Developmental Services of Leeds and Grenville Commitment and Implementation Strategy
For The
Integrated Accessibility Standards, Employment Standard, Information and Communication Regulations

April 2013

Revisions control page

Date	Summary of changes made	Changes made by (Name)
June, 2013	Draft of Developmental Services of Leeds and Grenville Commitment and Implementation Strategy For The Integrated Accessibility Standards, Employment Standard, Information and Communication Regulations Requirement.	Lisa Crawford

Introduction

Developmental Services of Leeds and Grenville completed its first Accessibility Plan in 2010 in part, as preparation for the implementation of requirements for Regulation 429/07 Accessibility for Ontarians with Disabilities Act.   However, the organization has been committed to and has actively invested its resources to assist in the removal of barriers and to improve accessibility for people receiving services for thirty years.

Developmental Services of Leeds and Grenville's Accessibility Plan addresses accessibility issues at our program locations and in the community at large.   The organization and its staff are committed to identifying and removing barriers that reduce the ability of all persons to fully access both our programs and the community as a whole.   In preparing our Commitment and Implementation Strategy for the Integrated Accessibility Standards Regulation, Employment Standard and Information and Communication Regulations Requirement, Developmental Services of Leeds and Grenville considered the following:

- The strategy will identify key strategic actions the organization will need to take over the course of the next few years to ensure it implements all of the Integrated Accessibility Standard Regulations, Employment Standard and Information and Communication required for an agency of its size and nature.
- The strategy shall document will identify all necessary components requiring DSLG action to address requirements of the Integrated Accessibility Standard Regulation.
- The strategy shall examine all aspects of its operations, including its best practices, facilities, programs and supports to determine their effect on accessibility of persons served in relation to the regulations.
- The strategy shall report on barriers that have been identified through the Agencies Accessibility Self Audit/ Assessment
- The plan will identify key strategic actions the organization will need to take over the course of the next few years to ensure it maintains momentum towards achieving an accessible community as outlined in the AODA.
- Itemized action items identified in this report will be added to the agencies multi-year accessibility plan to ensure that actions are taken to address and ensure DSLG is in compliance with the IASR.

Scope

The scope of this plan is limited to in the events that the agency is aware of in relation to Accessibility and it not meant to address emergency circumstances that are beyond the organizations control.   This is an Commitment and Implementation Strategy, not a daily problem resolution procedures document and as such, these items fall outside the scope of this document.   It is recognized that there will be some duplication of themes and content between the Implementation Strategy and the Multi-year accessibility plan;

the implementation strategy is designed to identify what needs to be done, central to the organizations commitments to addressing accessibility and follow the AODA Regulation, while the Multi-year accessibility plan is designed to track progress towards achieving these goals and following through on the agencies commitment into practice.

AODA Standards

The Accessibility for Ontarians with Disabilities Act Standards addressed within the confines of this document is as follows:

1. Overview of the Act
2. Customer Service Standard
3. Integrated Accessibility Standard
   a. Statement of Organizational Commitment
   b. Multi Year Accessibility Plans
   c. Purchasing or Acquiring Goods, Services or Facilities
   d. Self Service Kiosks
   e. Accessibility and Human Rights Training
4. Standard for Information and Communications
5. Standard for Employment
   a. Human Rights Code
6. Standard for Transportation
7. Standard for Built Environment

Overview of the Act

The Accessibility for Ontarians with Disabilities Act (AODA) is a law in Ontario that allows the government to develop specific standards of accessibility and to enforce them. The Accessibility for Ontarians with Disabilities Act (AODA) was passed in 2005, with the goal of creating standards to improve accessibility across the province by 2025. One goal of AODA was to remove barriers so that all individuals have access to goods, services, facilities, accommodation, employment, buildings, structures and premises.

A second goal was to provide for involvement of persons with disabilities, the Government of Ontario and representatives of industries and various sectors in the development of accessibility standards.   As part of the AODA Act Developmental Services of Leeds and Grenville needs to ensure that when providing services and supports that we accommodate the person with the disability (service recipient) and any family member who have a disability.

The AODA goal and purpose will be accomplished through the implementation of mandatory accessibility standards in six central areas of everyday living.

- Customer Service Standard

- Integrated Accessibility Standards
  - Information and Communication
  - Employment
  - Transportation and
- Built Environment

Each one of these standards will be phased in over the between now and 2025. The Act and standards applies to broad public sector organizations including Developmental Services of Leeds and Grenville

Integrated Accessibility Standard

Statement of Organizational Commitment

The organization and its staff are committed to identifying and removing barriers that reduce the ability of all persons to fully access both our programs and the community as a whole. In preparing our Commitment and Implementation Strategy for the Integrated Accessibility Standards Regulation, Employment Standard and Information and Communication Regulations Requirement, Developmental Services of Leeds and Grenville considered the following:

- The integrated Accessibility Standards Regulation (IASR) establishes accessibility standards and introduces requirements for:
  - Information and Communications,
  - Employment and
  - Transportation
- The IASR also establishes the compliance framework for obligated organizations
- The IASR applies to all public, private and not-for-profit organizations, with at least one employee.
- Organizations have current and ongoing obligations under the Ontario Human Rights Code (OHRC) respecting non-discrimination. The IASR does not replace or affect the existing legal obligations under the Ontario Human Rights Code and other laws in respect to accommodations of people with disabilities.
- Organizations must comply with both pieces of the legislation. The OHRC is an individual, complaints-based legislation that addresses discrimination.
- The IASR, created under AODA, applies to all organizations in Ontario and will increase accessibility for all.

Developmental Services of Leeds and Grenville is committed to implementing all of the requirements outlined in the Integrated Accessibility Standard Regulation and ensuring that all necessary individuals receive training on the various components of the regulation as applicable.

Purchasing or Acquiring Goods, Services or Facilities

Developmental Services of Leeds and Grenville is committed considering the requirements of the IASR when purchasing or acquiring Goods, Services and or Facilities to ensure that we do not decrease accessibility or create new barriers to accessibility when making purchases. Examples of this included:

- Reviewing all building rentals/purchases with accessibility in mind to ensure built environments are accessible and or barrier free.
- Purchasing accessible furniture that allows for high adjustments in chairs and or lumbar supports/ wheel chair access to workstations etc.,.
- Increasing the size and adjustment capabilities of computer monitors to allow end-users larger screens with height/position adjustments.
- Ensure that renovations to existing structures do not create new barriers not previously identified.

Self Service Kiosks

Developmental Services of Leeds and Grenville does not use at this time Self Service Kiosks as a means to provide or access its services and supports. Hence, we have no obligations to follow under this section of the regulation.

Accessibility and Human Rights Training

Training on the Integrated Accessibility Standard Regulations, as well as, the Human Rights Code as it pertains to persons with disabilities will be provided to all employees and applicable volunteers. All persons who participate in developing the organizations policies and procedures; and all other persons who provide goods, services, or facilities on behalf of the organization shall receive training on the IASR and Human Rights. This training shall be appropriate to the duties and responsibilities of person and shall be provided as soon as practicable (at point of first hire). Developmental Services of Leeds and Grenville will provided additional training in respect to any changes to policies or procedures after the initial training and shall keep a record of the training provided under this section, including dates on which training is provided and number of provided.

Standard for Information and Communications

This standard outlines requirements for organizations to create, provide and receive information and communications in ways that are accessible for people with disabilities. This should help people with disabilities access information and communications that many of us rely on every day. Making accessibility a part of the way we send and receive information and communications will help to ensure people with disabilities have the same access to information as others, in a means appropriate to their needs. Under this section of the regulation organizations are required to address the following:
- DSLG
  - Accessible formats and communication supports

- Emergency procedure, plans or public safety information
- Accessible websites and web content
- Other Requirements for designated by Service Providers
  - Educational and Training resources and materials
  - Training to educators
  - Producers of education or training material
  - Libraries or educational and training institutions
  - Public libraries

Under this section organizations are required to provide accessible information and communication about the goods, services or facilities offered to customers, clients or others. Organizations must ensure that their feedback processes are accessible to persons with developmental disabilities by providing or arranging for accessible formats and communications supports, upon request. Organizations must make information about their feedback processes available to the public. The feedback process must allow for feedback in a variety of ways including in person, by telephone, by writing or via email. Every organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities. This must be done in a timely manner and take into account the person's accessibility needs due to disabilities and at a cost that is no more than the regular cost charged to other person. DSLG shall notify the public about the availability of accessible formats and communication supports (notice posted on website, on bulletin board in public area of office etc.) and is applicable only to information that the organization controls directly (all DSLG Information) or indirectly through contractual relationships (example DSLG website/ pamphlets and brochures).

Standard for Employment

Employment Standard, under the IASR, requires employers to provide for accessibility across all stages of the employment life cycle. By proactively removing barriers across the employment life cycle, employers can help to create workplaces that are accessible and which allow employees to reach their full potential. This standard applies to paid employees only; but as good business practice, employers may apply it to volunteers and other forms of unpaid work. The intent of this requirement is that all employers will notify internal and external job applicants that, where needed, accommodations for disabilities will be provided, on request, to support their participation in all aspects of the recruitment process.

Employers are required to notify their employees and the public about the availability of accommodations for disabilities, where needed, to support their participation in recruitment processes. Employers have the flexibility to consider their existing recruitment processes in determining how they provide notification. The requirements that are covered in this section are:
- Recruitment, assessment and selection
- Accessible formats and communication supports for employees
- Workplace emergency response information

- Documented individual accommodation plans
- Return to work process
- Performance Management
- Career development and advancement
- Redeployment

For detailed information about this component of the AODA, please see 2014 AODA Accessibility Training Document.

Human Rights Code

The Ontario Human Rights Code requires organizations to accommodate people with disabilities to the point of undue hardship. The Ontario Human Rights Code or other applicable legislation may require additional accommodation measures that go beyond or are different from the standards established by the regulations of the AODA. We need to know about the Ontario Human Rights Code because we all have rights and responsibilities to make sure that everyone is treated equally and without discrimination. Human Rights are for everyone. Human Rights issues touch our lives every day. We all have rights and responsibilities to make sure that everyone is treated equally and without discrimination. Developmental Services will provide training to all applicable individuals on Human Rights.

Standard for Transportation

The transportation standard will help transportation providers, as well as, municipalities, universities, colleges, hospitals and school boards make their services and vehicles accessible to persons with disabilities. Although Developmental Services of Leeds and Grenville is not a transportation provider, it is important for all staff to be aware of the intent of this regulation (See 2014 AODA Accessibility Training document).

Standard for Built Environment

The standard for Built Environment has not been fully released and therefore, this section of the Regulation will be updated upon release of the specific requirements.

Who participated in the development of this document

In preparing this year's Accessibility Plan, Developmental Service of Leeds and Grenville utilized several methods in which to identify accessibility barriers:

- The organization's 2012/13 Accessibility Plan was used to identify items that were already considered to have been a concern.
- The agency completed an Accessibility Self Audit/ Assessment that provided meaningful information about current accessibility conditions and future necessary developments.

- Staff personnel were consulted by the Manager of Quality Assurance as part of preparation for Focus Accreditation Domain Committee work. This committee made several contributions to the identifications of issues and potential ideas on how to rectify them.
- The organization's Health and Safety committee routinely identifies maintenance and property issues throughout the agency. This information was used to identify any issues that negatively impact the accessibility needs of the persons served by the agency.
- The organizations Management Team was requested to provide a review and identification of accessibility issues related to respective sites of service under their lead.
- The organization's leadership is brought up to speed on accessibility issues by personnel and by persons served on an ongoing basis. The issues anecdotally identified in this manner were also used in the creation of this plan.

Communication of this Document

The accessibility plan will be accessible to all staff of the organization once the agency finalizes its internal intra-net site associated with its website. It will also be published on the agency website and will be accessible to the public.

Awareness of the Accessibility Plan for 2013/18 will be included as part of the Employee Relation Committee Agenda Items regarding Accessibility.

Paper copies will be provide to all Management Teams and all managers will review it with all team members and available at the main reception office of Developmental Services of Leeds and Grenville. Copies will be made available to all those who request the plan.

Requirements

AODA Standard Specific	Year Required	Requirement in the Regulation	Action Required or Recommendations Made
Agency - Integrated Accessibility Standards Regulations	2014		
		Develop Statement of Organization commitment to IRA Standards	Please see IASR Commitment and Implementation Strategy for complete details of the requirements, timelines etc.
		Develop IASR Policy	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Develop Multi Year Accessibility Plan Policy	Change yearly accessibility plan to including all AODA standards and update accordingly.
		Publish Multi Year Accessibility Plans	Discuss with Geoff the need to make the Multi Year accessibility plan accessible to the public via DSLG website.
		Voluntary - Develop/ Modify	This requirement only applies to the Government

		existing Purchasing or acquiring goods, service or facilities Policy	of Ontario and the Legislative Assembly and designated public sector organizations.
		Address the Use of Self-Service Kiosks requirements (as applicable)	The agency currently does not use self-service kiosks.
		Training Requirements to Address Integrated Accessibility Standards Regulation and Human Rights Training requirements	Identification of who needs to be trained on IASR and Human Rights needs to be developed and approved of by the organization and included this requirement as part of all new staff/ designated volunteer orientations.
		Develop IASR / Human Rights training materials	Training package on IASR and Human Rights needs to be developed and approved of by the organization and included as part of all new orientations.
Information and Communications Standard	2014-2021		
		Develop statement committing to and planning for accessible Information and Communication.	Please see IASR Commitment and Implementation Strategy for complete details of the requirements, timelines etc.
		Develop Policy on Accessible Information and Communication	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Develop Policy on Accessible Formats and Communication Supports	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Develop/Integrate into existing Policy - Feedback process on Accessible Communication and Information	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Identify what agency documents need to be made accessible, prioritize and setup timeline for completion.	Administration to review all forms, documents etc., and submit listing of suggested documents to be converted to accessible format (including type).
		Develop/Integrate into existing Policy – Emergency Response procedures, plans or public safety information.	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written
		Develop Policy on Accessible Website and Website content.	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written
Employment Standard	2016		
		Develop statement of organizational commitment and accessibility achievement for employment standard	Please see IASR Commitment and Implementation Strategy for complete details of the requirements, timelines etc.
		Develop/Integrate into existing Policy to meet the obligations under the employment standard (Including the following below noted)	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Recruitment	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Employee Notifications	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Individual Accommodation Plans	Review current policies to see if IASR can be

			integrated into existing polices or if new policy needs to be written.
		Return to Work Process	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Performance Management, Career Development, Advancement and Redeployment	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Accessible Formats and Communication Supports	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
		Workplace Emergency Response Information	Review current policies to see if IASR can be integrated into existing polices or if new policy needs to be written.
Transportation Standard			
	This	Standard	Is Not Applicable To
Built Environment Standard			
	Standard	Requirements	Have Not Been Released

Follow-up

The Accessibility Plan will be reviewed by the Management team at least yearly and updated accordingly (5 year maximum). The Accessibility Plan will be available to stakeholders in and the agency will follow reporting requirements that are included under AODA. The report will be published on Developmental Services Website under a section on Accessibility.