



# AODA (Accessibility) Policy

CCASH Policy and Procedure Manual			Page 1 of 6
<b>Approved by:</b>	Executive Director	<b>Approval Date:</b>	12/08/2023

## PURPOSE

The purpose of this policy is to provide a clearly stated commitment to persons who identify having disabilities and set out the processes by which the Society will become barrier free and ensure compliance with *the Ontarians with Disabilities Act (ODA) 2001*, the *Accessibility for Ontarians with Disability Act (AODA)* and its *Customer Service Standard*. The [Accessibility & Accommodation in Employment Policy](#) sets out the Society's policy and procedures with respect to accessibility in employment.

The Catholic Children's Aid Society of Hamilton (CCASH) is committed to actively and continuously working towards cultivating a culture of inclusion. In doing so, we are committed to providing services and employment opportunities that are accessible for persons who identify as having disabilities. This commitment is consistent with the Society's Equity Statement and its Mission, Vision, Values and Guiding Beliefs, which are rooted in our Catholic faith, and our recognition of the sacredness of human life, and the dignity and worth of each individual.

All parties have a role in creating an equitable and inclusive environment, as well as in the accommodation process and the identification, removal and/or reduction of barriers.

This policy applies to staff, students, volunteers and resource foster care givers. Where applicable, the Society is in compliance with the CUPE Local 1797 Collective Agreement.

## POLICY

The Society ensures services and the work environment are provided in an accessible manner consistent with the *Accessibility for Ontarians with Disabilities Act* and its Standards for Customer Service.

Society policies, plans, training and capital improvements aim to ensure that persons with disabilities have an equal opportunity to access services. The Society will integrate practices and procedures into the provision of services and employment that enable persons with disabilities to obtain, use and benefit from services and employment at the Society.

All policies, procedures, programs and practices and any modification will respect the dignity and independence of persons with disabilities. To the extent required and feasible, accessible methods of communication with persons with disabilities will be made available.

In accordance with the *AODA's* Integrated Accessibility Standards Regulation, the Society's Accessibility Plan sets out enforceable accessibility standards in the areas of:

- Customer Service

<b>Catholic Children's Aid Society of Hamilton</b>	
AODA (Accessibility) Policy	Page 2 of 6
Approval Date: 12/08/2023	

- Information and Communication
- Employment
- Building Environment
- Transportation

Meeting the needs of persons with disabilities is based on continuous improvement. The Society's Accessibility Plan considers the needs of service recipients, children and youth, foster care providers, contractors, visitors, community professionals, volunteers and employees. The Plan will review barriers, training, communications, outreach and feedback.

The Society has established procedures for receiving complaints and feedback with respect to accessibility to services and its premises.

**PROCEDURE**

**General Procedures**

1. The Society will notify persons with disabilities about unintentional/unplanned disruptions to service and shall consider in its plans the provision of alternative means of service.
2. Training is provided to employees, volunteers and students who, on behalf of the Society, provides services and/or participate in developing policies, practices and procedures for the provision of services.
3. Outreach may occur to community representatives, to persons with disabilities, and to any support organizations who assist persons with disabilities. Accessible formats will be provided upon request to enable participation. Invitations may be offered to community representatives to participate in plans that respond to the needs and rights of persons with disabilities.
4. The [Accessibility \(AODA\) Statement](#) will be posted in a conspicuous place in the Society's premises and on the Society's public website and its internal intranet site available to staff and service recipients.
5. This policy, the *CCASH Accessibility Plan* and the [AODA Complaint & Feedback Form](#) are posted on the Society's web site. They are made available in an accessible format upon request. A hard copy of the Policy which outlines the complaint process will be retained at Reception and made available in an accessible format upon request.

**Leadership**

1. The Executive Director is responsible for providing overall direction to meet the Society's obligations and commitments with respect to the *AODA*.
2. Matters relating to the Society's responsibilities for compliance with the *AODA* are referred to the appropriate Director as determined by the nature of the matter.

---

Customer Service	Director of Protection Services Director of Permanency Services Director of Services and Equity
------------------	---

---

Information and Communication	Director of Fund Development and Communications
Employment	Director of Human Resources
Building Environment	Director of Finance and Corporate Services
Transportation	Director of Finance and Corporate Services

3. The Society’s Management Team shall:

- a. Ensure that all Society staff, volunteers, and foster care givers are annually trained in the proper and accepted approaches for interacting with persons with disabilities.
- b. Assist in the development and communication of the Accessibility Plan.
- c. Guide behaviours of staff, volunteers, and resource parents in their interactions with persons with disabilities consistent with the values of dignity and respect
- d. Review Agency policies, procedures and practices to ensure they are consistent with the principles of accessibility.
- e. As may be practical, make available assistive devices for staff with disabilities, and also for staff to interact with persons with disabilities.
- f. Identify issues or barriers that may become apparent over time.
- g. Assist in the resolution of complaints.

4. The Society’s AODA Committee:

- a. Consists of the Director of Finance and Property, Manager of IT, Director of Service, Communications Coordinator, Director of Human Resources, CUPE 1797 President.
- b. Provides support to Senior Leadership for AODA compliance related matters.
- c. Manages and maintains the Society’s AODA Activity Plan.
- d. Makes recommendations for changes to all AODA policy and procedures during the AODA review process.
- e. Ensures compliance of AODA policies and procedures for the Society.

**Training – Staff, Students, Volunteers and Foster Care Givers**

1. Mandatory annual training will include:

- The purposes of the *Accessibility for Ontarians with Disabilities Act*.
- Awareness programs consistent with plans and objectives.
- Society policies, practices and procedures relating to client service standards.
- How to communicate and use equipment or devices with persons with different disabilities (including the role of service animals).
- The role of a support person.
- How to respond if a person is having difficulty in accessing the premises or services or pursuing employment opportunities.
- What to do if a complaint is brought forward by a person with a disability.

<b>Catholic Children's Aid Society of Hamilton</b>	
AODA (Accessibility) Policy	Page 4 of 6
Approval Date: 12/08/2023	

- Where complaint/feedback forms are located and how to assist individuals to complete the form, if requested.

### **Labour Relations**

1. The Union endorses and agrees to work cooperatively in achieving the aims of the *ODA 2001* and *AODA 2005*. This policy does not supersede any term of the Collective Agreement.
2. The Union shall be informed of any provisions of the Collective Agreement that may be in conflict with the aims of the *AODA*. Any modifications to the Collective Agreement shall be by mutual agreement in writing by the parties or at times when collective bargaining occurs.

### **Addressing Barriers to Accessibility**

1. Initiatives will include:
  - a. Awareness promotion, training, related websites.
  - b. Renovations to building or property improvements.
  - c. Revision to policies and procedures that might unintentionally create barriers.
  - d. Feedback from staff, service recipients, and community organizations.
  - e. Information gathered from AODA complaints and feedback.
  - f. Recommendations and information from audit mechanisms.

### **Support Persons**

1. A support person means an individual who accompanies a person with a disability in order to help with communications, mobility, personal care or medical needs or with access to services.
2. A person with a disability who is accompanied by a support person will not be prevented from having access to their support person while on the premises.
3. The Director of Services is to be immediately informed in any instance where a support person is denied access.
4. Confidentiality of service recipient matters shall be preserved to the extent possible. Any issues regarding confidentiality shall be resolved without limiting the person accompanied by a support person from access to Society services or premises.

### **Use of Service Animals**

1. An animal is a service animal when it is readily apparent that the animal is used for reasons related to the person's disability or if the person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to the disability.
2. If a person with disability is accompanied by a guide dog (as per *Blind Persons' Rights Act*) or other service animal, that person is permitted to enter into areas accessible to the public and to keep the animal with them unless the animal is otherwise excluded by law from the premises, e.g., food preparation.

<b>Catholic Children's Aid Society of Hamilton</b>	
AODA (Accessibility) Policy	Page 5 of 6
Approval Date: 12/08/2023	

3. If the animal is excluded by law, the Society shall ensure other measures are taken to enable the person to obtain and use the services offered by the Society.
4. The Society will consider any other person who may have an acute sensitivity or an allergic reaction to a service animal. Reasonable solutions considering the needs of both shall be explored.

### **Communications**

1. Communications with persons with disabilities shall be in a manner that takes into consideration any accessibility needs and respects their dignity. Accessible methods of communication and technology can be provided upon request and as needed.
2. If a person with disability has requested a preferred mode of communication which is not available, staff will, in coordination with their supervisor, attempt to find alternative accessible forms of communication that respond to the person's needs, respects the dignity of the individual and is acceptable to the person with a disability.
3. Literature offered to the public shall be in suitable print size and be offered in an electronic format on the website, when possible.
4. The Society's website shall provide appropriate fonts and sizes of print. The website shall permit persons with disabilities to adjust print size and background colours. Audio enhancements of any text may be provided.
5. Signs and notices in areas open to the public shall have appropriate size print and be placed at locations and levels accessible to individuals confined to wheelchairs.
6. Other assistive devices shall be provided to assist in communication and the provision of services as required and necessary.

### **Temporary Disruption in Service**

1. The Society may utilize one or all of the following processes to notify persons with disabilities when services are temporarily disrupted:
  - Post a notice on the website; at the public entrance, reception, and the telephone answering system or use any other acceptable means including announcing the disruption through local media.
  - Notices shall include the reason, the expected duration, and any alternatives available such as contacting Emergency After Hours Service.

### **Confidentiality**

1. Persons with disabilities may, if necessary, be informed that personal and confidential matters related to their disability will not be unnecessarily disclosed to others.

<b>Catholic Children's Aid Society of Hamilton</b>	
AODA (Accessibility) Policy	Page 6 of 6
Approval Date: 12/08/2023	

### **Feedback and Complaint Process**

1. Feedback or complaints regarding the way service to persons with disabilities has occurred can be made by completing the [AODA Complaint & Feedback Form](#). The Form is available on the Society's website, or in hard copy from the Society's Receptionist. Assistance will be offered to persons with disabilities who may not be able to respond in a written format.
2. The Society Communications Coordinator will receive complaints and feedback and forward them as per the Table above to respond and resolve the complaint.
3. The responding Director (as per the table above) shall acknowledge receipt of a complaint within five days. They will provide a response to a complaint not later than two weeks from the date the complaint was made unless extenuating circumstances require a longer period.
4. The Society may voluntarily participate in any mediation initiative with the goal of resolving a complaint. Nothing herein requires the Society to engage in voluntary mediation if participation may be prejudicial to the Society in any legal proceeding.
5. Ontario Human Rights Commission complaints may involve a Society appointed legal representative.

### **REFERENCE**

Ontarians with Disabilities Act 2001  
Accessibility for Ontarians with Disability Act 2005  
Blind Persons Act 1990  
CCASH AODA Statement  
CCASH Equity Statement