

ACCESSIBILITY POLICY	
Classification: Human Resources	Effective Date: May 18, 2018
Approval Authority: Board of Directors	Latest Revision: December 4, 2017, May 2018, March 30, 2023
Implementation Authority: Executive Director	

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1.0 PURPOSE

The purpose of this policy is to ensure that the New Canadians Centre Peterborough (hereby referred to as “the Organisation”) complies with and is committed to the principles of the Government of Ontario’s Accessibility for Ontarians with Disabilities Act and the Ontario Human Rights Code.

2.0 SCOPE

The policy applies to any employees, board members, and volunteers and relates to any individual who requires accommodation while accessing services or otherwise interacting with the Organisation.

3.0 DEFINITIONS

Accommodation:

Modifications or adjustments to the tasks, environment or to the way things are usually done that enable people with disabilities to work productively, live independently, and access services open to non-disabled people.

Assistive Devices:

An assistive device is a piece of equipment a person with a disability uses to help them with daily living (for example, a wheelchair, screen reader, hearing aid, cane or walker, an oxygen tank).

Disability:

“Disability” means,

(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”).

Undue Hardship:

An action requiring significant difficulty or expense when considered in light of cost, outside sources of funding (if any) and health and safety requirements (if any). Undue hardship is determined on a case-by-case basis.

5.0 RELEVANT LEGISLATION

- Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11
- Human Rights Code, R.S.O. 1990, c. H.19

6.0 RESPONSIBILITIES

Executive Director

The Executive Director or delegate is responsible for monitoring and ensuring compliance with relevant legislation, including the AODA and Ontario Human Rights Code and ensuring that all persons with disabilities are treated in a manner that meets the expectations of the Policy. This responsibility includes:

- Selecting adequate and appropriate training;
- Ensuring all employees and volunteers complete required training;
- Ensuring that programs and services are delivered in accessible locations, or that alternate locations are provided for meetings;
- Reviewing all feedback provided about the way the Organisation provides services.

Director of Community Development

The Director of Community Development or delegate is responsible for providing notice of temporary disruptions of services and ensuring communications products meet the expectations of this Policy.

Director of Corporate Services

The Director of Corporate Services will ensure that all employees working at the front desk are trained on the use of the elevator. They will also ensure that any necessary individual workplace emergency response plans are in place.



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Volunteer Administrator

The Volunteer Administrator is responsible for ensuring all volunteers complete required training.

7.0 POLICY STATEMENT

The Organisation 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.

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

The Organisation 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. We are committed to excellence in serving and providing goods, 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.

As such, the Organisation embraces its duty to accommodate and is committed to ensure that all staff, clients and volunteers are treated with respect and dignity, and provided with the necessary accessibility accommodations and supports to thrive in their roles within the boundaries of causing undue financial hardship to the Organisation.

7.1 Reporting

The Executive Director or delegate is responsible for monitoring and ensuring compliance with relevant legislation, including the AODA and Ontario Human Rights Code and ensuring that all persons with disabilities are treated in a manner that meets the expectations of the Policy. The Executive Director will update the Board on any changes in legislative compliance requirements and any instances of non-compliance.

ACCESSIBILITY GUIDELINES & PROCEDURES	
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8.0 GUIDELINES

All accessibility accommodation decisions will be considered within the framework of existing provincial and federal legislation with specific reference to the OHRC and the AODA standards. When there is a discrepancy within existing regulations, the regulation offering the higher level of accessibility will take precedence.

The Duty to Accommodate as outlined in the OHRC will be followed to the point of causing undue hardship, which takes into consideration:

- cost
- access to outside sources of funding, if any
- health and safety requirements, if any.

The Organisation as of 2023 is considered to be a 'Small Organisation' as defined by the AODA with under 50 employees and the following procedures meet or exceed the requirements that pertain to this designation.

Any policy of the NCCP that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

9.0 PROCEDURES

9.1 Training

The Organisation will provide Accessible Customer Service training to all employees, volunteers and others who deal with the public or other third parties on their behalf. The Executive Director or delegate will ensure this training is provided to all new employees within 3 months of their date of hire; the Volunteer Administrator or delegate will ensure that this training is provided to all volunteers before volunteer duties commence. Employees and volunteers will also receive any necessary additional training on accessibility that relates to their specific roles.

Training for employees will take place via the HR Live platform with training records being maintained on that platform as well.

Training for volunteers and Board members will consist of the Customer Service Standard module at the website www.accessforward.ca. Volunteers and Board members must submit the



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certificate of completion to the appropriate person: Board member to the Executive Director, volunteers to the Volunteer Administrator.

9.2 Accessible Customer Service

The use of 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.

The Executive Director will ensure that employees are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing the Organisation's services.

Elevator

An elevator is available at the Organisation's main office. The Director of Corporate Services is responsible for ensuring all employees who work at reception are trained in the use of the elevator.

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 for 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. The Organisation welcomes people with disabilities and their service animals. Service animals are permitted on the parts of our premises that are open to the public.

Support Persons

A person with a disability who is accompanied by a support person will be encouraged to have that person accompany them when receiving services. No fees will be charged to a support person when accompanying a person with a disability on trips, events, or activities.

9.3 Information and Communication

Accessible formats

When a request for accommodation is received by any employee or volunteer, they will consult with the individual to determine their accessibility needs. If the employee or volunteer is unable



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or unsure if the individual's accessibility needs can be accommodated, the employee shall consult with their direct supervisor. The supervisor will determine the most appropriate accessible format or communication support depending on the accessibility needs of the person and the capability of the Organisation to deliver.

Accessible formats and communication supports must be provided in a timely manner and at a cost that is not more than the regular costs charged to other people.

Examples of alternate formats and communication supports that may be considered include:

- Reading written information to a person directly
- Large print
- Text transcripts of audio or visual information
- Handwritten notes instead of spoken word
- Information written in plain language
- An electronic document formatted to be accessible for use with a screen reader
- Material translated into another language
- Audio recording of written information

If the Organisation cannot convert requested material, the supervisor making that decision will provide the individual making the request with an explanation as to why the information or communications are unconvertible, and a summary of the information or communications (e.g. a written or verbal description for visual content).

The Organisation will strive to meet internationally-recognized Web Content Accessibility Guidelines (WCAG) 2.0 Level AA website requirements.

Notice of temporary disruptions

In the event of a planned or unexpected disruption to services or facilities, the Organisation will notify employees, clients, and volunteers promptly. Depending on the extent of the disruption, the communication may be made by the Executive Director or designate, or the employee responsible for a specific program or service.

If all affected individuals cannot be contacted directly, a notice will be placed on the main door of the affected office(s) and will include information about the reason for the disruption and its anticipated duration. This information will also be distributed, where appropriate, via social media and/or email.

Where the Organisation is aware of a need for accommodation, all reasonable attempts will be made to make this information available in alternate formats (e.g. large print, etc.).

Feedback

Individuals who wish to provide feedback on the way the Organisation provides services to people with disabilities can do so through the Organisation's website, the general Organisational email, or by contacting any employee or volunteer of the Organisation through email, phone, or personally.



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Individuals who wish to provide feedback may also contact the designated Feedback Officer at feedback@nccpeterborough.ca.

All feedback will be responded in a manner outlined in the Feedback Policy.

Feedback mechanisms used by the Organisation, such as evaluations or surveys, must be made accessible, upon request, through the use of alternate formats or using communication supports.

9.4 Employment

Accessible Recruitment

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.

Informing Employees of support

The Executive Director, or delegate, will inform employees of any policies or changes to policies that impact support for employees with disabilities as soon as is practicable after they begin their employment or within one calendar week of any policy change, respectively.

The Executive Director, or delegate, will inform all new employees of any available accessibility supports.

The Organisation will work with employees to adjust or modify the work environment or method of completing tasks in order to satisfy the accommodation required, based on any request involving protected Ontario Human Rights Code grounds, and/or the AODA

When needed, we will work with employees to develop individual accommodation plans.

When needed, and working with the affected employee(s), we will develop return to work plans 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 employee

Workplace Emergency Response Plan

The Director of Corporate Services will provide individualized workplace emergency response information to employees and volunteers with disabilities if:

- The disability makes it necessary; and
- The Organisation is aware of the need



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The Director of Corporate Services, with the employee's or volunteer's consent, will share the information with anyone designated to help them in an emergency.

This information will be reviewed when:

- The employee or volunteer moves to a different location in the Organisation; or
- The employee or volunteer's overall accommodation needs or plan are reviewed; or
- The Organisation reviews its emergency response procedures

RELATED POLICIES

- Human Resources Policy #1 Recruitment, #2 Terms and Conditions of Work
- Feedback Policy
- Anti-Racism & Anti-Oppression Policy

HISTORY

This policy replaces the Accessible Customer Service Policy