



GIAG Integrated Accessibility Standards Policy

Statement of Intent

As an organization, GIAG (Glengarry Inter-Agency Group Inc.) which shares the AODA principles of dignity, independence, and equal opportunity to access services, is committed to excellence in serving all clients including people with disabilities.

We believe in integration and equal opportunity that ensures persons with disabilities (“PWD”) have the same opportunities to access and benefit from our services. GIAG is committed to meeting the needs of people with disabilities in a timely manner and do so by removing barriers to accessibility and meeting accessibility requirements under the Integrated Accessibility Standards Ontario Regulation 191/11 (IASR) of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA).

Scope

This policy is intended to meet the requirements of Accessibility Standards for Customer Service, Ontario Regulation 429/07 under the Accessibility for Ontarians with Disabilities Act (AODA), 2005, and applies to the provision of services to the public or other third parties, not to the services themselves.

- a) This policy applies to the provision of services at all premises operated by GIAG.
- b) This policy applies to employees, volunteers, and third-party contractors who deal with the public or other third parties that act on behalf of GIAG, including when the provision of services occurs off the premises of GIAG such as in: outreach activities and the delivery of services at community events, job fairs, conferences etc.
- c) The section of this policy that addresses the use of service animals only applies to the provision of services that take place at sites operated by GIAG.
- d) This policy shall also apply to all persons who participate in the development of the GIAG policies, practices and procedures governing the provision of services to members of the public or third parties.

Definitions

Disability – For the purpose of this Policy, the term disability as defined by the Accessibility for Ontarians with Disabilities Act, 2005, and the Ontario Human Rights Code, is defined as:



- 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 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, including a workplace injury or disability

Accessible Format, Communication Support and Assistive Devices:

– For the purposes of this Policy, accessible format, communication support and assistive devices may include:

Large print, recorded audio and electronic formats, brail and other formats useable by persons with disabilities; captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications; wheelchairs, walkers, and electronic communication devices and other devices.

Barrier For the purposes of this Policy, a barrier is defined as:

Anything that keeps someone with a disability from participating fully in society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technology barrier, a policy or a practice.

The Provision of Services to Persons with Disabilities

- The services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities.
- The provision of services and/or facilities to persons with disabilities will be integrated with the provision of services and/or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the services and/or facilities.
- Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the services and/or facilities.
- When communicating with a person with a disability, the provider will do so in a manner that considers the person's disability.
- The agency will accommodate any use of assistive devices by persons with disabilities to obtain, use or benefit from the services and/or facilities, or other measures, if any, which enable them to do so. We will ensure that our staff is trained and familiar with the equipment or devices we have on site or that we provide that may help in providing goods or services to people with disabilities.



- We welcome people with disabilities who are accompanied by a service animal. Service animals are allowed on our premises unless excluded by law. If excluded by law, we will do the following to ensure people with disabilities can obtain, use and benefit from our goods and services:

General Standards

Accessibility Plan:

GIAG's multi-year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and to address the current and future requirements of the AODA. Progress on the Plan is reported on annually, is posted on the organization's website and is provided in accessible formats upon request.

Assistive Devices

Customer's own assistive device(s):

Persons with disabilities may use their own assistive devices as required when accessing services provided by GIAG.

In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures when possible will be used to ensure the access of services.

Assistive devices provided by GIAG:

Assistive devices provided by GIAG are available on a first come, first serve basis and upon request, to assist customers in accessing our services.

Service Animals

A customer with a disability that is accompanied by a service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to service animals.

Food Services Areas / Kitchens Exclusion Guidelines:

A customer with a disability that is accompanied by a service dog will be allowed access to food service areas and/or kitchens that are open to the public unless otherwise excluded by law. Service animals, other than service dogs are not allowed in food service areas and/or kitchens.

If a service animal is excluded by law, GIAG will offer alternative methods to enable the person with a disability to access services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).



Recognizing a Service Animal:

If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, GIAG may request verification from the client.

Verification may include:

- a letter from a physician or nurse confirming that the person requires the animal for reasons related to the disability,
- a valid identification card signed by the Attorney General of Canada; or,
- a certificate of training from a recognized guide dog or service animal training school.

Care and Control of the Animal:

The client that is accompanied by a service animal is responsible for maintaining care and control of the animal at all times.

Allergies:

If a health and safety concern present's itself for example in the form of a severe allergy to the animal, GIAG will make all reasonable efforts to meet the needs of all individuals.

Support Persons

If a client with a disability is accompanied by a support person, GIAG will ensure that both persons are able to enter the premises together, and that the customer is not prevented from having access to the support person.

In situations where confidential information might be discussed, consent will be obtained from the client, prior to any conversation where confidential information might be discussed.

Admission Fees:

If payment is required by a support person for admission to a special event at the premises, GIAG will ensure that notice is given in advance by posting notice of admission fees for support persons in advertisement of the event.

Notice of temporary disruption

In the event of a planned or unexpected disruption to services or facilities, GIAG will notify clients 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.

Information and Communications

GIAG is committed to making information and communications accessible to persons with disability through print, telephone, websites and other means.



Accessible Information:

GIAG ensures its information and communications are accessible and provided in accessible formats that meet the needs of persons with disability. This is provided, upon request, in a timely manner, taking into consideration the person's accessibility needs due to disability, and at a cost that is no more than the regular cost charged to other persons. GIAG consults with the person making the request in determining the suitability of an accessible format or communication support.

Accessible Websites and Web Content

GIAG shall make the public website and web content, conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0), Hoping to be at Level A by January 1, 2021.

Accessible Emergency Information

GIAG provides emergency procedures and plan information to the public in an accessible format, or with appropriate communication supports, as soon as practicable, upon request.

Feedback Process

GIAG shall provide customers with the opportunity to give feedback on the service provided to clients with disabilities.

Clients who wish to provide feedback on the way GIAG provides services to people with disabilities can do so in any of the following ways:

- Feedback forms are available in the Human Resource office and Receptionist Desks at each of our locations.
- Feedback can also be provided in person to the client's primary contact at GIAG, the site or program manager or to the person with whom they are interacting.
- Alternate methods of providing feedback such as verbally (in person) or written (handwritten), delivered, website or email) are available upon request.

All feedback and/or complaints will be directed to the appropriate department and management personnel for review.

Complaints will be addressed according to our organization's regular complaint resolution process as detailed in the GIAG Policy and Procedures manual -HR 4.02.

Clients who make a formal complaint or raise a concern will receive acknowledgement of their feedback and notice of any resulting actions based on concerns or complaints that were submitted.



Employment

GIAG is committed to fair and accessible employment practices.

Recruitment and Selection

GIAG provides notice to its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment and selection processes.

During the recruitment process, applicants are notified that accommodations are available upon request relating to materials or processes being used. Arranging suitable accommodation is determined by GIAG in consultation with the candidate and takes into consideration the candidate's accessibility needs due to disability.

When making an offer of employment, the successful candidate is notified of GIAG's policies for accommodating employees with disabilities.

Supports for Employees

GIAG's employees are informed of policies used to support employees with disabilities, including policies on the provision of job accommodations that take into consideration an employee's accessibility needs due to disability.

This communication is part of every new employee's orientation package.

Performance Management, Career Development, Advancement and Redeployment

The performance management process, including assessment, goal setting, talent management (also includes office relocation), takes into consideration the accessibility needs of employees with disabilities, as well as individual accommodation plans.

Accommodation Plans

GIAG maintains documented individual accommodation plans for employees with disabilities. As necessary and as requested, the individual employee plan could include information regarding accessible formats and communication supports.

Return to Work Accommodation's Plan following a Disability Leave

GIAG's return to work process is for employees returning from disability leave who require disability related accommodation to facilitate their return to work. This may also include workplace emergency response information.



Workplace Employee Emergency Response Information

GIAG provides employees individualized workplace emergency response information as requested or when made aware of the need for accommodation due to disability. GIAG provides this information as soon as practicable after becoming aware of the need for accommodation. Written emergency accommodation plans are documented for the individual and reviewed/assessed when:

- The employee moves to a new office,
- The employee's overall accommodation plan is being reviewed; and,
- GIAG reviews overall emergency response policies.

Design of Public Spaces Standards

The goal of the Accessibility Standards for the design of Public Spaces is to remove barriers in the public spaces and buildings. GIAG shall have regard to accessibility for persons with disabilities when designing new or making major modifications to waiting areas and service counters in GIAG public spaces.

Training

Training will be provided to:

- a) all employees, volunteers, and others who deal with the public or third parties on our behalf.
- b) people involved in the development and approval of our customer service policies.

Training will include:

- Purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of 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.
- Glengarry Inter-Agency Group Inc. policies related to the customer service standard.
- How to use the equipment or devices available on-site or otherwise available that may help in providing goods or services to people with disabilities.
- What to do if a person with a disability is having difficulty accessing our services.
- Staff will also be trained when changes are made to our accessible customer service policy and changes to legislation.

Record of Training:

GIAG shall keep a record of the training, including the dates on which the training is provided and the number of individuals to whom it is provided.



Transportation:

GIAG employees are available to aid in transporting a PWD. Company vehicles have been outfitted with handrails for extra support and has a wheelie platform for additional help to clients who need it. Necessary accommodation is provided by a third party when needed.

Vehicle accident/incident procedures Policy Statement:

GIAG shall ensure that procedures are in place to guide drivers in the event of a collision/accident involving a GIAG vehicle.

Purpose:

All accident/incidents, regardless of severity, must be managed in a professional manner.

Documentation assists GIAG to address the situation and accurately relay information to parents, insurance, and police.

Procedure:

An accident is defined as one of our vehicles coming into contact with another vehicle, a person or an object.

An accident is also defined as an incident requiring first aid treatment.

An incident is defined as an event in which the vehicle must be pulled over that does not require first aid attention but does require full attention or assistance.

Incident:

1. Pull vehicle over safely to the side of the road
2. Address the situation calmly
3. Phone GIAG for assistance if required
4. Complete Incident/Accident form

Daily Vehicle Inspection Policy Statement:

GIAG shall inspect daily, any vehicles to be driven and document such inspection in the Vehicle and Usage Log located in each vehicle.

**Purpose:**

GIAG is committed to providing transportation services compliant with the Ministry of Transportation guidelines. This requires that the daily vehicle inspection be conducted and documented.

Procedure:

Ministry of Transportation Guidelines:

Requires that a complete and thorough vehicle inspection be completed before the vehicle being driven on any day.

Requires that the vehicle inspection be documented and signed in the Vehicle Inspection Log.

Requires that any defects and/or damage be logged and reported immediately

Fines levied for non-compliance can be levied by the Ministry.

GIAG Guidelines:

Requires that all Ministry guidelines be followed.

Requires that every driver complete a walk around inspection of any vehicle they are to be driving before and directly after driving the vehicle and that such inspection is noted in the Vehicle Inspection Log

Requires that any defects and/or damage not previously noted be reported to the Program Manager immediately.

Drivers' Records Policy Statement:

GIAG shall keep up to date records of all drivers Driving GIAG Vehicles.

Purpose:

GIAG wishes to adhere to best practices with respect to screening and monitoring of the status of Driving Records, for the safety and well-being of all persons using the GIAG's transportation services.

Procedure:

1. Each driver shall provide a copy of his or her current and valid driver's license.
2. Any changes to the status of a driver's license must be reported immediately to the Program Manager/Designate.

Managing Behaviours while driving Policy Statement:

Drivers must maintain discipline in GIAG vehicles at all times.



Purpose:

GIAG shall make every effort to provide safe and reliable Transportation Services.

Procedure:

Minor inappropriate behavior issues are defined as but not limited to any situations, which can be dealt with while remaining on the road.

Major inappropriate behaviors are defined as but not limited to any situations where they must be taken off the road (pulled over to the side).

1. Should minor behavior issues arise; the Support Staff and/or Driver will handle the situation verbally. If this cannot happen, the behavior is then deemed major.
 2. Should major behavior issues arise the Driver will pull the vehicle off the road in a safe manner.
 3. If there is a support staff on the vehicle:
 - a) The driver will call GIAG to inform the senior staff of the delay.
 - b) Follow steps of dealing with an incident
 - c) The support staff will complete an incident report
 4. If no support staff are available, the Driver:
 - a) Will pull the vehicle over and address the behavior through discussion of the problem at hand explaining the safety implications.
 - b) Call GIAG when possible to inform the Senior Staff of the situation.
- Complete and incident report to hand in to the immediate supervisor

Transportation of Members Policy Statement:

GIAG shall provide safe transportation to and from programming/special events and out-trips by GIAG paid employees in GIAG vehicles exclusively.

Purpose:

GIAG wishes to adhere to best practices with respect to safe transportation of members/guests

Procedure:

All safety parameters will be employed for the return of the member. Including the ministry guidelines for booster seats. Booster seats provide 60 per cent more protection than seatbelts alone. These must be used by pre-school and primary-grade-aged children who have outgrown their forward-facing child car seat, are under the age of eight and weigh 18 kilograms (40 lbs.) or more but less than 36 kilograms (80 lbs.), and who are less than 145 centimetres (4 feet, 9 inches) tall. Booster seats raise a child so that the adult seatbelt works more effectively. The child's head must be supported by the top of the booster, vehicle seat or headrest. You must use a booster seat with a



lap/shoulder belt. The lap/shoulder belt should be worn so that the shoulder belt fits closely against the body, over the shoulder and across the centre of the chest and the lap belt sits firmly against the body and across the hips. Always follow the manufacturer's instructions when installing a booster seat in your vehicle and secure the booster seat with a seatbelt when a child is not travelling in it or remove it from the vehicle.

If your vehicle has lap belts only, secure the child by the lap belt only. Never use a lap belt alone with a booster seat.

Children may begin wearing a seatbelt once they are able to wear it properly (a lap belt flat across the hips, shoulder belt across the centre of the chest and over the shoulder), and if any one of the following criteria is met:

The child turns eight years old.

The child weighs 36 kilograms (80 lbs.) or more.

The child is 145 centimetres (4 feet 9 inches) tall or taller.

Do not place a child in a seating position in front of an air bag that is not turned off. The safest place for a child under age 13 is in the back seat.

Availability and Format of Documents

Documents related to the Accessibility Standard for Customer Service may be made available upon request and in a format that takes into consideration the customer's disability. Notification will be given by posting the information in a conspicuous place on the premises operated by GIAG, as well as on the agency's website.

Posting and Availability of Policy

This policy is posted on the GIAG website, under the URL: www.giag.ca . A hard copy is available for review by the public at each of our Resource Information Centres.

Policy Modification

Any policy of the Glengarry Inter-Agency Group Inc that does not respect and promote the principles of dignity, independence, integration and equal opportunity for people with disabilities will be modified or removed.



Multi-Year Integrated Accessibility Plan:

GIAG’s multi-year Accessibility Plan outlines a phased-in strategy to prevent and remove barriers and to address the current and future requirements of the AODA. Progress on the Plan is reported on annually and is provided in accessible formats upon request.

AODA Integrated Accessibility Plan (IASR)

Regulation/ Topic	Target Date	Requirement	Status
Integrated Accessibility General	January 1, 2014	<ul style="list-style-type: none"> ➤ Develop GIAG Accessibility Policy for IASR including statement of commitment ➤ Develop GIAG Multi-Year Accessibility Plan <ul style="list-style-type: none"> - Policy and Plan to be posted on the organization website www.giag.ca and to be available in accessible format - Plan for a functional team to represent IT, Marketing and Communication, Quality Assurance, Administration, HR and Operations and Service Delivery to contribute to the accessibility processes and implementation of each phase of the Plan - Committee oversight provided by HR and Operations 	Complete
	January 1, 2015	<ul style="list-style-type: none"> ➤ Develop and deliver training to employees on IASR requirements that apply to GIAG and the Ontario Human Rights Code (related to disabilities) <ul style="list-style-type: none"> - HR to develop and deliver training and record its completion - Deliver to all employees, volunteers and third-party contractors, Board members and anyone involved in developing organization policies - Training for new employee orientation and onboarding processes - Training to be provided on any changes to the prescribed policies 	Complete
	January 2019 - 2024...	<ul style="list-style-type: none"> ➤ Review accessibility plan every 5 years <ul style="list-style-type: none"> - Continue to identify new opportunities to eliminate barriers and provide updates to multi-year plan as needed and post progress made 	
Build Environment			



Design of Public Spaces Standards		<ul style="list-style-type: none"> ➤ Meet Accessibility Standards for Design of Public Spaces when building or making major modifications to GIAG public spaces - Examine related public spaces including service counters and waiting areas 	
Information and Communication	January 1, 2016	<ul style="list-style-type: none"> ➤ Provide accessible formats and communication supports - Define, develop and arrange for the provision of accessible formats and communication supports most suitable for persons with disabilities accessing GIAG services - Establish process for employees to consult with PWD and make decision in determining the suitability of the accessible format or communication support and provide this in a timely manner at a cost no more than the cost charged to other persons 	
	January 1, 2014	<ul style="list-style-type: none"> ➤ New websites and significant refresh meet WCAG 2.0 Level A - Meet WCAG 2.0 Level A for all new websites and significant refresh to confirm to WCAG 2.0 Level A - Provide text and audio alternatives available to PWD upon request 	
	January 1, 2021	<ul style="list-style-type: none"> ➤ All websites and content meet WCAG 2.0 Level AA - New website content coded to meet WCAG 2.0 Level A/AA - AODA compliance is included as one of the criteria for selecting technology vendors/software for new website development initiatives 	
	January 1, 2012	<ul style="list-style-type: none"> ➤ Emergency procedures and plans accessible to public - Provide emergency procedures/plans in accessible format upon request - Provide employees with disabilities with individual emergency evacuation plans as requested or disability known to the organization 	
		<ul style="list-style-type: none"> ➤ Provide feedback processes in accessible format with communication supports as requested - Make feedback forms in accessible format available in Resource Information Centre and Reception Desks at each location; available in larger print upon request or with communication supports 	



		<ul style="list-style-type: none"> - Link to on-line feedback available on website - Feedback can be provided in person with primary contact or to Manager - Alternative methods can be made available upon request 	
Employment		<ul style="list-style-type: none"> ➤ Recruitment and hiring processes provide accommodation - Review and as necessary make modifications of existing recruitment and hiring policies, procedures and processes - Specify on GIAG website, job posting etc. that accommodation is available - Include availability of accommodation as part of the script for all recruitment and selection processes - Upon request, consult with the applicant to arrange for provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability 	
		<ul style="list-style-type: none"> ➤ Accommodation plans for Performance Management and Career development - Review and as necessary make modifications or develop new processes that address accessibility needs for persons with disabilities in providing these programs 	
		<ul style="list-style-type: none"> ➤ Employee Emergency Response Plans - Workplace Emergency Response forms and Individual Emergency Response plans developed for employees who have disclosed a disability and may also have accommodation as required 	