

# ArtsBuild Ontario Accessibility Policy

## Policies and Procedures

### Statement of Commitment to Accessibility

ArtsBuild Ontario provides organizations with the training, tools and resources that support the development and management of healthy creative spaces and is committed to providing these resources in a welcoming and supportive environment for all.

ArtsBuild Ontario will identify, prevent and remove barriers to participation on an ongoing basis, working to meet (and where possible, exceed) the requirements of the Accessibility for Ontarians with Disabilities Act (AODA). The staff of ArtsBuild Ontario will provide reasonable and appropriate accommodations to promote inclusion and access for all.

### Integrated Accessibility Standards

The IAS is a six-part regulation including General Requirements, the Accessible Information and Communications Standards, the Accessible Employment Standards, the Accessible Transportation Standards, the Design of Public Spaces Standards and the Customer Service Standards.

ArtsBuild Ontario is required to be compliant with the General Requirements, the Accessible Information and Communication Standards, the Accessible Employment Standards and the Customer Service Standards by **January 1<sup>st</sup>, 2016** and **January 1<sup>st</sup>, 2017** respectively.

ArtsBuild Ontario has chosen to comply with additional standards that may exceed the requirements mandated by the AODA. Only those requirements in the IAS that apply to our organization have been included in this plan. If at any time during the period covered by this plan, we do take on business practices that expand the requirements that apply to us under the IAS, we will revise our plan accordingly.

## I. General Requirements

### Establishment of Policies and Plans

Section 1.3.1 of the IAS requires our organization develop, implement and maintain policies governing how the organization achieves or will achieve accessibility through meeting the requirements referred to in the Regulation. Section 1.3.2 states obligated organizations shall include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in their policies. These policy documents may or may not be written, must be made publicly available and provided in accessible format upon request.

Section 1.4.1 requires large organizations establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under the Regulation, post the accessibility plan on their website, if any, and provide the

plan in an accessible format upon request and review and update the accessibility plan at least once every five years.

As a small organization, **ABO must be compliant with Section 1.3.1 by January 1<sup>st</sup>, 2015**. ABO has chosen to comply with Sections 1.3.2 (Statement of Commitment) as additional standards.

ABO has met or is in the process of meeting the following requirements:

- ✓ A Statement of Organizational Commitment encompassing the principles of dignity, independence, integration and equal opportunity has been developed and will be made publicly available on our website and in accessible formats upon request.

ABO will continue to revise our Accessibility Policy on an ongoing basis and will make adjustments as necessary to continue to eliminate accessibility barriers.

## Training

**Section 7 of the IAS requires small organizations to provide training by January 1<sup>st</sup>, 2016**, on the requirements of the accessibility standards referred to in the IAS and on the Ontario Human Rights Code to all employees and volunteers, all persons who participate in developing the organization's policies and all other persons who provide goods, services or facilities on behalf of the organizations. In order to meet this requirement, ABO will:

- ✓ Utilize a training module approved by the Ontario Human Rights Commission and Accessibility Ontario to provide Customer Service Standard and IAS training to all employees and volunteers involved in delivering service.
- ✓ New employees will receive training on the Accessible Customer Service Standards Regulation, on the IAS and on the Ontario Human Rights Code during their orientation period or as soon as reasonably possible.
- ✓ Maintain records of training including dates completed.
  - ArtsBuild Ontario's staff completed the following modules:
    - The required topics for the Customer Service Standard training
    - General Requirements
    - Requirements of the Information and Communications Standard
    - Requirements of the Employment Standard
    - Requirements of the Design of Public Spaces Standard
    - Ontario Human Rights Code, as it relates to people with disabilities

This training was most recently completed on [December 14, 2017](#) by:

Lindsay Golds, Executive Director

Alex Glass, Program Manager

Eilidh Fisher, Programs and Communications Coordinator

This training was most recently completed on [January 17, 2018](#) by:

Luke DuCharme, Outreach Coordinator

## II. Information and Communication Standards

### Feedback

Section 2.11.1 of the IAS requires every organization have processes for receiving and responding to feedback and ensures these processes are accessible to persons with disabilities by arranging for the provision of accessible formats and communication supports upon request. Section 2.11.2 states organizations shall notify the public about the availability of accessible formats and communication supports.

**ABO is required to be compliant to this standard by January 1<sup>st</sup>, 2016.** ABO currently collects feedback:

- ✓ Via email and phone directly to staff;
- ✓ Through evaluation forms provided to workshop participants and attendees;
- ✓ Through surveys circulated to program participants and webinar registrants;
- ✓ Through complaints, compliments, or comments relayed to staff members.

To ensure compliance to this standard, ABO will:

- ✓ Continue to utilize our current formats of feedback and include on our website a statement that feedback can be made in alternative formats.
- ✓ Establish an internal process for managing feedback and working with individuals to respond in a manner that is timely and responsible to individual accessibility needs.
  - ABO's Program and Communications Coordinator will manage all requests for feedback in accessible formats and will record formats requested.
- ✓ Provide notice on the website advising whom to contact to request alternative feedback formats.
- ✓ Feedback regarding accessibility will be used in the revision of accessibility policies and plans.

### Accessible Formats and Communication Supports

Section 2.12.1 states obligated organizations must upon request provide or arrange for the provision of accessible formats and communication supports for people with disabilities in a timely manner and at a cost no more than the cost charged to other persons. Section 2.12.2 states the organization shall consult with the person making the request to determine suitable communication support and Section 2.12.3 states the organization must notify the public about the availability of accessible formats and supports.

As a small organization, **ABO must be compliant to this standard by January 1<sup>st</sup>, 2017.** To ensure compliance, ABO will:

- ✓ Upon request, provide or arrange to provide information in accessible formats and/or will provide communication supports for people with disabilities. Said information will be provided in a timely way at no additional cost, and will consult with the individual to ensure the most appropriate format and support.
- ✓ ABO will establish an internal process for managing requests and making arrangements for accessible formats and communication supports.
  - ABO'S Program and Communications Coordinator will manage all requests for accommodation and will make arrangements to provide accommodations in a timely manner, as approved by ABO's Executive Director.
- ✓ ABO will ensure that, upon request, communication supports such as a sign language interpreter are available for workshops and events.
- ✓ To ensure that ABO is able to provide a wide range of alternate formats and communication supports in a timely way, ABO will establish a record of alternate formats and communication supports so that there is a consistent, standardized and vetted resource list for all employees to access.

ABO will ensure that information about the availability of alternate formats and communication supports is shared with the public through our website.

### Emergency Procedure, Plans, or Public Safety Information

Section 2.13.1 of the IAS states that under the regulations set out in Section 2.12, if an organization prepares emergency procedures, plans or public safety information and makes the information available to the public, said information must be available in accessible formats or with appropriate communication supports upon request.

To ensure guest safety, ABO has chosen to comply with this additional standard by:

- ✓ Informing visitors and students of emergency and evacuation procedures.
- ✓ Having designated staff members aware of visitors who may require support in an emergency or evacuation situation.
- ✓ Notify emergency personnel of what supports may be required.

### III. Employment Standards

**ABO is required to comply with the Standards set out in Section 3 of the Integrated Accessibility Standards Regulation by January 1, 2017.**

## Recruitment

Section 3.22 of the IAS states that every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process.

Sections 3.23.1 and 3.23.2 require employer to notify job applicants that accommodations are available upon request in relation to any assessment process or materials used in the selection process and if an applicant requires accommodation, the employer will consult with the applicant to arrange for suitable accommodation that takes into account the applicant's accessibility needs.

ABO will continue to be compliant with this standard by:

- ✓ Continuing to notify applicants and the public that ABO is an equal opportunity employer and accommodations are available for applicants with disabilities via all online job postings.
- ✓ All job ads will state that if a candidate requires accommodations at any stage in the recruitment process they can contact us, and we will discuss how best to accommodate them.
- ✓ ABO will continue to notify job applicants who have been invited to participate in a recruitment, assessment or selection process that, where needed, accommodations for people with disabilities will be provided upon request. When an accommodation is requested, ABO will consult with the applicant and will provide or arrange to provide an accommodation that meets the applicant's needs.

In accordance with Section 3.24, ABO will, when making offers of employment, inform the successful applicant of our policies in accommodating employees with disabilities.

This notice will be included in ABO's letter of employment offer and employment contract.

## Informing Employees of Supports Available

Under Section 3.25 of the IAS Employment Standards, ABO will inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on arranging job accommodations that take into account an employee's accessibility needs due to disability.

ABO will:

- ✓ Inform new and existing employees of our policies for supporting employees with disabilities including providing employment-related accommodations for disabilities. Information will be provided through such means as newsletters, staff memos, e-mail and staff meetings, and in accessible formats upon request.
- ✓ New employees will be informed of this policy as part of their orientation process (Section 3.25.2)
- ✓ All employees will be given updated information 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 (Section 3.25.3)

Employees' privacy will be respected any sharing of information about their accommodation needs will be discussed with them and plans for communication made with their consent.

### Accessible Formats and Communication Supports for Employees

In addition to the compliance requirements and accompanying policy outlined in Section 2.12.1 and 2.12.2 (Accessible Formats and Communication Supports), in accordance with Section 3.26.1 ABO will also provide to employees:

- ✓ All information needed to perform that employee's job;
- ✓ Information that is generally available in the workplace;

In accessible formats upon request. ABO will comply with Section 3.26.2 by:

- ✓ Consulting with the employee making the request to determine a suitable accessible format or communication support.

### Workplace Emergency Response Information

Section 3.27.1 requires all organizations provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and the employer is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

ABO will continue to ensure employee safety by:

- ✓ Creating an emergency safety plan with the employee and their designated support person if necessary.
- ✓ Creating this plan upon new hire or as soon as employee informs organization of need for accommodations.

Individualized workplace safety plans will be revisited if the employee moves to a new location within the building, when their overall accommodation needs are reviewed and when the employer reviews emergency response policies.

### Individual Accommodation Plans

ABO has chosen to comply with Employment Standard Section 3.28.1 as an additional standard to ensure employee safety, performance and integration within the workplace. Under this standard, ABO will develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.

Under Section 3.28.2, the process for developing individual accommodation plans will include:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodations plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.

Under Section 3.28.3, ABO will ensure individual accommodation plans include:

- ✓ All information regarding accessible formats and communication supports provided as described in Section 3.26.1
- ✓ Individualized workplace emergency response information as described in Section 3.27.1
- ✓ Any other necessary accommodation as determined through consult with employee.

To maintain and respect employee privacy, all information included in individual accommodation plans will not be made private unless communication is made with employee consent.

### [Return to Work Process](#)

ABO is not required under the Integrated Accessibility Standards to develop and have in place a documented return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

ABO will take into account all individual accommodation needs should an employee require a leave of absence due to a disability and will facilitate the return to work process using individualized accommodation plans and consulting with the IAS Accessible Employment Standard.

### [Performance Management, Career Development and Advancement](#)

ABO will take into account the accessibility needs of employees with disabilities with regard to Performance Management and Career Development and Advancement, as required by Sections 3.30.1

and 3.31.1 of the Accessible Employment Standard, in a variety of ways, taking their accessibility needs into account, including:

- ✓ Providing performance plans in accessible formats as well as coaching and feedback.
- ✓ Provide training in accessible formats or with communication supports upon request.
- ✓ Fair and equal consideration of employees with accessibility requirements when opportunities for career development and advancement arise.

## Redeployment

When the situation arises, ABO will comply with Section 3.32.1 of the Accessible Employment Standards on redeployment by ensuring that accessibility needs for its employees with disabilities as well as individual accommodation plans are taken into account where reductions in workforce may mean job re-assignment, restructuring or alternate work arrangements.

## IV.2 Customer Service Standards

### Use of Service Animals and Support Person

Section IV.2 (or 4.80.42) outlines the accommodation of service animals and support persons at premises owned or operated by the provider of goods and services, or if the public or third parties has access to the premises.

ArtsBuild Ontario will accommodate service animals and support persons on the premises of 44 Gaukel if said support is required for the person with disability to obtain, use, and benefit from our goods and services.

ABO will:

- ✓ Ensure all guide dogs or service animals are permitted on premises – person accompanied must keep the animal with them at all times and is responsible for the supervision and clean-up of service animal (Section 80.47.2).
- ✓ If a person uses an Emotional Support Animal that is not a designated service animal, ABO will consult with the person to determine appropriate accommodation. Use of an ESA must be in accordance with Section 80.47.2
- ✓ If the service animal or ESA is excluded from the premises by law or other circumstances, ABO will provide reasonable accommodations to ensure other measures are available to enable the person to access our goods and services. (Section 80.47.3)
- ✓ ABO reserves the right to request a letter from a physician or nurse confirming the person requires the animal for reasons relating to a disability.

If a person is accompanied to our premises and/or any event hosted by ABO off the premises by a support worker, ABO will:



- ✓ Allow both persons to enter the premises together and will not prevent the person with disability from having access to their support person, if that person is necessary to the health or safety of the person with disability or others on premises.
- ✓ ABO will not charge admission for one support person attending classes, workshops, or events with a person with disability. Person with disability must pay the regular fees charged for one participant. If additional support is required, ABO will consult with all involved to determine fair access, if provided notice in advance.

### Notice of Temporary Disruptions

In accordance with the Integrated Accessibility Standards Section IV, if there is a temporary disruption to any facility or service of the provider or premise that would prevent a person with disabilities from being able to obtain, use, or benefit from our services in whole or part (such as an elevator), ABO will:

- ✓ Give notice of the disruption as soon as possible by posting in a conspicuous place on the premises, by posting on the website and/or social media channels if possible and by any other method that is reasonable in the circumstances.
- ✓ The posting must include the reason for the disruption, the anticipated duration and a description of alternative facilities or services, if available.

### Training for Staff

ABO will comply with Section 80.49 by ensuring the following persons receive training about the provision of its goods and services for people with disabilities:

- ✓ Every person who deals with members of the public or other third parties on behalf of the provider, whether the person does so as an employee, agent, volunteer or otherwise.
- ✓ Every person who participates in developing the provider's policies, practices and procedures governing the provision of goods or services to members of the public or other third parties.

The training provided must review the purposes of the Act as well as:

1. How to interact and communicate with persons with various types of disability.
2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
3. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods or services to a person with a disability.
4. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

ABO will ensure:

- ✓ Training is delivered using AODA-approved modules and content.
- ✓ Accessible Customer Service training is provided as soon as practicable to new employees.
- ✓ Records of training and dates completed are maintained.

- ✓ Training will be provided on an ongoing basis if changes are made to the policies, practices, and procedures governing provisions of goods or services to people with disabilities.

### Feedback Processes for Goods and Services

In compliance with Section 80.50 of the Integrated Accessibility Standard and Section 2.11 of the Integrated Accessibility Standard (Information and Communications Standard) ABO will establish a process for receiving and responding to feedback relating to customer service standards. To ensure compliance with this standard, ABO will follow the feedback policies laid out in Section 2.11 of the IAS as they apply to the delivery of service.

**This document is available in accessible formats upon request.**