Accessibility Policy – 1.VS.4

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1. Introduction / Objective

In 2005, the Ontario government passed Accessibility for Ontarians with Disabilities Act, (AODA) with the goal to make Ontario accessible to people with disabilities in key areas of daily living by 2025. People with disabilities are a vibrant, important and growing part of the Ontario population.

Our commitment to ensure accessible customer service was reflected in our Accessibility and Customer Service Policy 1.VS.5 in January 2011. The Integrated Accessibility Standards Regulation which became law in 2011 includes standards for information and communications, employment and transportation.

The purpose of the Accessibility Policy is to outline the YMCA’s commitment to working towards being compliant with all the standards under the AODA, to move the Association towards the goal of improved accessibility for people with disabilities by 2025.

The YMCA endeavors to provide accessibility and accommodation as prescribed in the AODA but also because it is consistent with our culture and values. By removing barriers to participation that exist within our Association the YMCA strives to become more socially inclusive and to ensure that people with disabilities are valued for their contributions at the YMCA.

The YMCA values a diverse and socially inclusive environment, which is reflected in our Program and Services Guiding Principle (1.G.6) as follows: The YMCA recognizes and values diversity and social inclusion as underpinnings of what we stand for and what we do. We regard the diversity of people and communities as assets, and recognize their contribution to the social, political and cultural enrichment of the Greater Toronto area and in this Association. As a socially inclusive YMCA, we ensure that diverse individuals and communities share in power, give voice effectively to their issues, are involved in decision-making processes, and have fair access to information and services.

In fact, our strategic plan, Strong Start, Great Future 2010-2020 highlights this commitment by indicating improved access through a “renewed emphasis on diversity and social inclusion, in many cases with special emphasis on eliminating barriers for people with disabilities…The YMCA will not only comply with new provincial legislation on accessibility but will energetically pursue its building blocks of access, choice, social inclusion and prevention”. (Strong Start, Great Future, p. 6)

Our approach to diversity and social inclusion established many years ago identifies “abilities” as one of our eleven dimensions of diversity.
2. Policy Statement

The YMCA recognizes the dignity and worth of every individual and seeks to create socially inclusive environments in which everyone, including persons with disabilities, is able to participate fully. Building on a culture that embraces diversity and supports social inclusion, the YMCA is a shared experience in which everyone can enjoy.

The YMCA is committed to:

- The principles of dignity and independence of persons with disabilities, integration and equality of opportunity
- Reinforcing our YMCA values of: caring; health; honesty; inclusiveness; respect and responsibility in our relationships between individuals with disabilities and our Association
- Establishing, maintaining and implementing policies, and procedures in the Integrated Accessibility Standards Regulation of the AODA, specifically in the area of information and communications; employment, and later, the built environment (when the standard is completed)
- Meeting the accessibility needs of people with disabilities, in a timely manner, through the implementation of this policy
- Excellence in serving members including people with disabilities. When providing information to, or communicating with a person with a disability, we will provide the information and communication in a manner that takes into account the person’s disability
- Ongoing improvements to accessibility in our premises and facilities as required by law, as well as the services offered to customers, employees, and members of the general public
- The establishment, implementation, maintenance and documentation of a multi-year Accessibility Plan which outlines the Association’s strategy to prevent and remove barriers and to update the plan as it progresses. Our plan has been posted on our web site effective January 1, 2014
- Ongoing training of all employees, volunteers, persons who deal with customers or the public on the YMCA’s behalf (according to the Accessibility and Customer Service Policy 1.VS6)
- Ongoing training on the requirements of the Integrated Regulations and also the Human Rights Code as it pertains to persons with disabilities to meet established regulation deadlines

3. Scope

This policy applies to YMCA’s employees, customers (members, visitors, contractors and subcontractors) engaged by the YMCA, volunteers, and applicants for employment with the YMCA through the recruitment, assessment, selection and hiring process.

The policy applies to all locations in which the YMCA of Greater Toronto operates in Ontario.

4. Definitions

Accessible formats may include but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.
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 individual’s unique needs.

Barrier is anything that prevents a person with a disability from fully participating in all aspects of society because his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technology barrier or a policy or practice.

Communication Supports may include but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

Disability means:
   a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness, illness and without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical coordination, 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.

Communications means the interaction between two or more persons or entities or any combination of them, where information is provided, sent or received.

Dignity means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

Equal opportunity means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given by others.

Independence means when a person is able to do things on their own without unnecessary help or interference from others.

Information includes data; facts and knowledge that exist in any format, including test, audio, digital or images and that convey meaning.

Integration means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals unless an alternative measure is necessary to enable the individual to access goods or services.

Reasonable efforts mean taking approaches that meet the required needs of individuals.
5. Legislative Context

**Accessibility for Ontarians with Disabilities Act (AODA)**

The AODA details specific requirements and standards for accessibility in Ontario. Standards include Accessibility Standards for Customer Service along with integrated regulations with specific standards for information and communications, employment and transportation and when passed, the built environment.

**Ontario Human Rights Code**

Every person has a right to equal treatment with respect to services, goods and facilities, including housing, and employment. This right is guaranteed by the Ontario Human Rights Code (Code) and, when necessary, enforced by the Human Rights Tribunal of Ontario.

6. Roles and Responsibilities

All Senior managers and Managers shall:

- Monitor and support staff in the implementation of the Accessible Customer Service Policy (1.VS.6) in their Program area
- Contact the SVP HR and Organizational Development or Manager Accessibility for more information on training or resources available
- Respond to feedback including any accessibility related concerns
- Ensure that staff participate in relevant training

The Senior Vice President Human Resources and Organizational Development (or designate) shall:

- Oversee the implementation of the Association’s Accessibility Plan 2014-2019 through delegated leads throughout the Association for Information and Communications; Employment and the Build Environment (when the standard is passed)
- Oversee the administration of this policy with the assistance of the Manager Accessibility and to ensure that the organization achieves compliance with the law and creates accessible environments
- Identify training needs regarding Human Rights and Accessibility Association-wide

7. Procedures

7.1 The YMCA will work to improve accessibility by developing and updating a multi-year accessibility plan which conforms to the Regulations, outlines a phased-in strategy to prevent and remove barriers. It will also address the identification, removal and prevention of barriers to people with disabilities within the Association; evaluate progress to achieve objectives as per AODA target dates. The plan will meet the needs of all customers and employees with disabilities, and provide a mechanism for reviewing and evaluating the implementation of the AODA Accessibility Standards.
7.2 The YMCA has posted our Accessibility Plan on the YMCA Web site and provided all information related to the plan in alternative formats upon request commencing January 1, 2014.

7.3 The YMCA of Greater Toronto will assess current policies, practices and procedures, premises, access to goods and services, and information and communication systems to identify barriers for people with disabilities.

Requirements under the Information and Communication Standards

7.4 By January 2017, the YMCA will provide or arrange for the provision of assessable formats or communication supports for a person with a disability upon request with the person consulted as to their needs. The alternative format will be provided in a timely manner and cost of providing an accessible format must not be more than the regular cost charged to other people. We will notify the public about the availability of accessible formats and communication supports. If the information is unable to be converted, the Association will provide an explanation on why it is not convertible.

7.5 The plan will include the requirements under the information and communications standard, which outlines the Association’s strategy to provide accessible information and communications. This includes barriers to information and communications systems/platforms; determining the accessibility of the YMCA’s information components and systems; establishing a practice that YMCA documents are created in a structured electronic format to allow for easier conversion to accessible formats; establishing a standard for documents that will be as accessible as possible without the need for accessible formats (i.e. font style/colour, colour contrast, plain language).

7.6 General Managers responsible for various facilities in cooperation with Asset Development Department staff will assess the emergency response plan and procedures and any other public safety information for barriers to persons with disabilities during an emergency. General Managers are responsible for updating their emergency procedures to ensure that procedures can be followed by persons with disabilities and to ensure that they meet the needs of persons with disabilities. Upon request provide the information in an accessible format or with communication supports as soon as that is practicable. Consult with the person with a disability in the case of a request for alternative accessible format and communication supports.

7.7 Effective January 2015, the YMCA has ensured that its feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request. When an accessible format is requested, the person making the request is consulted to determine suitability of the format. The public is notified about the availability of accessible formats and communication supports. Review the procedure annually or when there are changes to the law or when an incident or breach occurs.
7.8 The YMCA will ensure that its new web site and web content complies with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and increasing to level AA (for all web sites and content) by 2021.

Requirements under the Employment Standard

7.9 The employment standard applies to paid employment and aims to make employment practices and workplaces more accessible to potential and existing employees with disabilities. The standard builds on existing requirements of the Human Rights Code.

7.10 By 2016, the YMCA will: ensure that job postings indicate that candidates who request accommodation to attend interviews will be accommodated during the interview process; inform new employees of supports available to them in offer letters; provide accessible formats and communication supports if needed; develop and document individualized accommodation plans for individuals with disabilities; facilitate return to work; take into consideration an employee’s accessibility needs within human resources practices such as performance assessment, career development, advancement and redeployment. (Refer to Human Rights in the Workplace Policy 2 S 3.)


8. YMCA Related Policies/Procedures and Reference Documents

- YMCA Safety and Emergencies Procedures - available on the YMCA intranet, contains steps to follow for assisted evacuation for persons with a disability, and includes the requirement for individualized workplace response plans for employees with a disability
- Human Rights Policy 1.VS.1 - Our obligation under the Ontario Human Right Code for members, volunteers, staff and others
- Human Rights in the Workplace Policy 2.S.3 – our obligation to YMCA employees under the Ontario Human Rights Code
- Accessibility and Customer Service Policy 1.VS.5 – Our obligation under Accessibility for Ontarians with Disabilities Act (AODA) and Ontario Regulation 429/07 Accessibility Standards for Customer Service

9. Contacts and Other Resources

The YMCA’s policies, practices and procedures related to the AODA are available to the public upon request. Where a request is made for a document by a person with a disability, the YMCA shall provide the document or the information contained in the document in a format that takes into account the person’s disability.

Staff may send any questions or requests for more information to the following email address: accessibility@ymcagta.org. Every question or information request will receive a response.
For more information about this policy, staff may speak with their general manager or vice president, or contact the Senior VP of Human Resources and Organizational Development or Manager of Accessibility.

In addition, the following are sources for information about Accessibility Standards in Ontario:

- To view the Accessibility for Ontarians with Disabilities Act, or Ontario Regulation 429/07 Accessibility Standards for Customer Service, visit www.e-laws.gov.on.ca

- To review requirements under the Accessibility for Ontarians with Disabilities Act or for additional resources about accessibility, visit www.mcss.gov.on.ca/mcss