



## The Accessibility for Ontarians with Disabilities Act (AODA) Policy

March 2026

### Rationale

ACCES is committed to providing a barrier-free workplace where employees can participate fully in all aspects of their job.

### Purpose

This policy outlines ACCES's compliance with *The Accessibility for Ontarians with Disabilities Act, 2005* and approach to workplace accommodation, accessibility, customer service standards and communication.

### Policy

ACCES will seek to provide accommodation and accessibility both individually and systemically to provide a workplace that is accessible to all employees, stakeholders and people.

ACCES is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination and complies with *The Accessibility for Ontarians with Disabilities Act, 2005* (AODA) in ensuring that its programs and services are fully accessible to people with disabilities. Most importantly, the core principles of the Act - independence, dignity, integration, equality of opportunity for people with disabilities - are aligned with inclusion, one of our organizational values, that help us achieve our mission. We support initiatives that prevent and remove barriers and promote or increase equitable access to social and economic participation in community life.

### Scope

This policy applies to all ACCES employees, volunteers, third party contractors who work on behalf of ACCES, stakeholders and to members of the general public in their interactions with the organization, whether in person or in services offered remotely.

Our AODA program entails our communications, client service, employment and design of public spaces.

### Policy Guidelines

In accordance with the Customer Service Standards, this policy addresses the following:

1. The Provision of Goods and Services to Persons with Disabilities
2. The Use of Assistive Devices
3. The Use of Guide Dogs, Service Animals and Service Dogs
4. The Use of Support Persons
5. Notice of Service Disruptions



6. Client Feedback
7. Training
8. Notice of Availability and Format of Required Documents

### The Provision of Goods and Services to Persons with Disabilities

ACCES will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all clients receive the same value and quality.
- Allowing clients with disabilities to do things in their own ways, at their own pace when accessing goods and services if this does not present a safety risk.
- Using alternative methods, when possible, to ensure that clients with disabilities have access to the same services, in the same place and in a comparable manner.
- Considering individual needs when providing goods and services.
- Communicating in a manner that considers the client's disability.

### The Use of Assistive Devices

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

### The Use of Guide Dogs, Service Animals and Service Dogs

A client with a disability that is accompanied by guide dog, service animal or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

The client is responsible for the care and control of the animal at all times.

### The Use of Support Persons

If a client with a disability is accompanied by a support person, ACCES will ensure that both persons are allowed to enter the premises together and that the client 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.

### Notice of Service Disruptions

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of ACCES. In the event of any temporary disruptions to facilities or services that clients with disabilities rely on to access or use ACCES services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

Notifications will include:



If a notification needs to be posted the following information will be included unless it is not readily available or known:

- Services that are disrupted or unavailable.
- Reason for the disruption.
- Anticipated duration; and
- A description of alternative services or options.

When disruptions occur ACCES will provide notice by:

- Posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the ACCES website.
- Contacting clients with appointments.

### Feedback Process

ACCES has established processes for receiving and responding to feedback on services. For persons with disabilities, the feedback processes are provided in accessible formats and with communication support upon request. Clients who wish to provide feedback on the way ACCES provides services (and/or goods) to people with disabilities can do so in any of the following ways:

- By email to our general mailbox, [info@acesemployment.ca](mailto:info@acesemployment.ca)
- In person, by telephone or in writing to the client's primary contact at ACCES, the site or program manager or to the person with whom they are interacting.

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

Complaints will be addressed according to our organization's regular complaint resolution process as detailed in the ACCES External Complaint Policy.

### Accessible Client Service Training

Training will be provided to:

- Every person who is an employee.
- Every person who participates in developing policies.
- Every other person who provides goods, services, or facilities on behalf of the provider.

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*.
- A review of the requirements of the Customer Service Standards.
- Instructions on how to interact and communicate with people with various types of disabilities.
- Instructions on how to interact with people with disabilities who:
  - use assistive devices.
  - require the assistance of a guide dog, service dog or other service animal; or
  - require the use of a support person (including the handling of admission fees).



- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities.
- Instructions on what to do if a person with a disability is having difficulty accessing your services.
- ACCES policies, procedures and practices pertaining to providing accessible client service to clients with disabilities.

ACCES provides training as soon as practicable. ACCES keeps a record of training that includes the dates training was provided and the number of employees who attended the training.

### Notice of Availability and Format of Required Documents

We communicate with people with disabilities in ways that take into account their disability. When asked, we will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- in a timely manner, taking into account the person's accessibility needs due to disability; and
- at a cost that is no more than the regular cost charged to other persons.

We will consult with the person making the request in determining the suitability of an accessible format or communication support.

ACCES shall notify clients that the documents related to the Customer Service Standards are available upon request and in a format that considers the client's disability. Notification will be given by posting the information on the ACCES website.

Some people use methods other than standard print to access information. Some communicate in ways other than the spoken word.

Upon request provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, including:

- accessible electronic formats such as HTML and MS Word
- accessible audio formats
- large print
- text transcripts of visual and audio information
- reading the written information aloud to the person directly
- exchanging hand-written notes (or providing a note taker or communication assistant)
- captioning or audio description
- assistive listening systems
- augmentative and alternative communication methods and strategies such as the use of letter, word or picture boards, and devices that speak out messages
- repeating, clarifying, or restating information



### Policy Administration

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.



## Integrated Accessibility Standards Regulation (IASR) Policy

### **Policy**

ACCES is committed to providing high quality standards of service that can be accessed in a manner that respects the dignity and independence of persons with disabilities. ACCES ensures that persons with disabilities have the same opportunities to access and benefit from the ACCES services in ways like others.

ACCES policies and practices are based on the four underlying principles of dignity, independence, integration, and equal opportunity.

The implementation of this policy is a multi-year process. The timeline for the implementation of the commitments within this policy is outlined in Appendix A.

### **Scope**

This policy applies to all employees as well as volunteers, contractors, any other individuals who interact with the public or third parties in Ontario, who represent or act on behalf of ACCES in any manner.

### **Statement of Commitment**

ACCES 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 that ensures persons with disabilities (“PWD”) have the same opportunities to access and benefit from our services. ACCES 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).

### **Training on AODA Accessibility Standards & Ontario Human Rights Code**

Training is provided to employees and third-party contractors on the Ontario’s AODA Accessibility Standards and the Ontario Human Rights Code as it relates to people with disabilities (except for service providers whose contracts require that they have completed training prior to commencement of service). The Human Resources department maintains records on the completion of training.

### **Design of Public Spaces**

ACCES takes persons with disabilities into consideration when designing new or making modifications to ACCES public spaces.



## Information and Communications

ACCES is committed to making information and communications accessible to persons with a disability.

### Accessible Websites and Web Content

ACCES's public website and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG 2.0), Level AA as of January 1, 2021.

In addition to conforming to WCAG requirements, the website includes functional accessibility features to allow website users with vision impairment, to adjust the website content, to adapt to their vision needs. This includes changing font size, contrast and colour.

The website compliance checker, "Siteimprove" is utilized to continuously check our website to identify conformance issues. This supports our website managers to fix any deficiencies to maintain compliance standards.

### Accessible Emergency Information

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

### Feedback Process

ACCES has established processes for receiving and responding to feedback on services. For persons with disabilities, the feedback processes are provided in accessible formats and with communication supports, upon request.

Our feedback processes are further detailed in the Accessible Customer Service Policy.

## Employment

ACCES is committed to fair and accessible employment practices.

ACCES will treat all persons equitably with respect to employment and provide employees with reasonable accommodation in employment as required. With reference to the Ontario Human Rights Code and AODA, the organization will, through the process of accommodation, enable employees to perform the essential requirements of their jobs in accordance with the principles of dignity, individualization, and inclusion. The organization will work cooperatively with all partners in the accommodation process and will assess and provide accommodation to employees on an individual basis.



## Recruitment and Selection

ACCES provides notice to its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment and selection processes. This notification appears on each posting.

Arranging suitable accommodation is determined by ACCES in consultation with the candidate and considers the candidate's accessibility needs due to disability. When making an offer of employment, the successful candidate is advised of ACCES policies for accommodating employees with disabilities.

## Supports for Employees

ACCES employees are informed of policies used to support employees with disabilities, including policies on the provision of job accommodations that consider an employee's accessibility needs due to disability. This communication is delivered as soon as practicable after commencement of employment and upon a request for accommodation.

When an employee with a disability requests accessible formats and communication supports, ACCES will provide or arrange the provision of accessible formats and communication supports in order to perform their job, and provide information that is generally available to employees in the workplace.

## Performance Management, Career Development, Advancement and Redeployment

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

## Accommodation Plans

ACCES 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.

ACCES will have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

## Return to Work Accommodation Plans Following Disability Leave

ACCES return to work process is for employees returning from disability leave who require disability related accommodation to facilitate their return to work. This will include workplace emergency response information, where applicable.



## **Workplace Employee Emergency Response Information**

ACCES provides employees individualized workplace emergency response information as requested or when made aware of the need for accommodation due to disability. ACCES 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.
- ACCES reviews overall emergency response policies.

With the employee's consent, ACCES will provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee who requires the assistance. **Please see Appendices for Employee Worksheet and Response Plan.**

### **Policy Administration**

This policy and its related procedures will be reviewed as required in the event of legislative changes, or changes to company procedures.

### **Plan Administration**

This plan will be reviewed on an ongoing basis and as required in the event of legislative changes, or changes to company procedures.

## Definitions

### Assistive Device

An assistive device is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that clients/visitors bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

### Disability

The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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 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*.

### Guide Dog

A guide dog is a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

### Service Animal

An animal is a service animal (including a service dog) for a person with a disability if:

1. the animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, because of visual indicators such as the vest or harness worn by the animal; or
2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
  - A member of the College of Audiologists and Speech-Language Pathologists of Ontario.
  - A member of the College of Chiropractors of Ontario.
  - A member of the College of Nurses of Ontario.
  - A member of the College of Occupational Therapists of Ontario.
  - A member of the College of Optometrists of Ontario.



- A member of the College of Physicians and Surgeons of Ontario.
- A member of the College of Physiotherapists of Ontario.
- A member of the College of Psychologists of Ontario; or
- A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

### **Support Person**

A support person means, in relation to a person with a disability, another person who accompanies someone to help with communication, mobility, personal care, medical needs or access to goods and services.

### **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.

## Integrated Accessibility Standards Regulation (IASR) Plan

Regulation/Topic	Target Date	Requirement	Status
<b>Integrated Accessibility General</b>	January 1, 2014	Develop Accessibility Policy for IASR including statement of commitment and post on website	Updated June 2021
	January 1, 2014	Develop multi-year accessibility plan and post on website	Updated June 2021
	January 1, 2015	Develop and deliver training program on IASR & OHR as it applies to disabilities	Ongoing as required
	March 12, 2026	Update IASR	Updated March 12, 2026
	January 1, 2031	Review requirements and update policy	
<b>Build Environment Design of Public Spaces Standards</b>	January 1, 2017, and ongoing	Follow accessibility standards for service counters, waiting areas on new builds and renovations	Ongoing as required
<b>Information and Communication</b>	January 1, 2016, and ongoing	Provide accessible formats and communication supports	Ongoing as required
	January 1, 2014	New websites and significant refresh meet WCAG 2.0 Level A	Complete
	January 1, 2021	All websites and content meet WCAG 2.0 Level AA	Ongoing as required
	January 1, 2012	Emergency procedures, plans or public safety information accessible to public	Ongoing as required
	January 1, 2015 & ongoing	Feedback processes available in accessible format with communication supports	Ongoing as required
	March 12, 2026	Republish policies and distribute to all employees	Complete
<b>Employment</b>	January 1, 2016 & ongoing	Recruitment and hiring processes provide accommodation	Ongoing as required
	January 1, 2016 & ongoing	Accommodation plans, RTW, Performance Management and Career development	Ongoing as required
	January 1, 2012 & ongoing	Employee Emergency Response Plans (CSR)	Ongoing as required



## Appendix A: Employee Memo

**Subject:** Employee safety during emergencies

At ACCES we take employee safety seriously.

If you have a disability, whether permanent or temporary, and may need help during an emergency, please let HR know. We will ask you to complete a self-assessment form, then work with you to develop individualized emergency response information that will meet your needs in an emergency situation.

Please note that we do not need to know the details of your medical condition or disability, only the kind of help you may need. The information you provide will be kept confidential and only shared with your consent.

If you have questions or you already have emergency response information and need to adjust it, please let me know.

Thank you.

Jennifer Hall, Vice President Human Resources



## Appendix B: Employee Emergency Information Worksheet

Please complete this worksheet to help us identify barriers that could arise in an emergency situation and provide suggestions on how to overcome them. Your input will help us provide you with individualized emergency information.

The information collected is confidential and will only be shared with your consent. You **do not** have to provide details of your medical condition or disability, only the type of help you may need in an emergency.

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Date:

### **Employee Information**

Name:

Department:

Telephone:

Email:

Mobile Phone:

### **Emergency Contact Information**

Name:

Telephone:

Email:

Mobile Phone:

Relationship:

### **Work Location**

1. Where do you work?

Address:

Floor:

Room Name/Number:

2. Do you work in different places on a regular basis?

Yes No

List the addresses, floors and room locations.

**Potential Emergency Response Barriers (Circle the correct response)**

3. Can you see or hear the fire/security alarm signal?  
Yes No Don't Know  
If no, what would help you know the alarm was flashing/ringing?
4. Can you activate the fire/security alarm system?  
Yes No Don't Know  
If no, what would help you sound the alarm?
5. Can you talk to emergency staff?  
Yes No  
If no, what would help you to communicate with them?
6. Can you use the emergency exits?  
Yes No Don't Know  
If no, what would help you to exit the building?
7. Does your mobility device fit in the emergency waiting area?  
Yes No Don't Know Not Applicable  
If no, what would help it fit, or is there a better location?
8. Could you find the exit if it was smoky or dark?  
Yes No  
If no, what would help you find the exit?
9. Can you exit the building by yourself?  
Yes No  
If no, what would help you to get out?
10. Can you get into an emergency evacuation chair by yourself?  
Yes No Don't Know N/A  
If no, what help do you need?
11. Would you be able to evacuate during a stressful and crowded situation?  
Yes No  
If no, what would help you evacuate?  
Instructions:



12. Can you read/access our emergency information?

Yes    No

If no, what would make this information available to you?

13. If you need help to evacuate, what instructions do people need to help you?

Instructions:

14. If you need other accommodations in an emergency, please list them here.

Accommodations:



## Appendix C: Employee Emergency Response Plan

### Instructions

Use the information collected in the employee emergency information worksheet to create individualized emergency responses for each employee with a disability. Feel free to modify the form if an employee needs different types of accommodations for different types of emergencies.

All information in this document is confidential and will only be shared with the employee's consent.

### Individualized Workplace Emergency Response Information for:

Name:

Department:

### Emergency Contact Information

Name:

Telephone:

Email:

Mobile Phone:

Relationship:

### Work Location (Repeat for other work locations)

Address:

Floor:

Room Name/Number:

### Emergency Alerts

\_\_\_\_\_ will be informed of an emergency situation by:

Name of employee

[Place an X by all that apply]

Existing alarm system \_\_\_\_\_

Pager device \_\_\_\_\_

Visual alarm system \_\_\_\_\_

Co-worker \_\_\_\_\_

Other (Specify): \_\_\_\_\_



**Assistance Methods**

List types of assistance (e.g. staff assistance, transfer instructions, etc.)

**Equipment Provided**

List any devices, where they are stored, and how to use them

**Evacuation Route and/or Procedure**

Provide a step-by-step description, beginning from the first sign of an emergency

**Describe Alternate Evacuation Route**

**Emergency Support Staff**

The following people have been designated to help the employee in an emergency:



**Name Location and/or Contact Information Type of Assistance**

**Consent to share individualized emergency response information**

I \_\_\_\_\_ (employee name) consent to ACCES sharing this individualized emergency response information with the individuals listed above, who have been designated to help me in an emergency.

Signature:

Date:

Form completed by:

\_\_\_\_\_  
Manager Name

\_\_\_\_\_  
Manager Signature

\_\_\_\_\_  
Date

For reviewed by:

\_\_\_\_\_  
Employee Name

\_\_\_\_\_  
Employee Signature

\_\_\_\_\_  
Date

Next review date: