

SAVE THE CHILDREN POLICY

Policy Title:	AODA	Department:	Human Resources
Category:	Human Resources	Reviewed and revised on:	April 2024
Approved By:	Director, People & Operations	Approved on:	April 2024
Effective Date:	April 2024	Next Revision Date:	April 2026
Revision Cycle:	Biannually		

1. Policy Statement

This policy is intended to meet the requirements of the Integrated Accessibility Standards, Ontario Regulation (IASR) 191/11 set forth under the Accessibility for Ontarians with Disabilities Act (AODA), 2005. This policy applies to the provision of accessible employment and other services for persons living with disabilities. All employment and other services provided by SCC shall follow the four core principles of AODA - dignity, independence, integration and equal opportunity.

2. Policy Scope

SCC is committed to providing a barrier-free environment for all stakeholders including our clients/customers, employees (inclusive of volunteers and consultants), job applicants, suppliers, vendors and any visitors who may enter our premises, access our information, or use our services. As an organization, we respect and uphold the requirements set forth under the AODA, and its associated standards and regulations.

2. Policy

SCC understands that we have a responsibility to ensure a safe, dignified, and welcoming environment for everyone and SCC is committed to ensuring our organization's compliance by incorporating accessibility legislation into our policies, procedures, equipment requirements, training, and best practices. The applicable policies will be reviewed annually, as organizational changes occur, or in anticipation of compliance deadlines. In addition, SCC continues to strive to meet the needs of individuals living with disabilities in a timely and effective manner.

SCC is committed to complying with the compliance framework for all accessibility standards under IASR applicable to SCC: Information and Communications, Employment, Customer Service.

Communication

SCC communicates with people living with disabilities in ways that take into account their disability. All SCC employees receive training on how to interact and communicate with people living with disabilities.

Our Information Technology websites meet the requirements of WCAG 2.0 Level AA. We train employees to communicate over the telephone in clear and plain language and to speak clearly and slowly. Our automated telephone answering system has an optional, extensive speech enabled menu. SCC also has TTY (text telephone) that lets people who are deaf, hard of hearing, or speech-impaired use the telephone to communicate, by allowing them to type messages back and forth to one another. We are committed to serving people living with disabilities who use assistive devices to obtain, use or benefit from our goods and services.



Internet, websites, and web content comply with the <u>Web Content Accessibility Guidelines (WCAG)</u> <u>2.0, Level AA</u>. These guidelines make websites more accessible for people who use computers differently because of their disabilities. People must be able to navigate websites using technologies that make browsing possible without certain actions, such as looking at the screen or clicking a mouse. For example, these technologies include:

- Speech recognition software
- Screen reader software
- Screen magnification software

Employment

SCC is committed to welcoming people living with disabilities with respect to recruitment, employment, training, career development and career progression and consistent with *Talent Acquisition and Retention* Policy.

Customer Service

Use of Service Animals/ Guide Dogs/ Service Dogs

SCC is committed to welcoming people living with disabilities who are accompanied by a service animal as needed, as well as providing training to all employees in how to interact with people living with disabilities who are accompanied by a service animal.

Support Persons

SCC is committed to welcoming people living with disabilities who are accompanied by a support person.

Facilities

SCC is committed to ensuring that our premises are welcoming and accessible to people living with disabilities and accommodate the use of assistive devices. As appropriate, we are willing to provide necessary alterations to our facilities to accommodate people living with disabilities.

Notice of temporary disruption

SCC will provide notice in the event of a planned or unexpected disruption in the facilities or services usually used by people living with disabilities. This notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if available.

Feedback process

The ultimate goal of SCC is to meet and exceed expectations of people living with disabilities. Comments regarding how well those expectations are being met are welcomed and appreciated by completing Appendix B and emailing to <u>info@savethechildren.ca</u>.

3. Roles and Responsibilities

Providing an accessible and barrier-free environment is a shared effort, and as an organization, SCC is committed to working with the necessary parties to make accessibility for all a reality.

Employer (SCC)

- Ensures development, implementation and maintenance of policies relevant to the standards under the IASR
- Ensures development and renewal of the statement of its commitment to meeting the accessibility needs of persons living with disabilities. This statement will be publically available.
- Establishes, implements, maintains and documents a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility

Save the Children

plans will be made available in an accessible format, upon request, and will be posted on SCC website. (Appendix A)

- Reviews accessibility plans every five (5) years and updated accordingly and in consultation with persons living with disabilities. If requested, the report shall be created in an accessible format.
- Provides training for its employees regarding the IASR and the *Ontario Human Rights Code* as they pertain to individuals living with disabilities. Training will also be provided to individuals who are responsible for developing SCC's policies, and all other persons who provide services or facilities on behalf of SCC.
- Ensures availability of Accessible Formats and Communication Supports for the employees upon request.

Employees

- New employees complete the training within the first two (2) weeks of commencing employment;
- Advise the employer if accommodation is needed.

Human Resources

- Ensures compliance at all levels with this and other policies governed by AODA and completion of the training;
- Ensures that all relevant practices, programs and policies including Performance Management, Talent Acquisition (Recruitment and Selection), Emergency Evacuation, Occupational Health and Safety, Managing Disability, Return to Work and Accommodation are consistent with AODA requirements;
- Ensures the training material is up to date, relevant and completed
- Ensures all are aware of the policies for employees living with disabilities and any changes to these
 policies as they occur;
- Consults with the employee making the request to determine the best way to provide the accessible format or communication support or any other accommodation as needed.

Word/Term	Definition	
AODA:	The Accessibility for Ontarians with Disabilities Act (AODA) seeks to ensure that all Ontarians have fair and equitable access to programs and services and to improve opportunities for persons with disabilities. The Act address barriers in Customer Service; Information and Communication; Employment; Transportation; the Design of Public Spaces.	
Accessibility	Accessibility refers to the design of products, devices, services, or environments for people who experience disabilities. Ontario has laws to improve accessibility for people living with disabilities, including the Accessibility for Ontarians with Disabilities Act (AODA), the <u>Ontario Human Rights Code</u> , and the <u>Ontario</u> Building Code.	
Accessible Formats	Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.	
Assistive Device	Is a technical aid, communication device or other instrument that is used to maintain or improve the functional abilities of people living with disabilities. Personal assistive devices are typically devices that customers 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.	
Barrier:	A barrier is a circumstance or obstacle that keeps people apart. For people living with disabilities, barriers can take many forms including attitudinal, communication, physical, policy, programmatic, social, and transportation.	
Communication Supports	Include but are not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.	

4. Definitions



Dignity Disability:	Policies, procedures and practices that respect the dignity of a person living with a disability are those that treat them as customers and clients who are as valued and as deserving of effective and full service as any other customer. They do not treat people living with disabilities as an afterthought or force them to accept lesser service, quality or convenience. Service delivery needs to take into account how people living with disabilities can effectively access and use services and show respect for these methods. A disability is a physical or mental condition that limits a person's movements, senses, or activities. The AODA uses the same definition of disability as the Ontario Human Rights Code.		
Guide Dog	Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the <i>Blind Persons' Rights Act</i> , to provide mobility, safety and increased independence for people who are blind.		
Equal Opportunity	Equal opportunity means having the same chances, options, benefits and results as others. In the case of services it means that people living with disabilities have the same opportunity to benefit from the way you provide goods or services as others. They should not have to make significantly more effort to access or obtain service. They should also not have to accept lesser quality or more inconvenience.		
IASR:	The AODA has five Standards which are included in the Integrated Accessibility Standards (IASR). These include the Customer Service, Employment, Information and Communication, Design of Public Spaces, and the Transportation Standard. The Act operates by bringing accessibility standards into regulation. Accessibility standards are laws that individuals, government, businesses, non-profits, and public sector organizations must follow in order to become more accessible. The accessibility standards contain timelines for the implementation of required measures and help organizations identify, remove, and prevent barriers in order to improve accessibility for people living with disabilities.		
Service Animal	An animal is a service animal for a person living 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, as a result 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: o A member of the College of Audiologists and Speech-Language Pathologists of Ontario; o A member of the College of Chiropractors of Ontario; o A member of the College of Occupational Therapists of Ontario; o A member of the College of Optometrists of Ontario; o A member of the College of Physicians and Surgeons of Ontario; o A member of the College of Physicians and Surgeons of Ontario; o A member of the College of Physicians and Surgeons of Ontario; o A member of the College of Physicians and Surgeons of Ontario; o A member of the College of Physicians and Surgeons of Ontario; o A member of the College of Physicians and Surgeons of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Physiotherapists of Ontario; o A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.		
Service Dog	As reflected in <i>Health</i> Protection and Promotion Act, Ontario Regulation 562 a dog other than a guide dog for the blind is a service dog if: • It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or		



	• The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.		
Support Person	A support person means, in relation to a person living with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.		
Independence	In some instances, independence means freedom from control or influence of others – freedom to make your own choices. In other situations, it may mean the freedom to do things in your own way. People who may move or speak more slowly should not be denied an opportunity to participate in a program or service because of this factor. A staff person should not hurry them or take over a task for them if they prefer to do it themselves in their own way.		
Integration	Integrated services are those that allow people living with disabilities to fully benefit from the same services, in the same place and in the same or similar way as other customers. Integration means that policies, practices and procedures are designed to be accessible to everyone including people living with disabilities. Sometimes integration does not serve the needs of all people living with disabilities. Alternative measures, rather than integration, might be necessary because the person living with a disability requires it or because you cannot provide another option at the time. If you are unable to remove a barrier to accessibility, you need to consider what else can be done to provide services to people living with disabilities.		

5. Cross Reference Policies/Procedures and Related Documentation

Talent Acquisition and Retention Policy Occupational Health and Safety Managing Disability, Return to Work and Accommodation Policy and Procedure Emergency Evacuation Procedure Communication Policy Accessibility for Ontarians with Disabilities Act, 2005 Integrated Accessibility Standards, Ontario Regulation 191/11 What is <u>AODA</u> Accessibility Services Canada

6. Policy Revision History

Version	Summary of Changes	Revised By	Revision Date
1	New policy	HR	July 2, 2016
2	Updated and reformatted (updated the definitions, transferred relevant material to other policies- OHS and Talent Acquisition; added a mandatory section of multi-year plan)	Senior HR Manager	February 11, 2020
3	Reviewed and updated in accordance with reporting and compliance timelines	Acting Senior HR Manager	June 19, 2021
4	Review and updated formatting	Director, People & Operations	April 24, 2024



APPENDIX A

Multi-Year Accessibility Plan

PREAMBLE

In 2005, the Government of Ontario passed the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Its goal is to make Ontario accessible by 2025. Accessibility standards are being created as part of the AODA. Originally the Ontario government had 5 separate "standards" to be implemented separately as part of the AODA (*Customer Service, Employment, Information and Communication, Transportation, Built Environment*). The Accessibility Standards for Customer Service was the first standard to become law as a regulation. In 2011, the following three standards - Employment, Information & Communications, and Transportation Standard have been combined into the AODA Integrated Accessibility Standard Regulation (IASR). This is now law and the requirements are being phased in between 2011 and 2025. An accessibility Standard for the Built Environment (buildings and outdoor spaces) is in development and not yet law.

The Integrated Accessibility Standards Regulation (IASR), under the AODA, requires SCC to meet general requirements as well as standards, which are applicable to SCC, and to develop and maintain a multi-year accessibility plan which outlines the organization's strategy for improving opportunities and accessibility for people with disabilities, while removing and preventing barriers, as required under the IASR.

ORGANIZATIONAL COMMITMENT

SCC strives at all times to respect the dignity and independence of all people living with disabilities. We are committed to providing a barrier-free environment for our employees, visitors, stakeholders and all other members of the public who enter our premises, access our information, or use any of our services. The commitment poster is reviewed, updated and posted annually.

SCC maintains commitment that new and existing SCC policies and procedures are developed, implemented and maintained as required to ensure we have achieved accessibility by meeting our obligations under the IASR and in meeting the needs of all people living with disabilities.

SCC maintains and reviews annually the AODA Policy and other policies that need to adhere to the IASR requirements.

SCC maintains commitment to make policy documents available to the public, in an accessible format, upon request.

SCC will ensure that all employees and any other persons engaging with the public and/or other people living with disabilities on behalf of SCC, will receive the appropriate training that meets the requirements under the IASR and in compliance with the Human Rights Code of Ontario. Training will be provided on hire and annually. SCC will keep records and ensure compliance with the training requirements.

SCC maintains a multi-year accessibility plan which provides a mechanism for planning, reviewing and evaluating the implementation of the IARS under AODA. In accordance with the requirements, SCC will:

- Post a copy of this plan on the corporate website (www.savethechildren.ca);
- Provide all information relating to the plan in alternative formats, upon request;
- Review and update the plan at least once every five years.



Comply with the required legislative compliance and file an Accessibility Compliance report by June 30, 2021 and every three years thereafter.

CUSTOMER SERVICE STANDARD

SCC is committed to adhere to the Customer Service Standard under the AODA, and will continue to improve on, maintain and report on this standard, as required under the legislation. SCC maintains the following measures for barrier-free access:

- Posting AODA Commitment Statement on SCC website;
 - Providing accessibility awareness, AODA and customer service standard training annually to all SCC employees, volunteers, contractors and any other persons engaging with population we serve, and/or other people living with disabilities, on behalf of SCC;
 - Providing annual training, tracking attendance and enforcing completion;
 - Through this training employees shall learn how to interact and communicate with anyone living with various types of disabilities; interact with anyone living with disabilities who use assistive devices; or require the assistance of a guide dog, service animal, or service dog; or require the use of a support person; use equipment or devices that may be available on the premises or that may assist people with disabilities, if any; assist people living with disabilities that may have difficulty accessing any of the services provided by SCC;
- Mandatory sign of on AODA policy for all employees;
- Emergency evacuation of visitors to SCC premises is in accordance with the SCC Emergency Evacuation Procedure.

EMPLOYMENT STANDARD

SCC is committed to fair and accessible employment practices that attract and retain talented employees with disabilities. In accordance with this standard and *Talent Acquisition and Retention and Managing Disability, Return to Work and Accommodation Policy and Procedure,* SCC commits to:

- Specify that accommodation is available for job applicants living with disabilities in job advertisements; accommodation if requested is made available to all applicants throughout the acquisition process;
- New and current employees are made aware of the AODA policy;
- Provide necessary accommodations that take into account employee's accessibility needs due to disability;
- Keep employees up to date on changes to policies and provide retraining where a change in policy has been made;
- Provide accessible formats and communication supports to any employee(s) on request including but not limited to:
 - Information that is needed in order to perform the employee's job;
 - Information that is generally available to employees in the workplace;
- Compliance with the *Managing Disability*, *Return to Work and Accommodation Policy and Procedure*, including provision and maintenance of the documented Individualized Plans such as:
 - **Individualized Workplace Emergency** plan including evacuation, in accordance with *Emergency Evacuation Protocol* (the emergency response plan, will be provided in an accessible format or with appropriate communication supports, upon request);
 - Individualized Return to Work and Accommodation Plan(s) after a period of illness in accordance with the Managing Disability, Return to Work and Accommodation Policy and Procedure;
 - Individualized Performance Assessment, Career Development and Advancement, and Redeployment (to be included in the Individualized Accommodation Plans and in accordance with the Managing Disability, Return to Work and Accommodation Policy and Procedure).



INFORMATION AND COMMUNICATIONS STANDARD

Information and communication sharing

SCC is committed to making information and communications accessible to all people living with disabilities. The information we provide and the ways we communicate with others is key to delivering our programs and services to our employees and/or people living with disabilities.

Access to information involves matters relating to format and availability of content, including the means of access and technologies associated with it.

SCC will incorporate enhanced accessibility to ensure that its information and communications systems and platforms are accessible and provided in accessible formats that meet the needs of people with disabilities.

SCC will take into account a person's disability when communicating or providing information to the person living with a disability and will provide the necessary information.

Feedback Processes

SCC will:

• Ensure that feedback processes are accessible via alternate formats and/or communication supports, upon request (Form - Appendix B);

Accessible Web Sites and Web Content

SCC will ensure that SCC internet websites and web content conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, such that:

- New websites and any new web content conform with WCAG 2.0 Level A by January 1, 2014;
- All websites and web content conform to WCAG Level AA by January 1, 2021 (other than live captions and audio descriptions).

Required legislative compliance: January 1, 2021

BUILT ENVIRONMENT STANDARD

The Accessibility Standards for the Built Environment in Ontario focus on removing barriers in two areas: public spaces; and, buildings. Although not official a law yet, SCC continues to be committed to greater accessibility in, out of, and around the buildings we use. We will continue to ensure that our office facilities incorporate the standards for barrier-free design as existing spaces are renovated and/or new spaces are obtained.



APPENDIX B

Accessibility for Ontarians with Disabilities Act Customer Feedback Form

Thank you for visiting our office. We value all of our customers and strive to meet everyone's needs.

- 1. Please tell us the date, time and location of your visit:
- 2. Did we respond to your customer service needs? Please explain below:

3. Was our customer service provided to you in an accessible manner? Please explain below:

4. Did you have any problems accessing our services? Please explain below:

- 5. Please add any other comments you may have:
- 6. Would you like to be contacted by SCC for further discussion: If so please provide your contact information below:

Please submit the form to

info@savethechildren.ca