



Hamilton-Halton

**BGC HAMILTON-HALTON
ACCESSIBILITY POLICY**

Accessible formats and communication supports are available upon request.

C: HUMAN RESOURCES: HR POLICIES	
<i>Approval Date</i> 2019	<i>Replacing</i> Parts of 4.21
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<i>Contact Person/Department</i> Executive Director	<i>Identification</i> C1 - 3106

3106 – Accessibility Policy

REFERENCE: HIGH FIVE Policy # 1.6.1

AODA [Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11](#)
IASR [Integrated Accessibility Standards, O. Reg. 191/11](#)
[Human Rights Code, R.S.O. 1990, c. H.19](#)

POLICY

The Club is committed to building a community that is inclusive for all individuals, and ensuring that its services, supports, and spaces are accessible for persons with disabilities to be successful.

PURPOSE

The long-term goal of the AODA legislation is a barrier-free Ontario for people with disabilities by 2025 through the development and implementation of accessibility standards for the private and public sectors. The Customer Service Standard was the first accessibility standard to become law as a regulation. Several accessibility standards are now contained in one regulation called the Integrated Accessibility Standards Regulation (IASR).

This policy complies with AODA including Accessible Standards for Customer Service Regulation and Integrated Accessibility Standards Regulations (IASR). The goal is to create a community that is inclusive of all persons and equitably supports all members. In creating such a community, we aim to foster a climate of understanding and mutual respect for the dignity and worth of all persons with the goal to become a barrier-free environment.

PROCEDURE

This policy applies to all employees, volunteers, and to any individual or organization (third party) that provides goods, services, programs or facilities or other third parties on behalf of the Club in accordance with AODA legislation.

Principles

The Clubs Core Values align with AODA and the plan. Core Vales include belonging, respect, encouragement, and support, working together and speaking out.

The Club is committed to being responsive to the needs of everyone who works, participant and/ or utilize the Club. To do this, we recognize the diverse needs of each individual and respond by striving to provide services and facilities that are accessible. The Club promotes accessibility through the development of policies, procedures, and practices that address integration, independence, dignity and equal opportunity.

- **Independence:** All individuals, including those with disabilities, will be able to access goods and services, to the greatest extent possible, free from assistance.
- **Dignity:** All individuals, including those with disabilities, will be treated with respect and worthiness.
- **Integration:** People with disabilities are allowed to fully benefit from the same services, in the same place and in the same or similar way as other individuals. Alternative measures might be necessary because a person with a disability requires it or because another option cannot be provided at the time. If the Club is unable to remove a barrier to accessibility, we will consider what else can be done to provide goods and services to people with disabilities.
- **Equal Opportunity:** All individuals, including those with disabilities, will have the same chances and options in the way they obtain and benefit from the goods or services provided.

Multi-Year Accessibility (Plan)

A Multi-Year Accessibility (Plan) is posted on the website and is available in accessible format and with communication supports upon request. The plan will be reviewed and, if necessary, updated at least once every five years. Status reports will be completed and posted as required.

Accessible Formats and Communication Supports

The Club are communicated to the public regarding the availability of accessible formats and communication supports, upon request, and in consultation with the person making the request, provide or arrange to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports will be provided in a timely manner, taking into account the person's particular accessibility needs and at a cost that is no more than the regular cost charged to other persons.

This requirement applies to information, communications, documents and emergency procedures, plans or safety information made available to the public.

This requirement does not apply to products and product labels, unconvertible information and communications, and information that the Club does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the Club will provide the person

requesting the information or communication with an explanation as to why the information or communications are unconvertible; and, a summary of the unconvertible information or communications.

A link will be placed on the website to the Accessible Formats and Communication Supports Request Form ([Appendix T](#)).

Signage at the Club's office will advise the availability of accessible formats and communication supports.

The line "Accessible formats and communication supports are available, upon request" is to be placed at the bottom of the front page of

- all Board and Committee agenda and minutes;
- all documentation available for public consultation; and
- anywhere else the Club determines that notification is reasonable.

Procurement of Goods, Services, Facilities and Self-Service Kiosks

Accessibility criteria and features will be incorporated when procuring or acquiring goods, services or facilities. When impractical to do so a letter outlining why this is not possible will be provided.

Self-Serve Kiosks

Accessibility features are incorporated if designing, procuring or acquiring self-service kiosks.

Training

Training is provided for its employees and volunteers regarding the IASR, which must also include training on the Ontario Human Rights Code. Training will be provided for all employees who are responsible for developing policies, and all other third parties who provide goods, services or facilities on behalf of the Club. Ongoing training is provided as changes occur within the legislation.

Training modules are courtesy of the [Ontario Human Rights Commission \(Working Together: The Code and the AODA\) © Queen's Printer for Ontario, 2015](#) and [AccessForward](#).

This training includes:

- A review of the purposes of the AODA and the requirements of the *Integrated Accessibility Standards Regulation IASR (Ontario Regulation 191/11)* and instruction about the following matters:
- How to interact and communicate with persons with various types of disability;
- How to interact with persons with disabilities who use assistive devices or require the assistance of guide dogs or other service animals or the assistance of support persons;

- How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability;
- What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services; and,
- A review of the requirements of other accessibility standards referred to in the *AODA Integrated Accessibility Standards* and the *Human Rights Code* as it pertains to persons with disabilities.

Training aligns with the duties of the employee, volunteer or third party. Training takes place as soon as is practicable. A verification of completion form is placed in the employee/ volunteers HR file and recorded.

Feedback

Feedback on how goods, services and programs are provided to people with disabilities is available at the Clubs Head Office, online and at other registration sites such as the Licensed Childcare centres. The Club communicates that alternate formats of the feedback processes are available upon request. Completed feedback forms are delivered to the Clubs Executive Director.

Customer Service Standards - Assistive Devices, Service Animals and Support Persons

Employees, volunteers and third-party contractors will accommodate the use of personal assistive devices including, but not limited to, wheelchairs, canes, walkers, scooters and Braille display boards.

Persons with disabilities, accompanied by a guide dog or other service animal and accessing goods, services or facilities offered by the Club or other third parties will be permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises. For example, in food preparation areas as prohibited by Food Premises, R.R.O. 1990, Reg. 562 under the Health Protection and Promotion Act, R.S.O. 1990, c. H.7.

If a service animal is excluded by law from the premises, BGCHH will ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the provider's goods, services or facilities.

An animal is a service animal for a person with a disability if:

- 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
- The person provides documentation from a regulated health professional, described in Section 80.45 (4) of the IASR, confirming that the person requires the animal for reasons relating to the disability.

If a support person accompanies a person with a disability, both persons will be permitted to enter the premises together and the person with a disability is not prevented from having access to the support person while on the premises. Support persons interacting with program participants are required to go through the volunteer / 3rd party screening process.

Notice of Service Disruption

Persons with disabilities often make special arrangements in order to access our goods and services. The Club will provide notice of service disruptions when any facility, technology, or service that a person with a disability usually uses to access our goods and services is temporarily unavailable or is expected to be temporarily unavailable in the near future.

Reasonable efforts will be made to provide notice of the disruption to the public, including

- information about the reason for the disruption;
- its anticipated duration;
- a description of alternative facilities or services, if any, that may be available.

If it is a planned service disruption a least 2 days prior notice will be given about the disruption. Notices are provided by a variety of methods, depending on the circumstances. They may include postings in conspicuous places at the affected premises, and on the website. Refer to [Appendix U](#) Service Disruption Template.

Information and Communication Supports Standards Communication

When communicating with a person with a disability, employees, volunteers and third parties will do so in a manner that takes into account the person's disability ensuring the best possible customer service. Two-way communication is encouraged with all persons interacting with the organization to ensure the need for accommodation or assistance is met. Training is offered for employees and volunteers in how to interact and communicate with others guided by the principle of dignity, independence and equality. Persons who identify themselves as requiring alternative communication formats are offered alternative communication in a format that meets their needs as promptly as is feasible. This may include, but is not limited to, documents that are provided in alternative formats that meet the needs of the person in a timely manner or alternative sources to telephone communications if requested or required.

Accessible Websites and Web Content

Website third party web hosting will ensure the site conforms to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, at Level A and AA in accordance with the schedule set out in the *AODA Integrated Accessibility Standards*. An annual letter of verification is requested from the website host to confirm compliance.

Employment Standards Recruitment

BGCHH will post information about the availability of accommodations for applicants with disabilities in its recruitment process. Job applicants who are individually selected for an interview and/or testing will be notified that accommodations for material to be used in the process are available, upon request. BGCHH will consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability. Successful applicants will be notified about policies for accommodating employees with disabilities as part of their offer of employment.

Employee Accommodations

BGCHH will inform employees of their right to request accommodations due to disability and will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to policies that take into account an employee's accessibility needs due to disability.

Accessible Formats and Communication Supports for Employee

Upon an employee's request, the Club will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job; and information that is generally available to employees in the workplace.

Workplace Emergency Response Information

If an employee's disability is such that workplace emergency response information is necessary tailored workplace emergency response plans and information will be provided to employees with disabilities, upon request. In addition, this information will be provided, with the employee's consent, to the person designated to provide assistance. The information will be reviewed when the employee moves to a different location, and/ or the employee's overall accommodation needs, or plans change.

Documented Individual Accommodation Plans

A written process for the development and maintenance of documented individual accommodation plans will be developed for employees with disabilities. If requested, these plans will include information regarding accessible formats and communication supports and individualized workplace emergency response information.

The process for the development of these accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee 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;
- The steps taken to protect the privacy of the employee's personal information;

- The frequency with which the individual accommodation plan should be reviewed or updated determined, and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility need.

Return to Work Process

A return to work process will be in place for employees who are absent from work due to a disability-related issue. The return to work process must include an outline of the steps taken to facilitate the employee's return to work and use documented individual accommodation plans. Redeployment processes will take into account the accessibility needs of employees with disabilities. (Refer to Return to Work Policy [C1-3110](#))

Performance Management, Career Development and Redeployment

The Club will take into account the accessibility needs of its employees and volunteers with disabilities as well as any individual accommodation plans when providing career and training development, conducting performance management and considering redeployment.

Transportation Standards

Transportation services are reviewed each year during the program planning and budget process. Currently, the Clubs transportation fleet does not have a wheelchair accessible vehicle but strives to work with partners to provide accessible transportation services upon request.

Design of Public Spaces Standards

The Club is committed to complying with the Ontario Regulation 368/13 Amendment to Building Code Accessibility requirements, which began on January 1, 2015 and AODA Design of Public Spaces Standards (including consultation requirements, when undertaking new construction and redevelopment of public spaces) in the following areas:

- Recreational trails and beach access routes;
- Outdoor public use eating areas;
- Outdoor play spaces;
- Exterior paths of travel;
- Accessible parking;
- Obtaining services; and,
- Maintenance of accessible elements.

Responsibilities

Supervisors and managers will ensure that they and their employees are familiar with and comply with this policy.

Definitions

Accessible Formats: May include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats.

Communication Supports: May include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability: Defined as per Section 2 of the Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11 and the Human Rights Code, R.S.O. 1990, c. H.19, as follows:

“Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,

A condition of mental impairment or a developmental disability,

A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

A mental disorder, or

An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.”

Kiosk: An interactive electronic terminal, including a point-of-sale device, intended for public use that allows users to access one or more services or products or both.

Service Animals: As per Section 80.45(4) of the IASR:

“An animal is 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 one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:*
 - i. A member of the College of Audiologists and Speech-Language Pathologists of Ontario.*
 - ii. A member of the College of Chiropractors of Ontario.*
 - iii. A member of the College of Nurses of Ontario.*
 - iv. A member of the College of Occupational Therapists of Ontario.*

- v. *A member of the College of Optometrists of Ontario.*
- vi. *A member of the College of Physicians and Surgeons of Ontario.*
- vii. *A member of the College of Physiotherapists of Ontario.*
- viii. *A member of the College of Psychologists of Ontario.*
- ix. *A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario. (O. Reg. 165/16, s. 16)."*

Support Person: As per Section 80.4(3) of the IASR: *"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."*

Unconvertible: Information or communications are unconvertible if it is not technically feasible to convert the information or communications, or the technology to convert the information or communications is not readily available.

