

### 1.0 Purpose

The purpose of this Roots of Empathy Integrated Accessibility Standards Regulation Policy (the "Policy") is to set out how Roots of Empathy achieves and will achieve accessibility through meeting the requirements of Ontario Regulation 191/11 – Integrated Accessibility Standards Regulation (the "IASR").

The IASR establishes the accessibility standards and compliance timeframes for each of information and communications, employment, transportation and public spaces.

The requirements in the standards set out in the IASR are not a replacement or a substitution for the requirements established under the Human Rights Code.

This Policy applies to all departments of Roots of Empathy.

This Policy is not intended to replace or supersede the Roots of Empathy Accessibility Guidelines - Customer Service Policy, required by Ontario Regulation 429/07.

This Policy will be reviewed and amended, as required, if and when additional accessibility related regulations are enacted by the Government of Ontario and if and when changes are made to the legislative framework governing accessibility.

This Policy is being made publicly available on the Roots of Empathy organization's websites and will be provided in an accessible format upon request.

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

### 2.0 Statement of Organizational Commitment

Roots of Empathy is committed to meeting the objectives and requirements outlined in the IASR under the Accessibility for Ontarians with Disabilities Act, 2005 (the "AODA") and meeting the needs of people with disabilities, in a timely manner, through the implementation of the requirements of the AODA.

Roots of Empathy is committed to excellence in providing service to all our participants and stakeholders including people with disabilities. The following policies, procedures and practices are guided by the fundamental principles underlying the Customer Service Standard. We are committed to ensuring that this policy is rigorously observed by all employees and any third party that provides goods and services on our behalf.

The objective of this policy is to provide a framework through which we can achieve service excellence for people with disabilities. We are committed to providing a respectful, welcoming and inclusive environment to all individuals who seek access to our goods and services.

### 3.0 Definitions

- a) “**Accessible Formats**”: includes but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities;
- b) “**Accommodation**” means the special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person’s needs;
- c) “**Communication Supports**” includes, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications;
- d) “**Disability**”, as defined by the AODA and the Ontario Human Rights Code, is:
  - 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,
  - a condition of mental impairment or a developmental disability,
  - a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,
  - a mental disorder, or
  - an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.
- e) “**Information**” includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning
- f) “**Third Party**” means a representative of a business or organization who is receiving Roots of Empathy goods or services or acting in an official capacity

### 4.0 General Provisions

#### 4.1 Multi Year Accessibility Plan and Accessibility Reports

- Roots of Empathy shall establish, implement, maintain and document a Multi Year Accessibility Plan by January 1, 2015. The Multi Year Accessibility Plan will outline the Roots of Empathy strategy to prevent and remove barriers and meet the requirements under the IASR.
- The Multi Year Accessibility Plan will be posted on the Roots of Empathy organization's websites and will be provided in an accessible format upon request.
- The Multi Year Accessibility Plan will be reviewed and updated at least once every 5 years.
- Roots of Empathy shall file an accessibility report with the Province as required.
- Roots of Empathy will provide training to employees, volunteers and others within Ontario who deal with the public on their behalf. This training will be provided to staff as part of their orientation training at the outset of their employment. Training will be refreshed when changes are made to the Roots of Empathy policies
- Training will include:
  - An overview of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the customer service standard.
  - The Roots of Empathy plan related to the customer service standard.
  - 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; if applicable.
  - What to do if a person with a disability is having difficulty in accessing our organization's goods and services.

### 5.0 Accessible Information and Communications Standards

#### 5.1 Accessible Emergency Information

- Emergency procedures, plans or public safety information, that is publicly available, shall be provided in an accessible format or with appropriate communication supports, as soon as practicable upon request.

#### 5.2 Feedback Process

- Individuals who wish to provide feedback on the way Roots of Empathy provides goods and services to people with disabilities can contact Roots of Empathy at [mail@rootsofempathy.org](mailto:mail@rootsofempathy.org) or toll-free at 1-866-766-8763.
- All feedback will be tracked and logged and will be kept in strict confidence in the Communications Department. Feedback will be used to improve customer service.
- The author of the feedback will be provided a response; as applicable, as defined by the legislation in the format requested (or the most appropriate form if no request was made). Individuals can expect to hear back in 10 business days. Complaints will be addressed according to our organization's regular complaint management procedures

#### 5.3 Accessible Formats and Communication Supports

- This policy and any corresponding practices and procedures will be made available to any person on request. It will also be posted in a conspicuous place in our work environment.
- Upon request, we will provide this Policy and any other forms created pursuant to the Customer Service Standard in a format that takes into account the disability of the person submitting the request.
- We will communicate with people with disabilities in ways that take into account their disability.
- 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.
- A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises.

### 5.4 Accessible Websites and Web Content

- Roots of Empathy shall make its internet website and web content conform to World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, initially at Level A and increasing to Level AA. By January 1, 2021 all internet website and web content published after 2012 will conform to WCAG2.0 Level AA to the extent practicable other than criteria 1.2.4 (captions) and 1.2.5 (pre-recorded audio descriptions).
- Note that WCAG2.0 requirements only apply to websites, web content and web based applications that an organization can control either directly or through a contractual relationship and where meeting the requirements are technically feasible, including considering the availability of commercial software or tools or both.

### 6.0 Accessible Employment Standards

- The Accessible Employment Standards apply to all paid employees. Roots of Empathy will inform employees of the policies and changes in policies used to support employees with disabilities throughout the employment life cycle.

#### 6.1 Recruitment, Assessment, Selection

- Roots of Empathy will specify that accommodation is available for applicants with disabilities in its recruitment processes on the website and on job postings.
- Roots of Empathy will inform internal and external job applicants when they are individually selected to participate in an assessment or selection process that accommodations are available upon request in relation to the materials or processes to be used.
- If a selected applicant requests an accommodation, Roots of Empathy will consult with the applicant and provide or arrange for the provision of a suitable accommodation, having regard for the applicant's accessibility needs.
- When making an offer of employment, Roots of Empathy will notify the successful applicant of the policies for accommodating workers with disabilities at the time of the offer and as soon as practicable after the new employee begins work (specifically, during orientation).

### **6.2 Informing Employees of Supports**

- Roots of Empathy informs employees of policies used to support employees with disabilities including policies on the provision of job accommodation that take into an account the employee's accessibility needs.
- The information will be provided to new employees as soon as practicable after they begin their employment.
- Updated information will be provided to employees whenever there is a change to existing policies on the provision of job accommodations.

### **6.3 Accessible Formats and Communication Supports for Employees**

- When requested by an employee, Roots of Empathy will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed in order to perform the employee's job and also for information generally available to employees in the workplace. Roots of Empathy will consult with the employee making the request in determining the suitability of an accessible format or communication support.

### **6.4 Individualized Workplace Emergency Response Information**

- In the event of a planned or unexpected disruption to services or facilities for visitors with disabilities, we will notify individuals promptly.
- This clearly posted 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.
- The notice will be placed at Reception and any other means that will reasonably ensure that the notice reaches those persons potentially affected by the temporary disruption in a manner that is accessible to them.

### **6.5 Documented individual accommodation plans**

- A written process for the development and maintenance of documented individual accommodation plans shall be developed for employees with disabilities. If requested, these plans shall include information regarding accessible formats and communication supports. If requested, the plans shall include individualized workplace emergency response information.

### **6.6 Return to work**

- Roots of Empathy has a written return to work process for employees who have been absent from work due to a disability and require disability-related accommodation to return to work. The return to work process:
  1. outlines the steps Roots of Empathy will take to facilitate the return to work of employees who were absent because their disability required them to be away from work; and
  2. uses documented IAPs as described above.

### 6.7 Performance Management, Career Development, Advancement & Redeployment

- Roots of Empathy shall take into account the accessibility needs of employees with disabilities and IAPs in its performance management processes, when providing career development and advancement opportunities and when considering redeployment of employees with disabilities.

### 7.0 Design of Public Spaces Standards

The Accessibility Standards for the Built Environment focus on removing barriers in two areas:

1. public spaces, and
2. buildings.

Enhancements to accessibility in buildings will happen at a later date through Ontario's Building Code, which governs new construction and renovations in buildings.

Roots of Empathy will work in compliance with the Property Manager toward meeting the Accessibility Standards for the Design of Public Spaces when the Property Manager builds or makes major modifications to public spaces, which may include outdoor public use eating areas, accessible off-street parking, ramps, sidewalks, entrances and service-related elements like service counters, waiting areas and washrooms.

## APPENDIX

Related Documents:

- Accessibility Guidelines – Customer Service
- Multi-Year Plan
- Customer Feedback Form