**ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES**

**MULTI-YEAR ACCESSIBILITY PLAN**

**PART 1: INTRODUCTION AND BACKGROUND INFORMATION**

Bruce Grey Child and Family Services (BGCFS) originated in 2012 following the merger of the Children’s Aid Society of Owen Sound and the County of Grey and the Children’s Aid Society of the County of Bruce. BGCFS is a child welfare organization.

Bruce Grey Child and Family Services embraces respect as a core value. We strive to "live our values and have a culture of service, engagement and empowerment." Our organization is inclusive and welcomes and respects diversity. We make every effort to be an employer of choice for all people.

Executive Director, Phyllis Lovell

**BGCFS’ Commitment to an Inclusive and Accessible Work Environment**

BGCFS is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Integrated Accessibility Standards Regulation* (the “IASR”) of the *Accessibility for Ontarians with Disabilities Act* (“AODA”), and the *Human Rights Code*

**BGCFS’ Commitment to Accommodation**

BGCFS is committed to making every reasonable effort to accommodate people with disabilities, provided such accommodation does not cause BGCFS undue hardship.

**PART 2: ACCESSIBILITY AT BGCFS**

**Accessibility Plan:**

The AODA seeks to provide a fully accessible Ontario by 2025. Consistent with this objective, there are many obligations placed on organizations, including BGCFS, to ensure their workplaces and services are fully accessible to the public and employees, including persons with disabilities.

The IASR requires every employer with 50 or more employees, to develop and post a Multi-Year Accessibility Plan on their website by January 1, 2014. In accordance with the IASR, BGCFS’ multi-year accessibility plan outlines the organization’s comprehensive strategy to prevent and remove barriers to accessibility.

The objective of the Multi-Year Accessibility Plan is to support BGCFS compliance with the AODA and the IASR and BGCFS commitment to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity.

**Barrier Assessment – Methodology:**

In accordance with the AODA and with BGCFS commitment to treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for BGCFS people to develop to their full potential, our plan seeks to prevent and remove barriers to accessibility for persons with disabilities.

A “barrier” is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. Typical barriers to accessibility encountered by persons with disabilities include Physical / Architectural, Attitudinal, Informational/Communication, Systemic, and Technological barriers.

**Barrier Definitions:**

1. **Physical/Architectural**: design elements of a building or a space that cause problems for persons with disabilities.
2. **Attitudinal:** our perceptions of how we interact with persons with disabilities.
3. **Informational/Communication:** things/situations that make it difficult for a person with a disability to give, receive or understand information.
4. **Systemic:** organizational policies or practices that (often unwittingly) restrict the participation of persons with disabilities.
5. **Technological:** poor or non-existent technology system that can prevent people from accessing information. Common tools like computers, telephones and other aids can all present barriers if they are not set up or designed with accessibility in mind.

**PART 3: MOVING TOWARD ACCESSIBILITY**

**BGCFS’ Accomplishments and Progress to Date:**

Consistent with BGCFS’ objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for BGCFS people to develop to their full potential, we have taken various steps to foster an accessible organization and workplace.

Examples of the Diversity and Inclusion’s accomplishments include:

* Accommodation offered to job applicants for interviews
* Accommodation offered for all BGCFS hosted events
* All staff have had AODA training
* New buildings and renovations to existing work spaces are AODA compliant
* AODA Standards and Procedures have been developed and are available
* Accommodation offered for all BGCFS hosted events
* **AODA Project Team: Created**
* Cross-functional team created to ensure BGCFS compliance with AODA requirements
* **AODA Customer Service Standard Requirements:**
* Creation and posting of customer service policy, procedures and good practices
* Customer Service Training – Mandatory training was completed by all existing BGCFS staff.
* Customer Service Training is also part of mandatory component on-boarding for all new hires in Ontario.
* Customer Service Feedback - Our Standard and Procedure is posted on the website
* **AODA Individual Emergency Evacuation Procedures:**
* All existing and new employees who require an individual workplace emergency response plan are provided with an individual plan that takes into account their disability.
* All BGCFS staff are made aware of the availability of individual emergency evacuation plans during the on-boarding process through training.
* Information on how to obtain individual emergency evacuation plans are posted on the organization’s internal website and throughout the buildings.
* Return to Work and Accommodations plans identify any emergency evacuations plans that are required
* Identified staff have an Individual Emergency Evacuation plan where required
* **Disability Management and Return to Work Programs – ongoing**
  + BGCFS has a comprehensive and structured disability leave management program, return to work and accommodation review process.

**PART 4: BGCFS MULTI-YEAR ACCESSIBILITY PLAN**

**Section I: General Requirements**

| **Initiative** | **ISAR Requirement** | **Action** | **Status** | **Required Compliance Date** |
| --- | --- | --- | --- | --- |
| **1.1 Establishment of Accessibility Policies** | Every obligated organization shall develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting its requirements under the accessibility standards referred to in this Regulation. | * Policy complete and posted on BGCFS external website and internal iConnect intranet. | Completed | Jan. 1/2013 |
| **1.2 Accessibility**  **Plans** | Large organizations shall:   1. establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization‘s strategy to prevent and remove barriers and meet its requirements under this Regulation; 2. post the accessibility plan on their website, if any, and provide the plan in an accessible format upon request; and 3. review and update the accessibility plan at least once every five years. | * Established an AODA project team to understand requirements of the IASR * Creation of BGCFS Accessibility Plan * Team lead responsible for creation of Accessibility Plan * A leader attended a workshop March 26, 2013 to inform Accessibility Plan development * Identified barriers * AODA committee to meet ongoing until compliance deadlines have all been met | Completed | Jan. 1/2013 |
| **1.3 Training** | Every obligated organiza-tion shall ensure that training is provided on the requirements of the accessibility standards referred to in this Regulation and on the *Human Rights Code* as it pertains to persons with disabilities to,   * + all employees and volunteers;   + all persons who participate in developing the organization‘s policies; and   + all other persons who provide goods, services or facilities on behalf of the organization. | * Establishment of AODA cross- functional team to understand training requirements pursuant to the IASR * Reviewed current training to determine whether existing training could be leveraged for training required by the IASR * Determine budget to provide training * Assess training needs (*eg.* separate training for managers and employee levels) * Determine vehicle to deliver training (*eg.* online) * Training will be mandatory and training will be available online where possible * Training to incorporate accessible format – review training modes and materials to determine what accessible formats currently exist and what accessible functions may be incorporated in the training design * Determine mechanism for managing and tracking completion of training by BGCFS Staff | Completed | Jan. 1/2015 |

**Section II – Information and Communications Standards**

| **Initiative** | **ISAR Requirement** | **Action** | **Status** | **Required Compliance Date** |
| --- | --- | --- | --- | --- |
| **2.1 Feedback** | Every obligated organization that has processes for receiving and responding to feedback shall ensure that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports, upon request. | Through the AODA project team:   * Engage all groups who provide surveys to make them aware of IASR requirements and process for requests for accessible formats * Determine all current feedback mechanisms at BGCFS * Review processes to ensure accessible formats and current accessibility features are available * Review/Update current processes where needed * As needed, update current Standards and Procedures for requesting accessible formats– including alternative methods of feedback if what is in place or is available doesn’t meet the needs of the individual * Develop understanding of current accessible formats, information, communication and technology tools available at BGCFS to adequately respond to requests for accessible formats that take into consideration the requestor’s disability needs. | Completed | Jan. 1/2014 |
| **2.2 Accessible Formats & Communication Supports** | 2.2.1 Except as otherwise provided, every obligated organization shall upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,   * 1. in a timely manner that takes into account the person‘s accessibility needs due to disability; and   2. at a cost that is no more than the regular cost charged to other persons. | * Review accessible formats and communication, technology supports currently available at BGCFS * Review process for requesting accessible formats/communication supports * As needed, update current Standards and Procedures for requesting accessible formats, including alternative methods of feedback if what is in place or is available doesn’t meet the needs of the individual * Develop communication strategy for educating BGCFS staff and service users on the availability of and process for requesting accessible formats/communication supports | Completed | Jan. 1/2015 |
|  | 2.2.2 The obligated organization shall consult with the person making  the request in determining the suitability of an accessible format or communication support. | * Review/update of current Accommodation Standard and Procedure * Develop a process for responding to a request | Completed  Ongoing | Jan. 1/2015 |
|  | 2.2.3 Every obligated organization shall notify the public about the availability of accessible formats and communication supports. | * Incorporate language in materials and website to advise that, in accordance with AODA, accessible format may be made available on request | In Progress | Jan. 1/2016 |
| **2.3 Accessible Websites & Web Content** | Large organizations shall make their internet websites and web content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG)2.0, initially at Level A and increasing to Level AA, and shall do so in accordance with the schedule set out in this section. | * Conduct an assessment current web functionality to ensure compliance and adequate accessibility features | In Progress | Jan. 1/2021 |

**PART III – Employment Standard**

| **Initiative** | **ISAR Requirement** | **Action** | **Status** | **Required Compliance Date** |
| --- | --- | --- | --- | --- |
| **3.1 Recruitment, General** | Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment processes. | * Review of all mechanisms for posting BGCFS positions (website, print posting) * Incorporate language on postings and BGCFS websites to make applicants (internal / external) aware that in accordance with AODA accommodation is available | In Progress | Jan. 1/2016 |
| **3.2 Recruitment, Assessment or Selection Process** | 3.2.1 During a recruitment process, an employer shall notify job applicants, when they are individually selected to participate in  an assessment or selection process, that accommoda-tions are available upon request in relation to the materials or processes to be used.  3.2.2 If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant‘s accessibility needs due to disability. | * Incorporate language in all notifications to applicants for interview (email, letter, phone), that in accordance with AODA, accommodation is available upon request * Review of recruitment process (tests, assessment, rooms) to ensure barriers may be removed or accessible features provided, upon request in accordance with AODA | In Progress | Jan. 1/2016 |
| **3.3 Notice to Successful Applicants** | Every employer shall, when making offers of employ-ment, notify the successful applicant of its policies for accommodating employees with disabilities. | * Incorporate in offer letter a section regarding BGCFS accessibility policies and where to access additional information on BGCFS’ internal and external website | In Progress | Jan. 1/2016 |
| **3.4 Informing Employees of Supports** | 3.4.1 Every employer shall inform its employees of its policies used to support  its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee‘s accessibility needs due to disability. | * Develop change and communication strategy to educate and advise BGCFS staff on BGCFS accessibility policies, plan and processes. | Completed | Jan. 1/2016 |
|  | 3.4.2 Employers shall provide the information required under this section to new employees as  soon as practicable after they begin their employment. | * Accessibility Standards and Procedures shall be incorporated into new employee orientation passport. | Completed | Jan. 1/2016 |
|  | 3.4.3 Employers shall provide updated informa-tion to its employees whenever there is a change to existing policies on the provision of job accommo-dations that take into account an employee‘s accessibility needs due to disability. | * Develop process and strategy to communicate any policy changes by email and iConnect posting on website | In Progress | Jan. 1/2016 |
| **3.5 Accessible Formats and Communication Supports for Employees** | 3.5.1 In addition to its obligations under Section  12, where an employee  with a disability so requests it, every employer shall consult with the employee to provide or arrange for the provision of accessible formats and communica-tion supports for,   * 1. information that is needed in order to perform the employee‘s job; and   2. Information that is generally available to employees in the workplace. | * Educate employees and supervisors on the availability of accessible format and communica-tion supports; in accordance with AODA * Educate employees and supervisors on process for requesting accessible formats and communica-tion supports * Develop a plan for providing accessible formats of generally available information | In Progress | Jan. 1/2016 |
|  | 3.5.2 The employer shall consult with the employee making the request in determining the suitability of an accessible format or communication support. | * Develop a process for consulting with employees to determine accommodation needs * Develop a process for advising employee of solution | In Progress | Jan. 1/2016 |
| **3.6 Workplace Emergency Response Information** | 3.6.1 Every employer shall provide individualized workplace emergency response information to employees who have a disability, if the disability  is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee‘s disability. | * Established process to provide staff who request, or for whom BGCFS is aware of the need for accommodation due to the employee’s disability, to receive individualize workplace emergency response information | Completed | Jan. 1/2013 |
|  | 3.6.2 If an employee who receives individualized workplace emergency response information requires assistance and with the employee‘s consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee. | * Ensure BGCFS process for creating Individualized Workplace Emergency Response Information includes a mechanism to obtain consent from the BGCFS person to share the information with those designated to provide assistance in the event of an emergency. | Completed | Jan. 1/2013 |
|  | 3.6.3 Employers shall provide the information required under this section as soon as practicable  after the employer becomes aware of the need for accommodation due to the employee‘s disability. | * Upon request, supervisor and HR supervisor will work with the individual who requires accommodation, to provide Individual Workplace Emergency Response Information as soon as possible | Completed | Jan. 1/2013 |
|  | 3.6.4 Every employer shall review the individualized workplace emergency response information,   * 1. when the employee moves to a different location in the organization;   2. when the employee‘s overall accommodations needs or plans are reviewed; and   3. when the employer reviews its general emergency response policies. | * BGCFS process for creating individualized Workplace Emergency Response Information includes guidelines for when plans and information are to be reviewed due to a move, or change in accommodation needs. | Completed | Jan. 1/2013 |
| **3.7 Documented Individual Accommodation Plans** | 3.7.1 Employers, other than employers that are small organizations shall develop and have in place a written process for the develop-ment of documented individual accommodation plans for employees with disabilities. | * Review of current accommodation standards and procedures   • Develop and operationa-lize a standard process for the development of individualized accommodation plans; in accordance with AODA | Completed | Jan. 1/2016 |
|  | 3.7.2 The process for the development of documented individual accommodation plans shall include the following elements:   1. The manner in which an employee requesting accommodation can participate in the development of the individual accommoda-tion plan. 2. The means by which the employee is assessed on an individual basis. 3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer‘s expense, to determine if accommodation can be achieved and, if so, how accommodation can be achieved. 4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan. 5. The steps taken to protect the privacy of the employee‘s personal information. 6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done. 7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee. 8. The means of providing the individual accommodation plan in a format that takes into account the employee‘s accessibility needs due to disability. | * Create a Standard and Procedure for the development of documented plans that will incorporate the following elements:   + - Manner in which employee can request     - Under which circumstances medical is required     - Who will be assessing the medical provided     - Accommodation Plans will incorporate confidentiality requirements and outline when, to whom (supervisor, Morneau Sheppell) and what information may be shared     - Educate BGCFS staff and     - Develop change and communication plan to support awareness of process for, and availability of, individual accommodation plans in accordance with AODA     - Ensure supervisors understand the Accessibility policies and Standards and Procedures for requesting individual plans accommodation plans in accordance with AODA | Completed | Jan. 1/2016 |
| **3.8 Return to**  **Work Process** | 3.8.1 Every employer, other than an employer that is a small organization,   * 1. shall develop and have in place a return to work process for its employees who have been absent from work due to a disability and require disability- related accommodations in order to return to work; and   2. shall document the process. | * Update and document return to work process based on employee needs and compliance requirements | Completed | Jan. 1/2015 |
|  | 3.8.2 The return to work process shall,   * 1. outline the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and  1. use documented individual accommoda- tion plans, as part of the process. |  | Completed | Jan. 1/2015 |
|  | 3.8.3 The return to work process referenced in this section does not replace or override any other return to work process created by or under any other statute. |  | Completed | Jan. 1/2015 |
| **3.9 Performance**  **Management** | An employer that uses performance management in respect of its employees shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with  disabilities. | * Assess current performance review processes to ensure accessibility features are incorporated (*i.e.*, forms accessible, conversations in plain text). * Ensure updated/new performance manage-ment processes to be rolled out incorporate accessibility features * Ensure training or communications to performance managers provides awareness on effective communica-tion strategies, timing to allow for employees to review and understand feedback prior to meeting, and reasonable accommodation | Completed but under Review | Jan. 1/2015 |
| **3.10 Career Development & Advancement** | An employer that provides career development and advancement to its employees shall take into account the accessibility needs of its employees with disabilities as well as any individual accommoda-tion plans, when providing career development and advancement to its employees with disabilities. | * Review of current training and profes-sional development materials to determine accessibility features * Ensure all future developed training and materials are developed with accessibility features in mind * Ensure promotion criteria, practices and processes take into account individual accommodation needs and plans in accordance with AODA. * Track career progression of workers with disabilities. | Completed | Jan. 1/2015 |
| **3.11**  **Redeployment** | An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities. |  | Completed | Jan. 1/2015 |

**PART 5: CLOSING STATEMENTS**

In accordance with the AODA and with BGCFS objective of treating all people in a way that allows them to maintain their dignity and independence while creating an inclusive work environment for BGCFS people to develop to their full potential, the Multi-Year Accessibility plan is posted on BGCFS website and will be reviewed and updated at least annually.

**For the public:**

If you have any questions, or have feedback related to BGCFS Multi-Year Accessibility Plan, please email hrmailbox@bgcfs.ca or contact Chad Zimmerman at 1-877-552-4453 ext 4126

**For BGCFS staff:**

If you have any questions, or have feedback related to BGCFS Multi-Year Accessibility Plan, please email [hrmailbox@bgcfs.ca](mailto:hrmailbox@bgcfs.ca) or contact Chad Zimmerman at 1-877-552-4453 ext 4126