

Section 11 Accessibility for Ontarians with Disabilities	
Policy Title: Accessibility Plan	Approval Date: July 2015; February 2020
Policy No: 11.02	Review Date: February 2020

PREFACE

This is Dilico's initial Accessibility Plan, and is in effective from January 2020 to December 2022.

This document is intended as a guide and should not be construed as constituting legal advice.

It does not replace the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) or any policies of the Accessibility Directorate of Ontario as final authority.

PREAMBLE

In 2005, the Ontario Government passed the AODA to make Ontario accessible by 2025. The Accessibility Standard for Customer Service was the first standard to become law. The next three standards – Information and Communication, Employment, and Transportation – have been combined under one regulation, the Integrated Accessibility Standards Regulation (IASR). This regulation is now law and the requirements currently in regulation are being phased in between 2011 and 2021. The IASR also establishes the compliance framework for obligated organizations. To do so, mandatory and enforceable standards have been implemented. Dilico must implement the following Standards:



Customer Service Standard

- Established as regulation 429/07 on January 1, 2008
- Requirements include development of policies, practices and procedures and the provision of training for staff and student placements who interact with the public

Integrated Accessibility Standard Regulation (IASR)

- Established as regulation 191/11 on July 1, 2011
- Brings together three standard areas in one proposed Regulation: Information and Communication, Transportation, and Employment

This is Dilico's Accessibility Plan. Dilico meets the requirements of the current AODA legislation in effect; the organization continues to aim to be compliant with the remaining elements of the AODA legislation set out by the province as well as any other legislation that may come forward regarding accessibility.

This plan for 2020 – 2022 describes:

- 1. The measures that Dilico will employ to further identify, remove and prevent barriers for people with disabilities who work in or use or access any of Dilico's sites.
- 2. To develop, implement and enforce the mandatory standards, the AODA calls on the business community, public sector, not-for-profit sector and people with disabilities or their representatives to develop, implement and enforce mandatory accessibility standards.

These standards are the rules that businesses and organizations in Ontario will have to follow to identify, remove and prevent barriers to accessibility.

The first standard to come into effect is the Accessibility Customer Service Standard (refer to Agency Policy #11.01).

The Integrated Accessibility Standard Regulation (IASR), which is being phased in between 2011 and 2021, covers Customer Service, Employment, and Transportation Standards (the transportation standard does not apply to Dilico).

Ontario is also developing a new standard in the areas of Built Environment.

Dilico's Accessibility Plan will be updated every three years, however public notification will be posted on our website every year to give details on how the organization is meeting or exceeding its accessibility requirements.



AIM

The aim of this plan is to:

- 1. identify measures that we will take between January 1, 2020, and December 31, 2022;
- 2. clearly define how we will continue to develop our service to meet the needs of persons with various forms of disabilities.

OBJECTIVES

This plan intends to:

- 1. describe the process by which Dilico has identified, removed and prevented barriers to people with disabilities, based on the present AODA legislation and expected future legislation;
- 2. demonstrate Dilico's compliance with the Customer Service Standard and applicable sections of the IASR;
- 3. list the policies, programs, practices and services that Dilico will review in 2020 2022 to identify barriers to people with disabilities;
- 4. describe the measures Dilico will take in 2020 2022 to identify, remove and prevent barriers to people with disabilities and;
- 5. describe how Dilico will make this Accessibility Plan available to the public.



OUR VISION AND MISSION

- 1. To be identified as a self-governed organization that is recognized as a leader in the research and delivery of child welfare, mental health and addictions, and health services;
- 2. Delivery of community based services that enhance the well-being of Anishinabek children, families, and communities in a culturally safe manner.

Dilico promotes healing and the well-being of the Anishinabek people using an integrated holistic approach in a way that honours values, culture, and traditions.

STATEMENT OF COMMITMENT

Dilico embraces a holistic approach in the delivery of its services and is committed to treating all people in a way that allows them to maintain their dignity and independence while complimenting the strengths, values and traditions of Anishinabek children, families and communities. 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 in accordance with obligations under AODA.

Dilico will make every reasonable effort to ensure its policies and procedures are consistent with the following principles:

- Dignity and respect
- Independence
- Integration
- Equal opportunity

COMMITMENT TO ACCESSIBILITY PLANNING

Dilico is committed to:

- 1. the continual improvement of accessibility;
- 2. the participation, where possible, of people with disabilities in developing and reviewing of our annual accessibility plans;
- 3. working to ensure policies and procedures are consistent with the principles of accessibility.



PURPOSE OF THE ACCESSIBILITY PLAN

The Dilico Accessibility Plan will:

- 1. ensure Dilico's compliance to the AODA;
- 2. track and report progress;
- 3. show the implementation of other initiatives that help make Dilico and its services more accessible to all people.

ACCESSIBILTY COORDINATOR

Dilico's Assistant Director of Human Resources will continue to serve as the Accessibility Coordinator and will bring accessibility issues forward as required.

The Accessibility Coordinator will:

- 1. review legislation and seek out templates or other data to assist in developing a multi-year Accessibility Plan;
- 2. prepare a report on measures taken to identify, remove and prevent barriers to persons with disabilities;
- 3. seek support and consult with others as necessary;
- 4. assist when required, in developing mechanisms for addressing any recommendations that come forward through legislation or other sources;
- 5. make the Accessibility Plan available to the public after it is approved by Senior Management.

DEFINITIONS

Accessibility – means giving people of all abilities opportunities to participate fully in everyday life. It is used to describe how widely a service, product, device or environment is available to as many people as possible. Accessibility can be seen as the ability to access and benefit from a system, service, product or environment.

Barrier – are obstacles that limit access and prevent people with disabilities from fully participating in society. Most barriers are not intentional. Barriers usually arise because the needs of people with disabilities are not considered from the beginning.

Attitudinal – may result in people with disabilities being treated differently than people without disabilities.



Informational and Communication – arise when a person with a disability cannot easily receive and/or understand information that is available to others.

Technological – occur when technology or the way it is used does not meet the needs of people with disabilities.

Systemic – in policies, practices and procedures which result in people with disabilities being treated differently than others or sometimes excluded all together.

Physical and Architectural – in the environment and prevent access for people with disabilities.

Disability – the AODA adopts the definition for disability that is in the Ontario Human Rights Code. It defines disability broadly:

- a. "any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- b. a condition of mental impairment or developmental disability;
- c. a learning disability or dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d. a mental disorder or;
- e. an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997."



EVIDENCE OF COMMITMENT TO ADDRESSING POTENTIAL BARRIERS

- 1. Training provided to all staff on the AODA Customer Service Standard and our related policies and procedures, including:
 - a. how to provide customer service to persons with varying disabilities;
 - b. how to use on-site assistive devices such as lifts as well as how to respond when people with a disability ask to use their own devices;
 - c. allowing service animals onto Dilico premises;
 - d. welcoming support persons who accompany a person with a disability;
 - e. creation of a customer feedback system;
 - f. use of on-site and electronic notification of building closures or when other accessible services are unavailable.
- 2. Compliance with applicable sections of the new IASR including:
 - a. development of a multi-year Accessibility Plan;
 - b. review of Dilico's Statement of Commitment to help ensure it continues to strive toward becoming more accessible;
 - i. ensuring the Statement of Commitment is available to the public;
 - c. development of a new Accessibility Policy to ensure the organization continues to ingrain the concepts of improved accessibility into Dilico's operations;
 - i. ensuring that the new policy is available to the public;
 - d. consultation with people with disabilities to ensure Dilico is taking proactive steps to barrier reduction and improvement of its multi-year Accessibility Plan;
 - e. review of our website to ensure it has the improved accessibility features that comply with the *World Wide Web Consortium Web Content Accessibility Guidelines WCAG 2.0 Level A*, the leading standard on web accessibility;
 - f. incorporate AODA information links onto the Dilico website and post all AODA related policies;
 - g. notify employees and the public about the availability of any accommodation for applicants with disabilities in the recruitment process;
 - h. notify successful job applicants of any accommodation available to them;
 - i. inform its employees of its policies used to support its employees with disabilities
 - j. develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities;



- k. develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Dilico will document this process.
- 3. Physical and other barrier reduction initiatives including:
 - a. ground level accessible entrances and/or reception areas at all Dilico sites including availability of ramps;
 - accessible entrances at the Agency Operated Homes (AOHs) as well as lifts, where stairs would be an obstacle. 208 Wolf Court is the designated home for accessibility;
 - c. accessible washroom facilities at all Dilico sites, including wide automatic doors, large turnaround spaces and stalls, grab bars, etc.;
 - d. use of consistent form for notification of any and all displayed service disruptions;
 - e. providing alternative accessible services such as large format print, upon request;
 - f. font standard for readability by persons with vision impairments;
 - g. improved marking of accessible parking spaces in main parking lot;
 - h. appropriate height signage on washroom doors.

ACCESSIBILTY GOALS DILICO WILL ACHIEVE BY DECEMBER 31, 2022

Physical:

- 1. Ensure all current Dilico sites meet accessibility standards through current building legislation
- 2. Ensure all future Dilico sites will meet accessibility standards through current building legislation

Information:

- 1. Provide a public update on our accessibility goals and requirements
- 2. Update our website to include a link to AODA policies and related material and ensure they are clear and understandable to persons with disabilities
- 3. Develop a formal online feedback process on our website as well as large print formats/options
- 4. Ensure website conforms to WCAG 2.0 Level AA



Policies and Procedures:

- 1. Develop alternative formats for our AODA policies and related material and have these available upon request.
- 2. Review our Human Resource recruitment policies to ensure we can offer alternative formats for interviews and recruitment as required
- 3. Ensure that training is provided on the requirements of the Accessibility Standards referred to in this Regulation and on the Human Rights Code as it pertains to persons with disabilities
 - a. Records of training will be kept on file

BARRIER IDENTIFICATION METHODOLOGIES

As part of developing our Accessibility Plan, we will routinely ask staff and where applicable, the families we serve, and persons with disabilities in any role that would be qualified to identify potential barriers, for feedback on how we are doing in terms of addressing accessibility in the workplace. Improvements will continue to be made based on the input we receive or as new legislation or standards become available.

REVIEW AND MONITORING PROCESS

The Accessibility Coordinator will continue to provide annual updates, review suggestions and recommend both short and long term objectives to ensure AODA compliance as well as identify other barrier reduction strategies. The Coordinator will continue to monitor any barriers or challenges that may be identified and addressed at any of the Dilico locations. The Coordinator will also commit to making reports or presentations as required.

COMMUNICATION OF THE PLAN

This Accessibility Plan will be available in print format at all our sites. A digital version will be available on our website. If requested, the Plan can be made available in large print or can read by a member of the Dilico staff.



RELATED FORMS AND POLICIES		
1.	#11.01	Customer Service Standard
2.	#11.03	Accessibility
3.	#11.04	Communication
4.	#11.05	Service Animals
5.	#11.06	Assistive Devices
6.	#11.07	Temporary Disruptions
7.	#11.08	Support Person(s)
8.	#11.09	Accessibility Training
9.	#11.10	Feedback Process