

AODA ACCESSIBILITY POLICY

Approved by	Executive Management Team
Last reviewed:	December 20, 2023 (next review to be within one year of this date)
Responsible Role	VP, Human Resources
Responsible Department	Human Resources

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AODA ACCESSIBILITY POLICY

SECTION 1 – INTRODUCTION

1.1 Purpose

The purpose of this policy is to fulfill the requirements set out in regulation 191/11 of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

1.2 Scope

This policy applies to all JVS Toronto employees, Board and Board committee members, volunteers, students, contractors or consultants who are working at JVS Toronto or acting on behalf of JVS Toronto.

1.3 Definitions

Word/Term	Definition
Disability	The Accessibility for Ontarians with Disabilities Act(AODA) S.O. 2005, defines this term as: (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; (“handicap”)
Assistive Devices	Any device that helps someone do something that they might not otherwise be able to do well or at all. Generally, the term is used for devices that help people with mobility, vision, mental, dexterity or hearing loss.
Service Animal	An animal that has been trained to perform tasks that assist people with disabilities. Service animals may also be referred to as assistance animals, assist animals, support animals, or helper animals depending on the country and the animal's function.

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1.4 Related Policies

Human Rights Policy
Code of Conduct Policy
Customer Service Policy
Customer Complaint Policy
Equity, Diversity and Inclusion Policy
Workplace Accommodation Policy

1.4.1 Privacy Policies

1.5 Legislative Context

Accessibility for Ontarians with Disabilities Act
Ontarians with Disabilities Act
Ontario Human Rights Code
Services and Supports to Promote the Social Inclusion of Persons with Developmental Disabilities Act
Blind Persons' Rights Act

SECTION 2 – POLICY

NOTE: The following section “RESPONSIBILITY & PROCEDURE” represents best practices as determined by JVS Toronto, and is largely designed to provide guidance to designated JVS Toronto representatives. However, it is understood that, where appropriate, these representatives may adopt modified procedures in response to any given circumstance. Procedural Guidelines continue on this and the following page(s).

SECTION 3 – RESPONSIBILITY & PROCEDURE

3.1.1 Our Commitment

JVS Toronto is dedicated to ensuring equal access and participation for individuals with disabilities. We treat people with disabilities with dignity and independence, striving to meet their needs promptly. We actively remove and prevent barriers to accessibility, adhering to the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Our commitment extends to current and ongoing obligations under the Ontario Human Rights Code. We understand that AODA obligations complement rather than substitute our responsibilities under other laws.

3.1.2 Providing goods and services to people with disabilities

JVS Toronto is dedicated to excellence in serving all customers, including those with disabilities. Our accessibility policy align with principles of independence, dignity, and equality of opportunity.

3.1.2 (a) Communication JVS Toronto communicates with people with disabilities in ways that take into account their disability. This may include the following:

- Giving customers our full attention
- Offering a variety of methods of communication such as emails, letters, or documents, upon request.
- Accepting and acting upon feedback
- Speaking directly to the person with a disability rather than an interpreter or support person.

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- Using “people first” language. For example, “person with a disability” NOT “disabled person”
- Welcoming and accommodating the use of assistive devices that individuals may require.
- Offering information in alternative formats, such as large print, or electronic formats, upon request.
- Ensuring our digital platforms are accessible and compatible with assistive technologies.

We are dedicated to working with individuals to understand their specific communication needs and providing the necessary support to facilitate effective interaction.

We also meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements in accordance with Ontario’s accessibility laws.

3.1.2 (b) Assistive devices

JVS Toronto is committed to serving and making our workplace and facilities accessible for people with disabilities who use assistive devices.

In cases where the physical environment presents a significant and unavoidable health or safety concern for individuals with assistive devices, other measures will be used to ensure the person with a disability can access services. For example, we may provide alternative communication methods, delivery of services or personal assistance.

3.1.3 Service Animals

JVS Toronto is committed to welcoming people with disabilities who are accompanied by a service animal on our premises.

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, such as a special vest or harness indicating that they are a service animal, the individual may be asked to show documentation from one of the following regulated health professionals.

If a health and safety concern presents itself for example in the form of a severe allergy to the animal, JVS Toronto will make all reasonable efforts to meet the needs of all individuals.

3.1.4 Support Persons

JVS Toronto is committed to welcoming people with disabilities who are accompanied by a support person. If the program/service involves a participant fee, this fee will be waived for the support person.

In certain cases, JVS Toronto might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

Before making a decision, JVS Toronto will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is any other reasonable way to protect the health or safety of the person or others on the premises

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3.1.5 Notice of temporary disruption

In the event of a planned or unexpected disruption to services or facilities for customers, staff or any stakeholders with disabilities, JVS Toronto notifies individuals promptly. Notices include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice may be posted at public entrances, on the Service Interruption Notices page on the JVS Toronto website and on social media platforms and any other method that may be reasonable under the circumstances.

3.1.6 Training

JVS Toronto provides accessibility training to all employees and volunteers who deal with the public or other third parties on its behalf, and all those who are involved in the development and approvals of customer service policies, practices and procedures. All employees, students and volunteers are required to sign a declaration indicating they understand the JVS Toronto Accessibility Policy and agree to comply.

Training includes the following:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the Customer Service Standards
- 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 particular type of disability is having difficulty accessing JVS Toronto services

Staff are also trained on an ongoing basis when changes are made to these policies, practices and procedures.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

3.1.7 Employment

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. If an accommodation is requested, we consult with the applicants and provide or arrange for suitable accommodation.

We notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

We share JVS Toronto's accessibility policy as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee's accessibility needs due to a disability.

If an employee requires an accommodation due to a disability, Human Resources follows JVS Toronto's Return to Work & Accommodation Policy to develop an accommodation plan suitable to their needs and the return to work processes outlined in the policy as needed.

Where needed, we will also provide customized emergency information to help an employee with a

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disability during an emergency. With the employee's consent, we will provide workplace emergency information to a designated person who is providing assistance to that employee during an emergency.

We will provide the information as soon as practicable after we become aware of the need for accommodation due to the employee's disability.

We will review the individualized workplace emergency response information:

- a) when the employee moves to a different location in the organization;
- b) when the employee's overall accommodations needs or plans are reviewed; and
- c) when the employer reviews its general emergency response policies.

We have a written process to develop individual accommodation plans for employees.

We have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Our performance management, career development and redeployment processes take into account the accessibility needs of all employees.

3.1.8 Feedback process

JVS Toronto welcomes feedback on accessibility of our workplace and facilities, and how we provide accessible customer service. Feedback will help us identify barriers and respond to concerns. Feedback can be provided in person, by phone or in writing. JVS Toronto ensures our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

Complaints from JVS Toronto employees will be addressed directly by the Human Resource Department.

Customer and stakeholder complaints about accessibility are directed to the Quality Assurance Designate and addressed through the JVS Toronto Customer Complaints Policy

3.1.9 Modifications to this or other policies

Any policy of JVS Toronto that does not respect and promote the dignity, independence, integration and equal opportunity of people with disabilities will be modified or removed.

This document is publicly available. Accessible formats available upon request.

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SECTION 4 – GOVERNANCE

4.1 Policy Owner

Policy Owner	VP, Human Resources
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4.2 Version Control and Change History

Version Number	Approval Date	Approved by	Amendment
Version 8	Dec 19, 2023	EMT	
Version 7	n/a	n/a	This policy was reviewed by Human Resources on August 19, 2021.
Version 6	n/a	n/a	This policy was updated to change the title of Vice President, Human Resources and Quality Assurance Designate.
Version 5	n/a	n/a	This policy was reviewed by the Director, Human Resources on August 9, 2017
Version 4	n/a	n/a	This policy was reviewed by the Vice President, Human Resources on June 23, 2015. Policy ownership was changed to Vice President, Human Resources.
Version 3	n/a	n/a	This policy was reviewed and edited for wording consistency on June 26, 2013.
Version 2	May 4, 2011	EMT	
Version 1	October 2009		