



## **Children's Aid Society of Toronto (CAST) Accessibility Policy – Statement of Organizational Commitment**

### **Purpose**

In 2005 the Government of Ontario passed the *Accessibility for Ontarians with Disabilities Act* (AODA) to support the full inclusion of persons with disabilities. It is the goal of the Government of Ontario to make Ontario accessible by 2025.

This policy has been developed in accordance with the AODA Integrated Accessibility Standards Regulation (IASR) and addresses how the Children's Aid Society of Toronto (CAST) will achieve accessibility in accordance with the timeframes established by the Regulation. It provides the overall strategic direction that CAST will follow to provide accessibility supports to Ontarians with disabilities.

The requirements of the Regulation that apply to CAST include:

- Establishment, implementation, maintenance and documentation of a multi-year accessibility plan, which outlines the CAST's strategy to prevent and remove barriers and meet its requirements under the Regulations;
- Training; and
- Other specific requirements under the IASR which includes the Information and Communication, Employment and Built Standards.

### **Policy**

CAST is committed to treating all 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*.

The requirements set out in this policy and the AODA Regulations are not a replacement or substitution for the requirements established under the Ontario *Human Rights Code* (the Code) nor do the standards or policy limit any obligation owed to persons with disabilities under any other legislation.

## **Definitions**

**“Accessible Formats”** are an alternative to standard print and 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.

**“Disabilities”** shall mean the same as the definition of disability found in the Ontario *Human Rights Code*:

- (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 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,
- (b) A condition of mental impairment or a developmental disability,
- (c) A learning disability, or a 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.

**“Individual Accommodation Plan”** is a plan developed by CAST in conjunction with an employee with a disability that documents the accommodations that will be provided so the employee can do his or her job. These plans are living documents and are to be reviewed regularly.

**“Individualized Workplace Emergency Response Information”** refers to the information prepared by CAST, in consultation with employees who have disabilities, to help them prepare for emergencies such as fire, severe weather and power outages.

**“Internet Website”** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

**“Redeployment”** means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated.

**“Unconvertible”** means

- (a) It is not technically feasible to convert the information or communications;
- (b) The technology to convert the information or communications is not readily available.

**“Web Content Accessibility Guidelines (WCAG) 2.0”** means the World Wide Web consortium recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0. It is an international standard for making websites and web content accessible to a broader range of users with disabilities. WCAG 2.0 Level A and Level AA refer to a series of technical checkpoints that make websites and their content increasingly accessible. Level AA builds on Level A’s checkpoints.

## **General Provisions**

### **Multi-Year Accessibility Plan**

CAST’s multi-year accessibility plan outlines a phased-in strategy to prevent and remove barriers and addresses the current and future requirements of the AODA. CAST will review and update the plan at least once every five years and report on the progress of measures taken as required on our website ([www.torontocas.ca](http://www.torontocas.ca)). The plan and status report will be provided in alternative formats upon request.

### **Training**

CAST will provide appropriate training on the IASR and on the Code as it relates to people with disabilities to the following: employees, volunteers including Board Members, foster and care providers, all persons who participate in developing the organization’s policies and all other persons who provide goods, services or facilities on behalf of CAST.

Employees will be trained when changes are made to the accessibility policy. New employees will be trained as soon as practicable.

CAST will maintain a record of the dates when training is provided and the number of individuals to whom it was provided.

## **Information and Communication Standard**

### **Accessible Formats and Communication Supports**

CAST is committed to making our information and communications accessible to persons with disabilities. This includes emergency procedures, plans or public safety information, which are prepared by CAST and are made available to the public.

Accessible formats and communication supports for persons with disabilities will be provided:

- Upon request, in a timely manner that takes into account the person's accessibility needs due to a disability;
- At a cost that is no more than the regular cost charged to other persons;
- In consultation with the person making the request to determine the suitability of an accessible format or communication support.

If CAST determines that it is not technically feasible to convert the information or communications, or the technology to convert the information or communication is not readily available, that person who requires the information will be provided with:

- An explanation as to why the information or communications are not convertible; and
- A summary of the unconvertible information or communications.

The public shall be notified about the availability of accessible formats and communication supports.

### **Feedback**

CAST will continue to ensure that existing and new processes for receiving and responding to feedback are accessible to people with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request.

### **Website Accessibility**

CAST will ensure that our internet websites, including web content, conform to the WCAG 2.0 Level AA requirements as listed in the IASR.

### **Employment Standard**

CAST is committed to fair and accessible employment practices that attract and retain employees with disabilities. This includes providing accessibility throughout all stages of the employment cycle.

## **Recruitment and Retention**

CAST will:

- Notify internal and external job applicants about the availability of accommodations for applicants with disabilities to support their full participation in the recruitment process;
- 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;
- Consult with the applicant and provide or arrange for the provision of a suitable accommodation that takes into account the applicant's accessibility needs when a selected applicant requests an accommodation;
- Notify successful applicants of our policies for accommodating employees with disabilities when making offers of employment.

## **Informing Employees of Supports**

CAST will continue to inform all new and existing employees of our policies for supporting employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This information will be provided to new employees, as soon as practicable after they begin their employment.

## **Accessible Formats and Communication Supports**

When an employee with a disability requests it, CAST 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;
- For information that is generally available to employees in the workplace (i.e., agendas, meeting minutes, newsletters, forms, etc.); and
- To determine the suitability of an accessible format or communication support.

If the employee has an individual accommodation plan, then the accessible formats and/or communication supports that will be provided to the employee will be included in the plan.

## **Workplace Emergency Response Information**

CAST provides individualized workplace emergency response information to employees who have a disability:

- If the disability is such that the individualized information is necessary and CAST is aware of the need for accommodation due to the employee's disability;

- With the employee's consent, to the person designated by CAST and the employee to provide assistance to the employee, if required;
- As soon as practicable after becoming aware of the need for accommodation due to the employee's disability;
- And will review the individualized workplace emergency response information when the employee moves to a different location in the organization, when overall accommodations needs or plans are reviewed and when CAST reviews its general emergency response policies.

## **Accommodation Process and Individual Accommodation Plans (IAP)**

CAST will incorporate new accessibility requirements under the IASR to its disability accommodation and return to work policy and processes. Such processes will be documented and outline the steps that CAST will take to facilitate the return to work and include an individual accommodation plan. CAST will ensure that the process for the development of documented individual accommodation plans includes:

- The manner of the employee's participation in the development of the IAP;
- The means of assessment on an individual basis;
- Identification of accommodations to be provided;
- Timelines for the provision of accommodations;
- Upon request of CAST, an evaluation by outside medical or another expert, at CAST's expense, to assist with determining accommodation needs and how to best achieve accommodation;
- Union representative for the employee, upon request or another CAST colleague, as appropriate;
- Steps taken to protect the privacy of the employee's personal information;
- Frequency with which the IAP will be reviewed and updated and the manner in which it will be done;
- If an IAP is denied, the reasons for denial are to be provided to the employee;
- A format that takes into account the employee's disability needs;
- If requested, any information regarding accessible formats and communication supports provided;
- Individualized workplace emergency response information, if necessary;
- Identification of any other accommodation that is to be provided.

## **Return to Work**

CAST will incorporate new accessibility requirements under the IASR regulations to its return to work policy and process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. Such processes will be

documented and will outline the steps that CAST will take to facilitate the return to work and include an individual accommodation plan.

The return to work process is not intended to replace or override any other return to work process created by or under any other statute (i.e., *Workplace Safety and Insurance Act, 1997*).

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

Accessibility needs and/or individual accommodation plans of employees will be considered when:

- Using performance management processes;
- Providing career development and advancement information;
- Using redeployment procedures.

## **Built Environment Standard**

CAST is committed to incorporating barrier-free principles in the construction of new facilities. It is also committed to incorporating barrier-free principles during the renovation of existing structures, taking into consideration the constraints of the existing structures.

This document is available in accessible formats upon request.

Effective Date: January 1, 2014