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|------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| Policy and Process:    | <b>A – 240 – Accessibility Policy – Elements</b><br>(formerly: Providing goods, services or facilities to people with disabilities) |
| Effective Date:        | August 1, 2018                                                                                                                      |
| Approved By:           | Chief Operating Officer                                                                                                             |
| Responsibility:        | Director of Corporate Services                                                                                                      |
| Review Frequency:      | Every four years                                                                                                                    |
| Last Review Date:      | <b>December 1, 2023</b> , May 1, 2023                                                                                               |
| Scope:                 | All employees                                                                                                                       |
| Authorizing Signature: |                                                    |

## Statement of Organizational Commitment

**Elements Support Services** (Elements) is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence. We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians with Disabilities Act and Ontario's accessibility laws.

Elements is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Elements understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)* and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

Elements is committed to excellence in serving and providing services or facilities to all customers including people with disabilities.

Our accessible customer service policies are consistent with the principles of independence, dignity, integration and equality of opportunity for people with disabilities.

## Training

We are committed to training all staff in accessible customer service, other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide goods, services or facilities on behalf of the organization

Training of our employees on accessibility will be related to their specific roles.

Training includes:

- purpose of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard
- Elements' policies related to 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
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities. These include mobility devices, canes, etc
- what to do if a person with a disability is having difficulty in accessing Elements' goods, services or facilities

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

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.

### **Assistive devices**

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities. Alternate measures will be determined as required to enable an individual to access services.

The nature of our business includes supporting individuals who may have accessibility challenges, as such our service staff, associates and coordinators have, as part of their professional training learned how to support individuals with various physical and cognitive disabilities.

### **Communication**

We will communicate with people with disabilities in ways that take into account their disability. This may include the following:

- Updates and news on our website
- Provide print material in large print as required
- Include interpreters as needed

We will work with the person with a disability to determine what method of communication works for them.

## **Service animals**

We welcome people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When we cannot easily identify that an animal is a service animal, our staff may ask a person to provide documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:

- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

## **Support persons**

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

As a support service provider, we will ensure our employees, associates and coordinators advocate on behalf of our clients to address any accessibility challenges they may face.

## **Notice of temporary disruption**

In the event of a planned or unexpected disruption to services or facilities for customers with disabilities, Elements will notify clients promptly.

Any disruption notices will be provided to clients in the format of their choosing. Notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

## **Feedback process**

Elements welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Feedback may be provided by anyone in the following ways: by telephone, fax, email, mail or via our website.

Customers who wish to provide feedback on the way Elements provides goods, services or facilities to people with disabilities can provide feedback in the following way(s): in person with their individual provider, by telephone or email.

All feedback, including complaints, will be handled in the following manner: Feedback will be forwarded to the Director or Coordinator responsible for the service area. A record of the feedback will also be sent to the head office administrative staff and retained for at least 1 year.

Customers can expect to hear back in ten business days.

Elements will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and/or communication supports on request.

### **Notice of availability of documents**

Elements will notify the public that documents related to accessible customer service are available upon request by posting a notice on our website.

Elements will provide this document in an accessible format or with communication support, on request. We will consult with the person making the request to determine the suitability of the format or communication support. We will provide the accessible format in a timely manner and at no additional cost to the customer. This commitment applies to any materials or documents produced by Elements or on behalf of Elements for release to the public or to the person to whom it pertains. It does not apply to unconvertible information or information that Elements does not control directly or indirectly or through a contractual relationship.

The timeframe for the conversion process of a document into an accessible format, or the provision of a communication support can vary depending on the media chosen, the size, complexity, quality of source documents and the number of documents to be converted. The information requested shall be provided in a timely manner depending on the factors noted above.

### **Information and Communications**

We have a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request. Requests for accessible format or communication support can be received by any staff in person, by telephone, in writing or via email. Upon receipt of a request, staff complete the **Request for Elements Documentation in an Accessible Format or with Communication Support Form (Appendix A)**, which is to be forwarded to the Director of Corporate Services for record-keeping purposes only. The person's request is to be responded to by the appropriate staff, who will consult with the individual to provide or make arrangements to provide accessible formats and communication supports.

We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a. in a timely manner, taking into account the person's accessibility needs due to disability; and
- b. at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a. an explanation as to why the information or communications are unconvertible; and
- b. a summary of the unconvertible information or communications.

We notify the public about the availability of accessible formats and communication supports via our website.

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

## **Employment**

We notify employees, job applicants and the public that accommodations can be made during recruitment and hiring. We notify job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request. 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 notify staff that supports are available for those with disabilities 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.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a. information that is needed in order to perform the employee's job; and
- b. information that is generally available to employees in the workplace

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

Reference: **Workplace Emergency Response Plan** (Appendix B)

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

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.

Please see **Individual Medical Accommodation Plan** (Appendix C). This form is to be completed by the employee and their manager in conjunction with Human Resources.

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

### **Modifications to this or other policies**

Any policies of Elements that do not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.

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

## Appendix A

### Request for Elements Documentation in an Accessible Format or with Communication Support

To be completed by or with the requester

| Personal Information |  |
|----------------------|--|
| First Name           |  |
| Last Name            |  |

| Address     |  |
|-------------|--|
| Street      |  |
| City        |  |
| Postal Code |  |

| Contact Information     |                                      |
|-------------------------|--------------------------------------|
| Phone Number            |                                      |
| Email Address           |                                      |
| Communication preferred | English_____ French_____ (check one) |

| Document Information   |  |
|------------------------|--|
| Name of Document or    |  |
| Name and Date of Event |  |

| Description of Accessible Format or Communication Support Being requested |
|---------------------------------------------------------------------------|
|                                                                           |

| Office use only               |  |
|-------------------------------|--|
| Request submitted to (name)   |  |
| Request received on: (date)   |  |
| To be responded to by: (date) |  |

## Appendix B

### Workplace Emergency Response Plan – Request for Assistance

To be completed by or with the requester

| Personal Information |  |
|----------------------|--|
| First Name           |  |
| Last Name            |  |
| Title                |  |

| Workplace Address                                                  |  |
|--------------------------------------------------------------------|--|
| Street Address                                                     |  |
| Type of work location (eg. Office, school, home)                   |  |
| Other details (e.g., Elevators, stairs, accessibility information) |  |

| Contact Information     |                                        |
|-------------------------|----------------------------------------|
| Phone Number            |                                        |
| Email Address           |                                        |
| Communication preferred | English _____ French _____ (check one) |

| Description of Assistance Required in the Event of an Emergency |
|-----------------------------------------------------------------|
| <br><br><br><br><br><br><br><br><br><br>                        |
| Details of Planned Assistance in the Event of an Emergency      |
| <br><br><br><br><br><br><br><br><br><br>                        |

| Office use only               |  |
|-------------------------------|--|
| Request submitted to (name)   |  |
| Request received on: (date)   |  |
| To be responded to by: (date) |  |



## Appendix C

### Individual Medical Accommodation Plan

This form is intended to facilitate accommodation planning for employees returning to their full duties and or in developing a plan to support an employee's medical accommodation requirements.

This plan should be completed by the employee and their manager in conjunction with Human Resources.

|                       |  |
|-----------------------|--|
| <b>Date:</b>          |  |
| <b>Employee Name:</b> |  |
| <b>Position:</b>      |  |
| <b>Work Location:</b> |  |
| <b>Supervisor:</b>    |  |

|                                               |
|-----------------------------------------------|
| <b>Description of Accommodation Requested</b> |
|                                               |

|                                                                                                                      |
|----------------------------------------------------------------------------------------------------------------------|
| <b>Has medical documentation been supplied? (eg, note from medical professional, Functional Abilities Form, etc)</b> |
|                                                                                                                      |

|                                                         |
|---------------------------------------------------------|
| <b>Estimated Timeframe for Requested Accommodation:</b> |
|                                                         |

|                                                             |
|-------------------------------------------------------------|
| <b>Details of Agreed-Upon Plan to Accommodate Employee:</b> |
|                                                             |

|                          |
|--------------------------|
| <b>Next Review Date:</b> |
|                          |

**ACKNOWLEDGEMENT:**

This plan is intended for the planning and implementation of the employee's medical accommodation requirements and will be reviewed regularly and amended as necessary to ensure a progressive and safe return to full duties.

|                               |  |
|-------------------------------|--|
| Employee Signature:           |  |
| Employee Name: (please print) |  |
| Date:                         |  |

|                               |  |
|-------------------------------|--|
| Supervisor Signature:         |  |
| Employee Name: (please print) |  |
| Date:                         |  |

|                               |  |
|-------------------------------|--|
| HR Staff Signature:           |  |
| Employee Name: (please print) |  |
| Date:                         |  |