none"> <li>All internet websites and web content conform with WCAG 2.0 Level AA (apart from live captions and pre-recorded Audio Descriptions).</li> </ul>	<ul style="list-style-type: none"> <li>Will review remaining websites for compliance status and will ensure they conform to requirements</li> </ul>	January 1, 2021	Information Management & Communications	Completed
<b>Part 3 - Employment Standards</b>					
Recruitment General (s.22)	<ul style="list-style-type: none"> <li>Notify employees and the public about the availability of accommodation for applicants with disabilities during the recruitment processes.</li> </ul>	<ul style="list-style-type: none"> <li>Include a statement on our postings and Internet career section regarding the availability of accommodation during the recruitment process.</li> </ul>	January 1, 2016	Human Resources	Completed
Recruitment, Assessment or Selection Process (s.23)	<ul style="list-style-type: none"> <li>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.</li> <li>Consult applicants 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 if an applicant requests an accommodation.</li> </ul>	<ul style="list-style-type: none"> <li>Review hiring procedures to ensure applicants are advised during telephone conversations or written communications that accommodations are provided up request</li> <li>Provide suitable accommodations upon request throughout all stages of job competition process</li> </ul>	January 1, 2016	Human Resources	Completed
Notice to Successful Applicants (s.24)	<ul style="list-style-type: none"> <li>When making offers of employment, notify successful applicants of its policies for accommodating employees with disabilities.</li> </ul>	<ul style="list-style-type: none"> <li>Add statement to offer letter</li> </ul>	January 1, 2016	Human Resources	Completed



Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 3 - Employment Standards</b>					
Informing Employees of Supports (s.25)	<ul style="list-style-type: none"> <li>• Inform employees of the employer's 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.</li> <li>• Provide information to employees whenever there is a change to existing policies on the provision of job accommodations that takes into account an employee's accessibility needs due to disability.</li> </ul>	<ul style="list-style-type: none"> <li>• Review all Human Resources policies to determine whether they are compliant with the AODA legislations and standards.</li> <li>• Policies will be developed or revised as necessary</li> <li>• Revise orientation</li> <li>• Inform employee of revisions to policies.</li> </ul>	January 1, 2016	Human Resources	Completed
Accessible Formats and Communication Supports for Employees (s.26)	<ul style="list-style-type: none"> <li>• Upon request by an employee, the employer shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for: <ul style="list-style-type: none"> <li>○ information needed to perform the employee's job; and</li> <li>○ information that is generally available to employees in the workplace.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Inform employees that accessible formats and communication supports will be provided upon request</li> </ul>	January 1, 2016	Human Resources	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 3 – Employment Standards</b>					
Workplace Emergency Response Information (s.27)	<ul style="list-style-type: none"> <li>The employer 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 the employer is aware of the need for accommodation due to the employee’s disability.</li> <li>If an employee receives individualized workplace emergency response information and requires assistance, with the employee’s consent, the employer shall provide the workplace emergency response information designated by the employer to provide assistance to the employee.</li> <li>The employer shall provide information required under this section as soon as practicable after the employer becomes aware of the need for accommodation due to an employee’s disability.</li> <li>The employer shall review the individualized workplace emergency response information: <ul style="list-style-type: none"> <li>when the employee moves to a different location in the organization,</li> <li>when the employee’s accommodations needs/plans are reviewed or are changed; and</li> <li>when the employer reviews its general emergency response plans and policies.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Develop and communicate to employees: “Workplace Emergency Response Information for Employees with Disabilities Procedure”.</li> <li>Procedure included in new hire orientation.</li> </ul>	January 1, 2012	Human Resources	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 3 – Employment Standards</b>					
Documented Individual Accommodation Plans (s.28)	<ul style="list-style-type: none"> <li>Develop a written process for the development of documented individual accommodation plans for employees with disabilities.</li> <li>Individual accommodation plans for employees will include:               <ol style="list-style-type: none"> <li>The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.</li> <li>The means by which the employee is assessed on an individual basis.</li> <li>The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.</li> <li>The manner in which the employee can request participation of union representative or other representative (if non- unionized) in the development of an accommodation plan.</li> <li>The steps to protect the privacy of the employee's personal information.</li> <li>The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</li> <li>If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</li> <li>The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.</li> </ol> </li> </ul>	<ul style="list-style-type: none"> <li>Review existing accommodation process and revise as necessary to include the AODA requirements. (items 1-8)</li> <li>Update procedures in writing.</li> <li>Consider tools guide process and create consistency, i.e. template.</li> </ul>	January 1, 2016	Human Resources	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 3 – Employment Standards</b>					
Documented Individual Accommodation Plans (s.28) (cont'd)	<p>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>	<ul style="list-style-type: none"> <li>Review existing accommodation process and revise as necessary to include the AODA requirements. (items 1-8)</li> <li>Update procedures in writing.</li> <li>Consider tools guide process and create consistency, i.e. template.</li> </ul>			Completed
Return to Work Process (s. 29)	<ul style="list-style-type: none"> <li>Develop and have in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodation in order to return to work; and document the process.</li> <li>The return to work process will: <ul style="list-style-type: none"> <li>Outline the steps the employer will take to facilitate the return to work of employees; and</li> <li>Use documented accommodation plans (as described in Section 28) as part of the process.</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Review RTW policy and process and incorporate the AODO requirements into the policy, process and accommodation plans.</li> </ul>	January 1, 2016	Human Resources	Completed
		NOTE: The Return to Work Process does not replace or override any other return to work process created by or under any other statute.			

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 3 – Employment Standards</b>					
Performance Management (s.30)	<ul style="list-style-type: none"> <li>Take into account the accessibility needs of employees with disabilities when administering performance management processes, as well as individual accommodation plans.</li> </ul>	<ul style="list-style-type: none"> <li>Review policy to incorporate AODA requirements.</li> <li>Determine impact for both performance management and performance reviews</li> <li>Consider training/tools/needs for manager to best supervise staff with disabilities.</li> </ul>	January 1, 2016	Human Resources	Completed
Career Development and Advancement (s.31)	<ul style="list-style-type: none"> <li>Take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans where the employer provides career development and advancement to its employees.</li> </ul>	<ul style="list-style-type: none"> <li>Review career advancement policies and procedures and revise as necessary to incorporate AODA requirements</li> </ul>	January 1, 2016	Human Resources	Completed
Redeployment (s.32)	<ul style="list-style-type: none"> <li>Take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when deploying employees with disabilities where the employer uses redeployment processes.</li> </ul>	<ul style="list-style-type: none"> <li>Review redeployment policies and procedures and revise as necessary to incorporate AODA requirements</li> </ul>	January 1, 2016	Human Resources	Completed

Section	Standard Description	Action	Compliance Date	Responsibility	Status
<b>Part 4.1 - Design of Public Spaces Standard (Accessibility Standards for the Built Environment)</b>  <i>This section of the regulations includes requirements related to: outdoor play spaces, exterior paths of travel, accessible parking, obtaining services, (service counters, fixed queuing guides, waiting areas) and maintenance of accessible elements,</i>					
	<ul style="list-style-type: none"> <li>• Ensure that public spaces that are newly constructed or redeveloped on or after January 1, 2017 must comply with Part 4.1 of the Integrated Accessibility Standard.</li> <li>• Public Spaces include, paths of travel, outdoor public use eating areas, outdoor play spaces, service counters, accessible parking etc.</li> <li>• Enhancements to accessibility in building will happen at a later date though Ontario's Building Code.</li> <li>• Off street parking must provide comply with the AODA requirements (S. 80.34)</li> <li>• Ensure requirements are met when building new or replacing existing service counters; installing new fixed queuing guides' and building new or making planned significant alternation to existing waiting areas.</li> <li>• Ensure procedures are in place for preventative and emergency maintenance of the accessible elements in public spaces as required under AODA.</li> <li>• Ensure procedure are in place for handling temporary disruptions when an accessible part of the organization's public spaces is not useable, such as putting up a sign explaining the disruption and outlining an alternative.</li> </ul>		January 1, 2017	Property	Ongoing as required

