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<b>Approved By</b>	Corporate Management Committee	<b>Users</b>	Reference "Scope"
<b>Approval Date</b>	December 11, 2013	<b>Distribution List</b>	All CMPA staff CMPA employee portal CMPA website
<b>Effective Date</b>	December 11, 2013	<b>Contact</b>	Manager, Executive Services and Governance
<b>Review Cycle</b>	Biennially from the last revised date		

### SUPPLEMENTARY INFORMATION

<b>Definitions</b>	<p><b>Accessible Formats</b> – formats that are an alternative to standard print and are accessible to people with disabilities. Accessible formats may include large print, Braille, and recorded audio and electronic formats such as CDs, DVDs, etc.</p> <p><b>Barrier</b> – anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice ("obstacle").</p> <p><b>Communication Supports</b> – supports that individuals with disabilities may need to access information and other supports that facilitate effective communications. Some examples include plain language formats, sign language, as well as reading out loud, captioning, or using written notes to communicate.</p> <p><b>Employee</b> – an individual in an employment relationship with the CMPA.</p> <p><b>Information</b> – the term information as it is used in the Information and Communications Standard refers to knowledge, data and facts that convey meaning and that exist in any format such as text, audio, digital or images.</p> <p><b>Internet website</b> – a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URL) and is accessible to the public.</p> <p><b>Mobility assistive device</b> – supports that assist with the mobility of an individual such as a cane, walker or similar aid.</p> <p><b>Persons with Disabilities</b> – individuals with a disability as defined under the <i>Ontario Human Rights Code</i>. Reference Appendix A for the <i>Accessibility for Ontarians with Disabilities Act, 2005 (AODA)</i> definition of "disability".</p> <p><b>Unconvertible information</b> – refers to some forms of information that may be difficult or impossible to convert into an accessible format (e.g. visual information in an x-ray or architectural blueprint may be lost in the conversion process).</p> <p><b>Support Person</b> – in relation to a person with a disability, refers to another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.</p>
<b>Related Documents</b>	<p>CMPA's Multi-Year Accessibility Plan</p> <p><i>Accessibility for Ontarians with Disabilities Act, 2005</i></p> <p><i>Accessibility Standards for Customer Services Ontario Regulation 429/07 and</i></p>



	<i>amending regulation 415/12 Integrated Accessibility Standards Ontario Regulation 191/11 and amending Regulation 413/12</i>		
<b>Change Log</b>	<b>Date</b>	<b>Author</b>	<b>Change Reference</b>
	December 2013	Manager, Executive Services and Governance	Policy creation with the amalgamation of the previous CMPA policy on Customer Service Standards CMC approval: December 11, 2013
	March 2015	Manager, Executive Services and Governance	Revisions to training, feedback, accessible website sections, and appendix B - timelines. CMC approval: March 31, 2015
	February 2016	Supervisor, Executive Services and Governance	Housekeeping amendment to the reference to the provincial ministry
	June 2016	Supervisor, Executive Services and Governance	Update to the customer service standard, references to training, support persons and service animals Managing Director, Enterprise Management approval: June 26, 2016

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## Statement of Policy

The CMPA is committed to treating all people in a way that allows them to maintain their integrity, dignity and independence and to provide an environment that fosters respect, integration and equal opportunity for our employees, members, stakeholders and the public. The CMPA is committed to being responsive to the diverse needs of its members, employees, and others, including those with disabilities, by striving to prevent and remove barriers to accessibility. The Association supports increased accessibility through its compliance with the requirements of the *Customer Service, Information and Communications, Employment, and Design of Public Spaces* standards of the *Integrated Accessibility Standards Regulation (IASR)* under the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*.

## Purpose

Under the *AODA* and its associated Standards, the purpose of this Policy is to outline the CMPA's commitment to the removal of barriers to accessibility, as outlined below:

- Attitudinal barriers
- Information or communications barriers
- Technology barriers
- Organizational barriers
- Architectural and physical barriers

This Policy provides the commitment and the Association's approach and direction regarding the legislation's accessibility requirements, which will be implemented within the compliance timelines outlined in Appendix B. Additional information can be found in the CMPA's multi-year accessibility plan.

## **Scope**

In accordance with the legislation and the definition of obligated organizations, the CMPA is a large organization (private or not-for-profit) that provides goods, services or facilities to the public, or to other organizations, and has 50 or more employees in Ontario.

This policy sets out accountabilities and responsibilities for the employees of the CMPA, as well as volunteers and third party contractors who provide goods and services on behalf of the CMPA to the public, its members, or other third parties.

The CMPA has current and ongoing obligations under the *Ontario Human Rights Code* respecting non-discrimination. This policy does not diminish in any way or detract from the CMPA's legal obligations with respect to people with disabilities as a result of any Act or otherwise imposed by law. Other statutes, such as the *Ontario Human Rights Code*, may well require more accommodation for persons with a disability than do the Act and its Standards.

## **General Accessibility Standards**

### ***Establishment of Accessibility Plans and Policies***

The Association shall maintain policies and procedures governing how the CMPA shall meet its requirements under the *AODA*. This Policy and related procedures and processes will be reviewed on a biennial basis, or earlier if required. The Association will provide policies in an accessible format, on request.

The Association shall produce a multi-year Accessibility Plan. The plan and accessibility policy will be posted on the Association's website and shall be made available in an accessible format and with communication supports, on request. Progress on the plan will be provided to the CMPA Council through the annual performance and financial reporting, as required. The Accessibility Plan shall be reviewed at least once every two (2) years, or earlier if required.

### ***Procurement or Acquiring Goods, Services or Facilities***

The CMPA is exempt from this requirement. However, when procuring services from a provider who will engage directly with the membership, the CMPA may incorporate accessibility requirements related to the service regarding the accommodation of persons with disabilities. The CMPA Statement of Work shall contain the following term, or a variation thereof: "Contractor and its employees and permitted subcontractors shall comply with all applicable laws, statutes, ordinances, by-laws and regulations, including those related to accessibility". If this is not practicable, the Association shall provide an explanation, on request.

### ***Self-Service Kiosks***

The CMPA is exempt from this requirement.

### ***Training***

All CMPA employees and volunteers shall receive training.

The training provided by the CMPA or on its behalf shall include but is not limited to the following:

- A review of the purposes of the AODA and the requirements of the *Accessibility Standards for Customer Service (Ontario Regulation 429/07)*
- A review of the requirements of the accessibility standards referred to in the *Integrated Accessibility Standards (Ontario Regulation 191/11 and any amending regulation)* and on the *Ontario Human Rights Code* as it pertains to persons with disabilities.

The training provided shall be appropriate to the duties of the employee or volunteer. Training shall take place as soon as is practicable. The Human Resources department shall ensure CMPA training records are maintained.

### ***Accessibility Reporting***

In accordance with the timelines provided in the Regulation, the CMPA shall file the required prescribed accessibility report with the appropriate provincial ministry, and shall post the report on the Association's website.

## **Customer Service Standards**

### ***Assistive Devices***

People with disabilities will be allowed to use their own personal assistive devices or services to access CMPA goods or services. CMPA employees, volunteers and third party contractors shall accommodate the use of personal assistive devices. The CMPA does provide some assistive devices (e.g. wheelchairs).

The CMPA website will indicate that the Association provides services that respect the independence and dignity of people with disabilities and offer services that include the use of assistive devices. The Association will post information in the reception area that welcomes the use of assistive devices and encourages users to seek support from employees as they require it.

The CMPA will ensure that employees and volunteers are trained and familiar with the various assistive devices that may be used by members with disabilities who are accessing CMPA services or other individuals who communicate with the CMPA and/or visit the CMPA's office.

### ***Service Animals***

The Association shall accommodate the use of service animals by people with disabilities who are accessing CMPA services unless the animal is otherwise excluded by law (e.g. the *Health Protection and Promotion Act* states that animals are not allowed in places where food is manufactured, prepared, processed, handled, served, displayed, stored, sold or offered for sale). If the service animal is excluded by law from the premises, the CMPA will look to other available measures to enable the person with a disability to obtain, use or benefit from the CMPA's services. In a situation where an animal cannot be easily identified as a service animal, the Association may ask the person to provide documentation from a regulated health professional.

### ***Support Persons***

Where a person with a disability accessing CMPA services is accompanied by a support person, CMPA employees, volunteers and third party contractors shall ensure that both persons are permitted to enter the premises together and shall ensure that the person with a disability can access the support person while on the premises.

In a situation where the CMPA might require a person with a disability to be accompanied by a support person for health or safety reasons, the CMPA would undertake prior consultation with the person with a disability to understand their needs, consider health or safety reasons based on available evidence, and determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

Generally the CMPA will not charge an admission fee in connection with a support person's presence at an event, however if it does, it will provide advance notice of the amount payable in respect of the support person. In a situation where the CMPA might require a person with a disability to be accompanied by a support person for health and safety reasons as outlined above, any admission fee for the support person would be waived.

### ***Notice of Service Disruption***

If there is a disruption in a particular facility or service usually used to allow a person with a disability to access services (e.g., temporary loss of elevator service), the CMPA will give notice of the reason for the disruption, the date(s) of disruption and a description of alternative facilities or services, if any, that are available. This posting will be in a conspicuous place on the premises of the affected building, or by other reasonable methods in the circumstances. If the disruption is anticipated, the CMPA will provide a reasonable amount of advance notice of the disruption. If the disruption is unexpected, notice will be provided as soon as reasonably possible.

### ***Feedback***

In accordance with the Customer Service Standard, feedback on accessibility of services by people with disabilities shall be invited, forwarded to the appropriate personnel, responded to, documented and tracked. Persons providing feedback will receive a response from the CMPA within 30 days of receipt of the feedback.

Feedback can be provided:

- (a) by mail
- (b) by telephone
- (c) in person
- (d) by email
- (e) through the CMPA website

In accordance with the Integrated Accessibility Standard, feedback processes involving members, the public, and employees will be provided in an accessible format or with the appropriate communication supports, on request. Examples include but are not limited to membership and employee surveys, evaluation forms, applicable sections of *myCMPA* and the CMPA website.

## **Information and Communication Support Standards**

### ***Accessible Formats and Communication Supports***

Except as otherwise provided by the AODA, the CMPA shall, on request, and in consultation with the person making the request, provide or make arrangements to provide accessible formats and communication supports for persons with disabilities. Accessible formats and communication supports shall be provided in a timely manner, taking into account the person's accessibility needs and at a cost that is no more than the regular cost charged to other persons.

This does not apply to products and product labels, unconvertible information or communications and information that the CMPA does not control directly or indirectly through a contractual relationship. If it is determined that information or communications are unconvertible, the Association shall provide the person requesting the information or communication with:

- an explanation as to why the information or communications are unconvertible;
- a summary of the unconvertible information or communications

### ***Communications***

Communication is a process of providing, sending, receiving and understanding information. CMPA employees, volunteers and third party contractors will communicate with people with disabilities in ways that take into account their disability. Where required, training will be conducted to ensure CMPA employees and volunteers know how to communicate with members and other persons with various types of disabilities. The employee and the person with a disability may agree upon the manner or format to be used for the document, information, or service requested (i.e. multiple formats or alternative service delivery for print and/or electronic documentation and services).

### ***Telephone Services***

The CMPA is committed to providing fully accessible telephone service to our members and other individuals.

Where required, the CMPA will offer to communicate with members and other persons by email, fax or mail, as appropriate, if telephone communication is not suitable to their communication needs or is not available. Members can also communicate with the CMPA through the secure access portal.

### ***Accessible Websites and Web Content***

Internet websites and web content controlled directly by the CMPA or through a contractual relationship that allows for modification of the product shall conform to the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0 at Level A and AA in accordance with the criteria and schedule set out in section 14 of the *AODA Integrated Accessibility Standard*.

### ***Emergency Procedures, Plans or Safety Information available to the Public***

The CMPA is exempt from this requirement.

### ***Educational and Training Resources and Materials, Training to Educators, Producers of Educational or Training Material, and Libraries of Educational and Training Institutions / Public Libraries***

The CMPA is exempt from this requirement.

### ***Documentation***

Documentation regarding accessibility at the CMPA, such as but not limited to the customer service feedback process, the Accessibility Policy, multi-year Accessibility Plan, and the accessibility reports, shall be maintained on the CMPA website and provided to individuals, on request, in the appropriate format.

# **Employment Standards**

## ***Recruitment***

The CMPA shall post information about the availability of accommodation for applicants with disabilities in its recruitment process.

## ***Recruitment, Assessment or Selection Process***

Job applicants who are individually selected for an interview and/or testing shall be notified that accommodations for materials to be used in the process are available, on request. The CMPA shall consult with any applicant who requests an accommodation in a manner that takes into account the applicant's disability.

## ***Notice to Successful Applicants***

Successful applicants shall be notified about the Association's policies for accommodating employees with disabilities as part of their offer of employment.

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

The Association will inform employees of the policies used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. The Association will provide this information to new employees as soon as practicable after they begin their employment and provide updated information to all employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability.

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

Upon an employee's request, the Association shall consult with employees to provide or arrange for the provision of accessible formats and communication supports for:

- a. information that is needed in order to perform the employee's job; and
- b. information that is generally available to employees in the workplace

## ***Workplace Emergency Response Information***

If an employee's disability is such that workplace emergency response information is necessary and the Association is aware of the need for accommodation, this information shall be provided to employees. In addition, this information shall be provided, with the employee's consent, to the person designated to provide assistance. The information shall undergo review when the employee moves to a different location, when the employee's overall accommodation needs or plans are reviewed, and when the Association reviews its general emergency response plan.

## ***Documented Individual Accommodation Plans***

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

## ***Return to Work Process***

The CMPA shall have in place a documented return to work process for employees returning to work due to disability and requiring disability-related accommodations. This return to work



process shall outline the steps that the Association shall take to facilitate the return to work, and use individual documented accommodation plans, where applicable.

### ***Performance Management, Career Development and Redeployment***

The CMPA shall take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans when providing career development, performance management and when considering redeployment.

## **Transportation Standards**

The CMPA is exempt from this requirement.

## **Built Environment Standards**

The Association shall comply with the *AODA Design of Public Spaces Standard* (Accessibility Standards for the Built Environment) when undertaking new construction and redevelopment of public spaces in the following areas, which are deemed applicable to the CMPA:

- Outdoor public use eating areas;
- Exterior paths of travel;
- Accessible parking;
- Obtaining services; and
- Maintenance of accessible elements

The *AODA* and its Regulations do not apply to Dow's Lake Court Inc., however compliance with the Accessibility Standards for the Built Environment will be encouraged.

## **Accountabilities and Responsibilities**

### ***Corporate Management Committee (CMC)***

- a. Sets corporate administrative policy and program direction.

### ***Operations Management Committee (OMC)***

- a. Implements corporate administrative policy and program direction from CMC.
- b. Monitors and ensures consistency in application of the Policy and related processes across the CMPA and within their departments.
- c. Reviews the policies and multi-year accessibility plan, as required.
- d. Undertakes the necessary activities to ensure compliance with the requirements associated with the *AODA* and its Regulations, as assigned.
- e. Receives and reviews applicable feedback related to customer service accessibility and ensures appropriate follow up with those providing the feedback, as assigned.
- f. Fosters an environment that reflects the statement and purpose of the Policy.

### ***Managers and Supervisors***

- a. Foster an environment that supports the statement and purpose of the Policy.
- b. Work in compliance with the Policy and related processes.

### ***Employees and Volunteers***

- a. Work in compliance with the Policy and related processes.

- b. Facilitate / attend and maintain records related to required accessibility training.

***Third Party Contractors***

- a. Comply with all applicable laws, statutes, ordinances, by-laws and regulations, including those related to accessibility.

## Appendix A - Definition

### *Accessibility for Ontarians with Disabilities Act, 2005*

“Disability” means,

- (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 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*; (“handicap”)

## Appendix B - Timelines

### Accessibility for Ontarians with Disabilities Act, 2005

CMPA Implementation – A large organizations (private and not-for-profit) with 50+ employees

COMPLIANCE YEAR (Jan 1 <sup>st</sup> )	REQUIREMENT AND REGULATION SECTION	STANDARD
<i>Integrated Accessibility Standards – Ontario Regulation 191/11</i>		
2012	Scope and interpretation (s. 80.45)	Customer Service
2012	Establishment of policies (s. 80.46)	Customer Service
2012	Use of service animals and support persons (s. 80.47)	Customer Service
2012	Notice of temporary disruptions (s. 80.48)	Customer Service
2012	Training for staff, etc. (s.80.49)	Customer Service
2012	Feedback process required (s.80.50)	Customer Service
2012	Format of documents (s. 80.51)	Customer Service
2012	Workplace emergency information, when an employer is aware of an employee's disability and need (s. 27)	Employment
2014	Accessibility policies (s. 3) Multi-year accessibility plan (s. 4)	General
2015	Training (s. 7)	General (Employment)
2015	Accessible feedback processes (s. 11)	Information and Communications
2016	Accessible formats and communication supports, upon request (s. 12)	Information and Communications
2016	Recruitment (s. 22-24)	Employment
2016	Employee accommodation (s. 25, 26, 28)	Employment
2016	Employees returning to work (s. 29)	Employment
2016	Performance management, career development and redeployment (s. 30-32)	Employment
2017	New or redeveloped public spaces (such as outdoor public use eating areas, exterior paths of travel, accessible parking, service counters) (s. 80.1 to 80.44)	Design of Public Spaces (accessibility standards for the built environment)
2021	All Internet website and web content conforms with WCAG 2.0 level AA (excluding live captioning and audio description). If a significant "refresh" of the CMPA website is conducted between January 1, 2014 and 2021, compliance with WCAG 2.0 level A will be required (s. 14).	Information and Communications
	General – Compliance (reporting, maintenance, etc.) (s. 81-86.1) Compliance reporting will be required every three years, with the first report filed by December 31, 2014	General

The following sections of the IASR are not applicable to the CMPA

Emergency procedure, plans or public safety information, upon request (s. 13)
<p>Educational and training resources and materials, upon request (s. 15)</p> <p>Training to educators (s. 16)</p> <p>Producers of educational or training material (s. 17)</p> <p>Libraries of educational and training institutions, Public libraries (s. 18-19)</p> <p><i>(In accordance with the definition of an obligated organization in section 15 (2) of the IASR, sections 15 to 19 are not applicable to the CMPA)</i></p>
<p>Procuring or acquiring goods, services or facilities (s. 5)</p> <p><i>(Requirement only applies to the Gov't of Ontario, the Legislative Assembly and designated public sector organizations)</i></p>
<p>Self-service kiosks (s. 6)</p> <p><i>(Not applicable)</i></p>
<p>Transportation (s. 33-80)</p> <p><i>(In accordance with the definitions of "conventional transportation service provider" and "specialized transportation service provider", sections 33 to 80 are not applicable to the CMPA)</i></p>
<p>Design of Public Spaces (s. 80.1-80.44)</p> <p><i>(Some areas of this component, such as recreation trails and beach access routes, and outdoor play areas, may not be applicable to the CMPA)</i></p>