



AODA – Integrated Accessibility Standards Regulation (IASR) Policies

POLICY NAME	AODA – Integrated Accessibility Standards Regulation (IASR) Policies
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REFERENCES	<i>Accessibility for Ontarians with Disabilities Act, 2005 (AODA). O. Reg. 191/11 Integrated Accessibility Standards (IASR) Feedback Policy, Ottawa Salus Multi-year Accessibility Plan, Ottawa Salus Attendance, Return To Work & Employment Accommodation Policies, Ottawa Salus O. Reg. 58, Blind Persons’ Rights Act</i>

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Policy Statement – Commitment to Accessibility

As a provider of supportive housing, Ottawa Salus is committed to ensuring a safe, dignified, and welcoming environment for everyone who has a physical or mental health disability. With a focus on supporting our client /tenant's recovery and ongoing wellness we provide accessible environments for all stakeholders, including our clients, employees, job applicants, and any visitors who may enter our public premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, and its associated regulations.

We ensure our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. We will review these policies and practices annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, we will strive to meet the needs of individuals with disabilities in a timely and effective manner.

Providing an accessible environment is a shared effort, and we are committed as an organization to working with the necessary parties to make accessibility for all a reality.

*For detailed information on our accessibility policies, plans, and training programs, please submit requests to hr@salusottawa.org or by calling 613-729-0123. Versions of communications in accessible formats will be made available upon request within a reasonable time period in a mutually agreed upon format, that our organization has access to.



Signature of the Executive Director

Purpose

The purpose of this policy is to provide guidelines for the provision of accessible information and communications, customer service, public spaces, and employment standards for persons with disabilities, in accordance with O. Reg. 191/11 *Integrated Accessibility Standards (IASR)* under the *Accessibility for Ontarians with Disabilities Act, 2005*.

All services and programs provided by Ottawa Salus will follow the guiding principles of dignity, independence, integration, and equal opportunity.

Definitions

Accessible formats: Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.

Assistive devices: 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 devices that clients 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.

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.

Conversion-ready: An electronic or digital format that facilitates conversion into an acceptable format.

Disability: As defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, includes but is not limited to: a mental impairment, developmental disability, learning disability, mental disorder, physical disability, infirmity, malformation, or disfigurement that is caused by bodily injury, birth defect, or illness.

Exterior Paths of Travel: Refers to sidewalks and walkways designed and constructed for public pedestrian travel and intended to provide a functional route from Point A to Point B.

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.

Redeveloped: Refers to a planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

Service animal: A certified animal for a person with a disability where: (1) The animal can be readily identified as being used for disability purposes, as a result of visual indicators such as the vest or harness worn by the animal; and (2) The person provides documentation from a member of a regulated health professional college confirming that the animal is required for disability reasons

*Emotional support animals are not permitted unless Salus is provided with satisfactory documentation from a certified healthcare professional indicating that the animal is required for disability reasons.

Support person: Someone who accompanies a person with a disability to help with communication, mobility, personal care, medical needs, or access to goods and services.

Responsibilities

Executive Director and Human Resources

- The Executive Director and Human Resources (HR) are responsible for ensuring this Policy is reviewed annually, along with the multi-year accessibility plan.
- HR shall recommend amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.
- HR shall provide advice and direction on the implementation of this Policy.

Management

- Managers shall ensure that they and their staff, student interns and volunteers are familiar with this Policy and that they are in adherence.
- Managers and HR shall ensure staff receive the appropriate AODA training and receive the necessary tools to provide services in an accessible format (that is available or can be reasonably accommodated).
- Managers are expected to make note of any accessibility barriers within their programs and contribute to the development of the multi-year accessibility plan.
- Managers are also expected to be well versed in Salus' AODA, Feedback, and 'Attendance, Return to Work & Employment Accommodation' policies.

Employees, Student Interns, Volunteers and Contractors

- Employees, Student Interns, and Volunteers must participate in the required Accessibility training and review this policy.
- Contractors or anyone providing services on behalf of Salus must demonstrate completion of the required Accessibility training.
- When communicating with a person with a disability, they shall do so in a manner that respects the person's disability.
- When providing service, they shall:
 - Adhere to this policy.
 - Follow the principles of dignity, independence, integration, and equal opportunity.

- Ensure disabled clients and the general public are aware of the accessibility related accommodations available upon request.
- Staff shall bring forward any accessibility concerns raised by persons with disabilities as per Salus' Feedback policy (*Human Resources Policies s.5.13*).

Part I – General Requirements

Intent

The following general requirements apply to the five standards: information and communications, employment, transportation, design of public spaces, and customer service. Ottawa Salus will develop, implement, and maintain policies governing how it will achieve accessibility through the general requirements listed below.

Establishment of Accessibility Policies and Plans

Ottawa Salus 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.

Salus 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.

Ottawa Salus will review and update its accessibility plan once every five years and will establish, review, and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Status reports will be reviewed annually will report on the progress of the steps taken to implement Ottawa Salus' accessibility plan. This status report will be posted on our website. If requested, the report will be provided in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

Salus will incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities. The only exception is when it places undue hardship on the organization.

Training Requirements

Ottawa Salus will provide training on the IASR accessibility requirements and Ontario's *Human Rights Code* as they pertain to individuals with disabilities. This applies to all employees, volunteers, individuals who participate in developing Ottawa Salus policies, and all other persons who provide goods, services, or facilities on Salus' behalf. Training will be provided as soon as is reasonably practicable, but no later than 1 month from the new hire's start date. Training will be provided regularly to new employees and as changes to Ottawa Salus accessibility policies occur. Training will include:

- An overview of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- Ottawa Salus' AODA policy.
- 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.
- How to use Salus owned equipment that may help with providing programs or services to people with disabilities (e.g. TTY, elevator call button, etc...).
- What to do if a person with a disability is having difficulty in accessing Ottawa Salus' services.

Staff will be consulted and trained when changes are made to Salus' AODA policies and procedures.

Contractors and consultants providing services on behalf of Ottawa Salus to tenants/clients or members of the public will be required to ensure their staff have the appropriate training and confirm in writing the same to Ottawa Salus.

Records

Salus will maintain records on the training provided, when it was provided, and those who were trained.

Part II – Information and Communications Standards Policy

Intent

The following applies to the provision of accessible information and communications materials for persons with disabilities. Salus is committed to ensuring that versions of communications in accessible formats are made available upon request within a reasonable time period.

Feedback Process

Ottawa Salus will ensure that all feedback processes, both internal and external, are made accessible to clients, visitors and employees upon request. In accordance with the customer service standards, Salus will make known the availability of accessible feedback formats.

Feedback about how services and programs are delivered to people with disabilities shall be invited, forwarded to the appropriate personnel, responded to, documented and tracked. Feedback shall be collected by phone at 613-729-0123, by TTY at 613-759-8455, by e-mail (email@salusottawa.org), by the "Contact Us" web form on the Salus website (www.salusottawa.org) and in writing or in person at any Salus' staffed location. Complaints will be addressed according to Salus' feedback/complaint policy and procedures.

For more information, please see Salus' Feedback Policy (*Human Resources Policies s.5.13*).

Accessible Formats and Communication Supports

Unless deemed unconvertible, Ottawa Salus will 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, at no additional cost to the individual.

Salus will account for the person's accessibility needs when customizing individual requests and will consult with the individual making the request to ensure suitability. Salus will make the availability of accessible formats and communication supports publicly known.

Emergency Procedures, Plans or Public Safety Information

Ottawa Salus will ensure that all publicly available safety and emergency information, such as evacuation procedures and floor plans, are posted in conspicuous places on the premises, and are provided in an accessible format or with appropriate communication supports upon request.

Accessible Websites and Web Content

Salus will ensure that our website and web content conform to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR.

Exceptions

The Information and Communications Standards do not apply to:

- Products and product labels;
- Unconvertible information or communications; or

- Information that the organization does not control either directly or indirectly through a contractual relationship.

Unconvertible Information or Communications

If it is determined in consultation with the requesting party that information or communications are unconvertible, Salus will ensure that the individual who made the request is provided with an explanation and a summary of the information. Information or communications are classified as unconvertible where – It is not technically practicable to convert; or the technology required to make the conversion is not readily available.

Part III – Employment Standards Policy

Intent

This policy applies to the provision of accessible employment services for persons with disabilities regardless whether at the start of during the course of their employment. All employment services provided by Ottawa Salus will follow the principles of dignity, independence, integration, and equal opportunity.

Recruitment, Assessment, and Selection

Ottawa Salus 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 during the pre-screening and interview processes. Where a request is made, Salus will consult with the applicant and arrange for suitable accommodation.

Accessible Formats and Communication Supports for Employees

Ottawa Salus will ensure that all employees are made aware of our policies for employees with disabilities and any changes to these policies as they occur. If an employee with a disability requests it, Salus will provide or arrange for the provision of accessible formats and communication supports for the following:

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

The employee will be consulted to determine the appropriate format or support needed.

Workplace Emergency Response Information

Where required, Ottawa Salus will create individual workplace emergency response information for employees with disabilities. This information will account for 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.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; or
- Ottawa Salus reviews general emergency response policies.

Documented Individual Accommodation Plans

Ottawa Salus has developed written processes for documenting individual accommodation plans for employees with disabilities. Each accommodation plan is developed in accordance with the following principles:

- Employees are expected to participate in the development of the plan;
- Each accommodation request is assessed on an individual basis;
- For medical conditions, employees are expected to submit supporting documentation such as a Functional Abilities/Restrictions Form completed by their physician. (As required, Salus reimburses employees for properly completed forms);

- At the employee's request, a union representative may participate in the process;
- Any personal information obtained during the process is treated with confidentiality;
- Where applicable, accommodation plans shall have regular review dates built in;
- Denials of accommodation requests are provided to the employee in writing, within a reasonable time period, detailing the reasons for denial and the next steps, if any.

The individual accommodation plan will also:

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

Return to Work

Ottawa Salus will develop and implement return-to-work plans for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work.

For more information, please see Salus' *Attendance, Return to Work & Employment Accommodation Policies (Human Resources Policies s.3.4)*.

Performance Management, Career Development and Advancement

Ottawa Salus 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.

Part IV.1 – Design of Public Spaces Policy

***Note: This section applies to Salus properties open to the public.**

Intent

This policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Design of Public Spaces Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to removing barriers in two (2) areas: Buildings and Public spaces.

Exterior Paths of Travel

To ensure the health and safety of all pedestrians, any newly constructed or redeveloped exterior paths of travel will meet, and where possible exceed, the technical requirements of the *Integrated Accessibility Standards*, [section 80.23](#), and where applicable, sections 80.24 – 80.28.

Consultation on Rest Areas: Prior to constructing or redeveloping rest areas on exterior paths of travel, Ottawa Salus shall consult on the needs of children and caregivers with disabilities with the public and persons with disabilities.

Off-Street Accessible Public Parking

Types of Spaces and Access Aisles: Ottawa Salus will ensure that any newly constructed or redeveloped off-street parking facilities for public use provide the following two (2) types of parking spaces available for persons with disabilities:

- Type A – Parking space with a minimum width of 3.4 m; and
- Type B – Standard parking space with a minimum width of 2.4 mm.

Access aisles will be provided for all accessible parking spaces and will meet the requirements of the *Integrated Accessibility Standards*, [section 80.35](#).

Minimums: Salus will ensure that any newly constructed or redeveloped off-street public parking facility meets, and where possible exceeds, the required number of accessible parking spaces

based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the *Integrated Accessibility Standards*, [section 80.36](#).

Signage: Salus will ensure that the proper signage is provided for each accessible public parking space. Type A parking spaces will have signage indicating van accessibility.

Accessing Services

Service Counters: When constructing or replacing any service counters, Ottawa Salus will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, [section 80.41](#).

Fixed Queuing Guides: When constructing new fixed queuing guides, Salus will ensure that they are made accessible to people with various disabilities in accordance with the *Integrated Accessibility Standards*, [section 80.42](#).

Waiting Areas: When constructing or redeveloping an existing waiting area, Ottawa Salus will ensure that a minimum of 3% of the seating is made accessible (including at least one (1) accessible seat).

Maintenance

Ottawa Salus shall ensure that our multi-year accessibility plan addresses:

- Preventive and emergency maintenance procedures for the accessible elements in public spaces; and
- Procedures for temporary disruptions to accessible elements.

Exceptions

There may be times where it is not possible for Ottawa Salus to meet all technical requirements as outlined within legislation. In these instances, Salus will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

Part IV.2 – Customer Service Standards Policy

Intent

All programs and services provided by Ottawa Salus will follow the principles of dignity, independence, integration, and equal opportunity.

The objective of this Policy is to provide guidelines for the delivery of Salus services to persons with disabilities, in compliance with the customer service standards set out in the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

The Provision of Services to Persons with Disabilities

Ottawa Salus 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:

- Ensuring that all clients receive the same value and quality;
- Allowing clients with disabilities to do things in their own ways, at their own pace when accessing programs/ services, as long as this does not present a health and safety risk;
- Using alternative methods when possible to ensure that clients with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual accommodation needs when providing programs and services; and
- Communicating in a manner that takes into account the person with a disability.

The Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing programs or services provided by our organization. Salus shall accommodate the use of these devices, and will ensure that employees, student interns and volunteers are trained and familiar with the various assistive devices that may be used by persons with disabilities.

In cases where the assistive device presents a health and safety concern or where accessibility may be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship. (For example, where elevators are not present and where a client requires assistive devices for the purposes of mobility, Salus will make an effort to provide service in a location that accommodates the needs of the client).

Guide Dogs and Service Animals

A client with a disability accompanied by a guide dog or service animal will be welcomed at Salus unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals. 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.

Exclusion Guidelines: If a client's guide dog or service animal is excluded by law (Ex. *Health Protection and Promotion Act, Ontario Regulation 493/17, Food Safety and Quality Act, 2001, Ontario Regulation 31/05, Dog Owners' Liability Act, 2005*) Ottawa Salus will offer alternative methods to enable the person with a disability to access goods and services, when possible.

Recognizing a Guide Dog or Service Animal: If it is not readily apparent that the animal is being used by the client for reasons relating to their disability, Salus may request verification.

Care and Control of the Animal: The client who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times. As a courtesy, if the service animal has been on the premises for a long time, staff may ask whether the animal requires water, or may designate an area in which the service animal can relieve itself.

Allergies and Other Health and Safety Concerns: If a health and safety concern presents itself, for example, in the form of a severe allergy, or aggressive animal, Salus will make reasonable efforts to meet the needs of, and protect all individuals. Pursuant to Salus' obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each client's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

For additional information see Salus' policy on the *Participation of Animals in Salus Events and Activities (Human Resources Policies s5.19)*.

The Use of Support Persons

If a support person accompanies a client with a disability, Ottawa Salus will ensure that both persons may enter the premises together and that the client is not prevented from having access to the support person. If seating availability prevents the client and support person from sitting beside each other, Salus will make every reasonable attempt to resolve the issue. In situations where confidential information may be discussed, client consent will be obtained.

Admission Fees: For any event or function, Salus will not charge an admission fee in connection with a support person's presence accompanying a person with a disability.

at an, Salus shall not charge the support person

Notice of temporary disruption

In the event that there is a temporary disruption in the availability of facilities, programs or services used by persons with disabilities (e.g., temporary loss of elevator service at head office), Salus shall give notice to the public of the reason for the disruption. This notice shall include the date(s) of disruption, its anticipated duration and a description of alternative facilities, programs or services, if any, that are available. Such notice may be provided by a variety of methods, depending on the circumstances, and may include bilingual postings in conspicuous places at the affected premises, other Salus locations, as well as by other means that will ensure that the notice reaches those persons potentially affected by the temporary disruption.

Client Feedback

Salus welcomes feedback about how services is delivered to people with disabilities. All feedback received shall be formally acknowledged, documented, tracked, and responded to. As per the *Feedback Process* described in Salus' *Information and Communications Standards Policy*: Feedback shall be collected by phone at 613-729-0123, by TTY at 613-759-8455, by e-mail (email@salusottawa.org), by the "Contact Us" web form on the Salus website (www.salusottawa.org) and in writing or in person at any Salus' staffed location.

Review

These policies will be reviewed regularly to ensure that it reflects Ottawa Salus' current practices and legislative requirements.

Acknowledgement and Agreement

I, acknowledge that I have read and understand the AODA – *Integrated Accessibility Standards Regulation* (IASR) Policies of Ottawa Salus. I agree to adhere to this policy and I understand that if I violate the rules set forth in this policy, I may face corrective action up to and including termination of employment.

Name: _____

Signature: _____

Date: _____