



The multi-year accessibility plan outlines the policies and actions that Niagara Support Services (NSS) and Niagara Training & Employment Agency (NTEC) have put in place to improve opportunities and remove barriers for people with disabilities.

## **Statement of Commitment**

NSS and NTEC are committed to treating people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act 2005 (AODA).

The Accessibility for Ontarians with Disabilities Act 2005 (AODA) and the Integrated Accessibility Standards Regulation (IASR) consist of the following standards that have been established as regulations:

1. Customer Service Standard
2. Information and Communication Standard
3. Employment Standard
4. Transportation Standard
5. Design of Public Spaces Standard
6. Preventative and Emergency Maintenance of Accessible Elements in Public Spaces

## **General Requirements**

### **Accessibility Policies**

NSS and NTEC have taken the following steps to ensure that accessibility policies are developed, implemented and maintained.

- The AODA (Accessibility) policy addresses the AODA in its entirety.
- All new hires and volunteers read and sign off during their orientation period.

### **Accessibility Plan**

NSS and NTEC have taken the following steps to ensure a multi-year accessibility plan is developed, implemented and reviewed at least once every five (5) years:

- The approved plan will be posted on the website.
- Accessible formats will be available upon request.

### **Training**

NSS and NTEC provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will



be provided in a way that best suits the duties of employees, volunteers and other staff members.

NSS and NTEC have taken the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws:

- All staff are trained annually on the AODA using online training modules.
- Human Resources will support people to be trained in alternate ways if requested or required, and will keep a record of the training dates and outcomes

## **1. Customer Service Standard**

### **Accessible Customer Service**

- Policy, Accessible Customer Service, was created to meet Reg. 429/07.
- Staff and volunteers are trained on this policy. Training includes:
  - Purposes of the ACT and the requirements of the customer service standard;
  - How to interact and communicate with people with various types of disabilities;
  - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person;
  - What to do if a person with a disability is having difficulty in accessing NSS's or NTEC's supports and services.
- New hires and volunteers are trained using on-line training modules.
- NSS and NTEC submitted the AODA Self Certified Accessibility Report through Service Ontario stating that they had completed all requirements of the regulation. A copy of the report is located on the website.

## **2. Information and Communications Standard**

NSS and NTEC are committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs.

### **Feedback Processes**

NSS and NTEC have taken the following steps to ensure that feedback processes are available and meet the individual communication preferences when requested.

- NSS and NTEC have the feedback process available in alternative formats, including:
  - plain language satisfaction surveys for our service users;
  - feedback forms that can be filled out or someone can support them to fill one out
  - phone number;
  - on-line through our website;
  - via email through [mythoughts@ntec-nss.com](mailto:mythoughts@ntec-nss.com);



- using the AIMS® database system

### **Accessible Documents**

NSS and NTEC will ensure that publicly available documents are offered in accessible formats upon request.

- NSS and NTEC have a link on their website notifying users that all public documents are available in an accessible format upon request.

### **Accessible Website**

NSS and NTEC are launching a new website and have contacted the web designer to ensure that all content on Agency sites conforms to WCAG 2.0, Level AA.

## **3. Employment Standard**

NSS and NTEC are committed to fair and accessible employment practices.

### **Accommodation during an Emergency**

NSS and NTEC will continue to ensure that any employee who may have a disability, and who would require an accommodation plan during an emergency, is offered the option to have an accommodation plan developed.

### **Accommodation during Recruitment and Assessment**

NSS and NTEC are committed to fair and accessible employment practices. We will take the following steps to notify the public and staff (when requested) that NSS and NTEC will accommodate people with disabilities during the recruitment and assessment processes and when people are hired:

- Internal job postings will state that: “Niagara Support Services (NSS) and Niagara Training & Employment Agency (NTEC) are committed to workplace diversity and provide accommodations to applicants with disabilities throughout our hiring process. If you require an accommodation, please contact Human Resources. All requests will be addressed confidentially.”
- External job postings will state that: “Niagara Support Services (NSS) and Niagara Training & Employment Agency (NTEC) are committed to workplace diversity and provide accommodations to applicants with disabilities throughout our hiring process. If you require an accommodation, please contact Human Resources. All requests will be addressed confidentially.”
- The Agency recruitment policy will be reviewed and updated if necessary and policies will be re-circulated if necessary.



### **Individual Accommodation Plans and Return-to-Work Policies**

NSS and NTEC have taken the following steps to develop and put in place a process for developing individual accommodation plans and return-to-work policies for employees that have been absent due to a disability:

- Return-to-Work, Disability Management and related forms have been updated to reflect requirements

### **Performance Management, Career Development and Redeployment**

NSS and NTEC have taken the following steps to ensure the accessibility needs of employees with disabilities are taken into account when we are using performance management, career development and redeployment processes:

- Developed process to address accessibility needs during performance discussions, career development and/or redeployment.

## **4. Transportation Standard**

The Transportation Standards apply to public transportation (bus, train, subway, etc.). This standard is not applicable to NSS and NTEC.

## **5. Design of Public Spaces Standard**

NSS and NTEC will incorporate accessibility requirements under the IASR when building or redeveloping a public space as identified under the Accessibility Standard for the Design of Public Spaces.

## **6. Preventative and Emergency Maintenance of Accessible Elements in Public Spaces**

Pursuant to the Integrated Accessibility Standards Regulation (section 80.44) under the Accessibility for Ontarians with Disabilities Act, NSS and NTEC has procedures in place for preventative and emergency maintenance of accessible elements in its public spaces.

NSS and NTEC's procedures include the following:

- Managers of the workforce areas responsible for maintaining accessible elements in the NSS and NTEC public spaces, in conjunction with appropriate personnel, will develop



preventative maintenance schedules, as required, to keep the elements in good working order or restore them to their original condition when necessary.

- To the extent possible, notice regarding any disruption to accessible elements due to planned maintenance or repairs impacting customer accessibility will be posted in advance, including information about the disruption, its anticipated duration, and a description of alternative accessible elements that may be available. This notice may be provided by posting notices in a conspicuous place on NSS and NTEC premises, the NSS and NTEC website and/or such other method as is reasonable under the circumstances.
- NSS & NTEC personnel will inspect applicable accessible elements that are available for use by the public on agency premises on a regular basis. Any elements that are found to have defects or need maintenance will be identified and reported to NSS and NTEC Facilities Supervisor so they can be addressed. Typically, a work order and arrangements will be made to dispatch the appropriate crew(s), personnel and/or contractor(s) to correct the defect(s) or perform the necessary maintenance.
- In cases where it is determined that emergency maintenance or repairs to an accessible element are required, the element will be taken out of service and the necessary repairs will be assessed and addressed as a priority.
- To the extent possible, NSS and NTEC personnel will ensure steps are taken to divert individuals from accessible elements that are not in working order or pose a danger to safety, and to provide information regarding any alternate useable elements that exist. Steps taken may include putting in place barriers and temporary wayfinding signage, and/or posting notices, as indicated below.
- Notice of a disruption to an accessible element due to unplanned maintenance or repairs will be provided as soon as practically possible and, to the extent possible, will include information about the disruption, its anticipated duration, and a description of alternative accessible elements that may be available. This notice may be provided by posting information notices in a conspicuous place on agency premises, the agency website and/or such other method as is reasonable under the circumstances.

**For more information on this accessibility plan, please contact:**

Christine Dietz  
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905-384-3121

This plan and our policies are also available on our website and are available in an accessible format upon request.



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## COMMITMENT TO INCLUSIVITY

Niagara Support Services and Niagara Training & Employment Agency (together the “Employer”) is dedicated to promoting an equitable environment for people supported, employees and members of the community. As a champion of diversity and accessibility, the Employer recognizes that our efforts in promoting and ensuring accessible goods, services and facilities are a key driver to creating and sustaining an inclusive organization.

The Employer recognizes that our dedication to diversity and inclusion is intrinsically linked to fostering a rich learning and working environment. We not only recognize our obligations under the Ontario Human Rights Code, but we strive to maintain an equitable environment and continuously demonstrate leadership in creating an inclusive organization.

## PURPOSE

### Accessibility for Ontarians with Disabilities Act (AODA) and the Agency

The *Accessibility for Ontarians with Disabilities Act, 2005* fundamentally changed the approach to accessibility for people with disabilities by establishing accessibility standards that all organizations and businesses that operate in Ontario must adhere to. In this regard, organizations and businesses that provide goods and services in Ontario would be obligated to continually identify, remove and prevent barriers so that people with disabilities have more opportunities to participate in everyday life.

In 2008, the *Accessibility Standards for Customer Service (CSS)* became law. In 2011, the *Integrated Accessibility Standards Regulation (IASR)* harmonized the *Information and Communications, Employment and Transportation* standards. The IASR requirements are to be phased in from 2011 to 2021, with specific compliance deadlines for various sections of the regulation.

In accordance with the *Integrated Accessibility Standards Regulation (IASR)*, the Employer posts a Multi-Year Accessibility Plan, which outlines the Employer’s strategy to remove and prevent barriers under this regulation. The Employer uses the accessibility policy, to demonstrate our commitment to the obligations under all of the AODA Accessibility Standards. Our Multi- Year Accessibility Plan provides the strategy designed to meet all obligations under the AODA Accessibility Standards.

## SCOPE

### Accessibility Policies

In accordance with the *AODA, IASR, s.3*, the Employer will implement and maintain policies governing how the Employer will achieve accessibility through meeting its requirements in the *AODA Integrated Accessibility Standards Regulation*. The Employer will continue to adhere to the Accessibility Standards for Customer Service Policy, which is posted on the website in an accessible digital format. These policies apply to all employees, board members, volunteers and others who provide goods, services or facilities on behalf of the organization and serve the community.



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## DEFINITIONS

### Disability [as defined under the *Ontario Human Rights Code 10(1)*]

- 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, including diabetes mellitus, epilepsy, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or on a wheelchair or other remedial appliance or device,
- A condition of mental retardation or impairment,
- 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 *Workplace Safety and Insurance Act 1997.3*.

### Accessible formats

- May include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.

### 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.

### Communications

- Means the interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

### Conversion ready

- Means an electronic or digital format that facilitates conversion into an accessible format.

### Information

- Includes data, facts and knowledge that exist in any format, including text, audio, digital or images, and that conveys meaning.

## KEY PRINCIPLES

The Employer is committed to ensuring that all policies, practices and procedures established under the AODA accessibility standards, adhere to the following key principles.



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**Dignity** - services provided respect the dignity of persons with disabilities.

**Independence** - freedom from control or influence of others; in other words, the freedom to make one's own choices.

**Integration** - persons with disabilities may benefit from the same services, in the same place, and in the same or similar way as other customers.

**Equal Opportunity** - persons with disabilities have the same access as others to obtain, use and benefit from goods or services.

## **POLICY**

In addition to our continued obligation under the *CSS*, the Employer is required to meet accessibility obligations under the *AODA and IASR* according to the timetable specific for large non-profit sector organizations.

The purpose of this policy is to outline the Employer's commitment to help identify and remove barriers that impede a person's ability to access our goods, services and facilities.

## **PROCEDURE**

**1.0** The Employer will apply the principles and regulations of the AODA accessibility standards to ensure that all of our goods, services and facilities are inclusive of every person with or without a disability.

### **2.0 Accessibility Standards for Customer Service - *Ontario Regulation 429/07***

We are committed to ensuring that all persons may receive accessible goods and services in an equitable, timely manner. Our Accessible Customer Service policy outlines the various commitments and steps the Employer will take to ensure that employees, volunteers and community members receive equitable and effective customer experience.

### **3.0 Integrated Accessibility Standards - *Ontario Regulation 191/11***

In accordance with the *Integrated Accessibility Standards Regulation*, the Employer has made the following accessibility commitments.

#### **3.1 General Accessibility**

**3.1.1** The Employer has developed a Multi-Year Accessibility Plan, which outlines the Employer's strategy to prevent and remove barriers and meet its requirements under this Regulation. The plan is available in a digitally accessible format on the Employer website and is available in an alternate format upon request. The Employer will review and update the multi-year plan in consultation with others at least once every 5 years.



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**3.1.2** An accessible annual status report will be prepared and posted on the Employer website reflecting the initiatives and progress in removing and preventing barriers.

**3.1.3** The Employer will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities, except where it is not feasible to do so. In the event that it is not feasible to do so, and upon request, the Employer will provide a written explanation detailing why accessibility criteria could not be incorporated in the procurement or acquisition of goods, services and/or facilities.

**3.1.4** The Employer ensures that all employee groups, volunteers, persons who participate in the development of policies, and all other persons who provide goods, services or facilities on behalf of the Employer receive training on the requirements of the accessibility standards and on the *Ontario Human Rights Code*, as it pertains to persons with disabilities.

The training that is provided shall be appropriate to the duties of the employees, volunteers and other persons. The Employer has taken the necessary steps to ensure all new employees receive training as soon as practicable.

The Employer ensures that all employees, volunteers and other persons receive training as soon as possible regarding any changes made to this policy.

#### **4.0 Information and Communication**

**4.1** The Employer will meet the communication needs of persons with disabilities and will provide information and communication materials in accessible formats, or with communication supports upon request.

If the Employer determines that the information or communication is unconvertible, the Employer shall provide to the person requesting the information or communication with an explanation as to why it is unconvertible, a summary of the unconvertible information or communication.

For the purposes of this commitment and in accordance with this legislation, information and 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.

**4.2** The Employer will ensure that the processes for receiving and responding to feedback are accessible and will provide accessible formats and communication supports upon request. The Employer has an accessible feedback process established in accordance with the Accessibility Standards for Customer Service (O. Reg. 497/07), which is available on the Employer website.

**4.3** The Employer will provide or arrange for the provision of accessible formats and communication supports upon request for persons with disabilities, in a timely manner that takes into account the person's accessibility needs due to disability, and at a cost that is no more than the regular charged to other persons.



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The Employer consults with the person making the request in determining the suitability of an accessible format or communication support.

The Employer notifies the public about its commitment to the availability of accessible formats and communication supports through the Employer's website.

**4.4** The Employer has an Emergency Pandemic Plan document that outlines the emergency procedures to ensure the safety of the Employer's community. This information is made available on the Employer's website and is available in an alternative format, or with communication supports upon request.

**4.5** The Employer will ensure that their website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A and increasing to Level AA, in accordance with the schedule set out in this section of the regulation. This includes all web-based applications and web content that are controlled directly or through a contractual relationship.

**4.6** The Employer will provide education or training resources or materials in an accessible format that takes into account the accessibility needs due to a disability of the person upon request.

The Employer meets this obligation through the procurement process or through obtaining by other means an accessible or conversion-ready electronic format of the educational or training resources or materials where available. In the case that the materials cannot be procured or obtained by other means or converted into an accessible format, the Employer is committed to ensuring that it makes the necessary arrangements for the provision of a comparable resource.

This obligation includes educational or training resources or materials produced by the Employer in an accessible format to persons with disabilities upon request.

## **5.0 Employment**

The Employer is committed to ensuring that all employment practices are inclusive.

**5.1** The Employer will take the necessary steps to ensure the availability of accommodation for applicants with disabilities in its recruitment processes.

During the recruitment process the Employer will 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.

If a request for accommodation is made, the applicant will be consulted in order to 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.

**5.2** When making offers of employment to new employees, the Employer will inform new employees of the Employer's policy for accommodating employees with disabilities. This information will be made available in an accessible format or with communication supports upon request.



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**5.3** The Employer will inform its employees of its practices used to support its employees with disabilities, including but not limited to, the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information is provided to new employees as soon as practicable and all employees receive updates to any changes to the existing policies on the provision of job accommodation as soon as practicable.

**5.4** The Employer will ensure that all information and communication is available in accessible formats or with communication supports upon request. This includes information that is needed by an employee in order to perform their job and information that is generally available to all employees in the workplace.

**5.5** The Employer has prepared an Emergency Pandemic Plan document in a digitally accessible format that outlines the emergency procedures to ensure the safety of the Employer's community. In this document, there is information that provides the process and procedures the Employer has implemented to ensure the provision of individualized workplace emergency response information to employees who have a disability, and who have made a request of their need for accommodation due to the disability.

The Employer will only provide workplace emergency response information to those involved in the employee's individualized plan with consent from the employee with a disability.

The Employer reviews the information in the individualized workplace emergency response plan when the employee moves to a different location, when overall accommodation needs or plans are reviewed, and when general emergency response policies are reviewed.

**5.6** The Employer has in place a process for the development of documented individual accommodation plans for employees with disabilities. This information is available through the *Employer's AODA and Human Rights Accommodation Policy and Process*. In accordance with the obligations under this standard, the process includes the following elements:

- The manner in which an employee requesting an accommodation can participate in the development of the individual accommodation plan;
- The means by which the employee is assessed on an individual basis;
- 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;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done;
- If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.



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- The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability. The individual accommodation plans may include, if requested, any information regarding accessible formats and communication supports and individualized workplace emergency response information.

**5.7** The Employer has HR policies *Leave of Absence* and *Long-term Absence Management*, which are located on the Employer Policy Management platform. These policies outline the steps that the Employer takes to facilitate the return to work of employees who were absent because their disability required them to be away from work, and uses documented individual accommodation plans.

**5.8** The Employer will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans when using performance management, career development and advancement and redeployment practices.

## **6.0 Transportation**

The Employer will arrange for accessible transportation of people supported and employees if requested. The Employer will notify the public and/or employees when making transportation arrangements and/or if these arrangements must change.

## **7.0 Built Environment**

**7.1** The Employer is committed to incorporating accessibility standards in the construction of new facilities and during the renovation of existing spaces. The Employer utilizes accessibility standards that create barrier-free access to all spaces, for people supported, employees, and members of the community

**7.2** The Employer provides access to all its programs and services to all people who need it through physical or program accommodations.

**7.3** Entrance ramps are wide enough for use by people who use wheelchairs or other mobility services.

**7.4** Entrance ramps are constructed so that the rise does not exceed one foot for each 12 feet in length.

**7.5** Entrance ramps have non-slip surfaces with rails on one or both sides as required by people who use them.

**7.6** Doorways and corridors are wide enough to accommodate people who use wheelchairs or other mobility devices.

**7.7** Toilet, bathing, and hand-washing facilities are equipped with grab bars and are otherwise accessible.

**7.8** Work surfaces and storage facilities are accessible.

**7.9** Multi-story buildings are equipped to afford access to all levels on which services are provided. If the Employer has multi-story buildings, but all services are provided on the first floor, the remaining floors need not be accessible.



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**7.10** Buildings are equipped with modified features, such as light switches and temperature controls that allow access and can be used by all individuals served.