



## Accessibility Policy

### 1.0 Purpose

This policy establishes Indspire's accessibility standards for customer service, information and communication, and employment, in accordance with The *Accessibility for Ontarians with Disabilities Act, 2005* and its Regulations, (AODA).

Indspire is committed to accessibility for persons with disabilities based upon the core principles of dignity, independence, inclusion, integration, responsiveness and equality of opportunity. We are committed to meeting the needs of persons with disabilities in a timely manner, and will do so by preventing and removing barriers to accessibility and meeting the accessibility requirements under the AODA. Indspire respects and supports the Ontario Human Rights Code.

### 2.0 Definitions

**Accessible Formats** means any form of large print, clear text, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities in order to conduct business with Indspire.

**Assistive Device** means a personal device used to assist persons with disabilities in carrying out activities and accessing Indspire's services. Personal assistive devices include walkers, white canes used by people who are blind or who have low vision, note-taking devices, personal oxygen tanks to assist breathing, speech synthesizers, TTYs (Telephone Typewriters or Telephone Teletypes) and computer technologies.

**Career development and advancement** includes adding responsibilities to an employee's current position and/or the movement of an employee from one job to another in the organization that may be higher in pay provide greater responsibility at a higher level in the organization or any combination of these.

**Client** means the subset of the general public to whom Indspire provides services in the ordinary course of our business.

**Communication Supports** means captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications in order to conduct business with Indspire.

**Disability** means:

- a) Any degree of physical 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 coordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog, 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;
- 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.

**Internet website** means a collection of related web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and is accessible to the public.

**Performance management** means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

**Redeployment** means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

**Service Animal** means any animal used by a person with a disability for reasons related to the disability where it is apparent that the animal is used by the person for reasons relating to his or her disability.

**Support Person** means a person who accompanies a person with a disability in order to assist him or her with communication, mobility, personal care, or medical needs or with access to Indspire's services.

**Web Content Accessibility Guidelines** means the World Wide Web Consortium Recommendation, dated December 2008, entitled "Web Content Accessibility Guidelines (WCAG) 2.0".

**Webpage** means a non-embedded resource obtained from a single Uniform Resource Identifier (URI) using Hypertext Transfer Protocol (HTTP) and any other resources that are used in the rendering or intended to be rendered together with it by a user agent.

### **3.0 Accessible Client Service Policy Providing Customer Service**

#### **3.1 Communication**

Indspire will communicate with persons with disabilities in ways that take into account their disability and enable them to communicate effectively for purposes of using, receiving and requesting Indspire's services.

Indspire will train its staff and agents who communicate with Clients on how to interact and communicate with persons with various types of disabilities.

### 3.2 Use of Service Animals

If a person with a disability is accompanied by a guide dog or other service animal, Indspire will ensure that the person is permitted to enter any Indspire office with the animal and to keep the animal with him/her unless the animal is otherwise excluded by law.

Where a service animal is excluded by law, Indspire will provide other measures to enable the person with the disability to obtain, use and benefit from the organization's services. If it is not readily apparent that the animal is a service animal, Indspire employees may ask for confirmation of the animal's status. It is not the practice of Indspire to unduly limit the access of animals to its premises.

It is the responsibility of the person with a disability to ensure that his/her service animal is under his/her control at all times.

### 3.3 Use of Support Persons

If a person with a disability is accompanied by a support person, Indspire will ensure that both persons are permitted to enter its premises, and that the person with a disability is not prevented from having access to the support person. Indspire may require the person with a disability to be accompanied by a support person when on Indspire's premises in the event that a support person is necessary to protect the health and safety of the person with a disability or the health and safety of others in the facility.

### 3.4 Use of Assistive Devices

Indspire will ensure that its employees are familiar with the use of assistive devices available on Indspire's premises, as appropriate to their duties, and inform its Clients of the assistive devices that are available.

A person with a disability may use his or her own personal assistive devices for accessing or using Indspire's services. Where the person's assistive device poses a health and safety risk to themselves or others on Indspire's premises, Indspire may request that the person use an alternative means for accessing the services, including any available assistive devices Indspire has onsite for these purposes.

It is the responsibility of the person with a disability to ensure that his/her assistive device is operated in a safe and controlled manner at all times.

In the event the person using an assistive device cannot access Indspire services, Indspire will accommodate the Client by using any other temporary measures available and deemed appropriate, such as, but not limited to, providing access to other methods, devices or a Support Person.

### 3.5 Notice of Temporary Disruptions

Indspire will provide notice of temporary disruptions in its services. The notice of disruption will include information about the reason for the disruption, its anticipated duration, and a description of any alternative services that are available. Notice will be made conspicuous and may be displayed at the location of the disruption, on the website, in a mailing or in a pamphlet. In the event of an unplanned disruption, advance notice may not be possible.

## **1.0 Information and Communication Policy**

#### 4.1 Website Accessibility

Any new internet websites or web-based applications (including when making significant modifications to these) that Indspire controls directly or through a contractual relationship that allows for modification of a product will conform to Web Content Accessibility Guidelines Level A.

Where possible, Indspire will publish new web content on its existing Internet website(s), which conforms to Web Content Accessibility Guidelines Level A. Indspire, continues to work towards increasing the accessibility of its existing web content, website(s) and web-based applications.

#### 4.2 Alternate Formats Available Upon Request

All organizational information is made available to Indspire's Clients, employees and the public in an accessible format or via accessible communication support upon request. Indspire will consult with the person making the request to determine the suitability of an accessible format or communication support provided. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

Indspire notifies its Clients and the public about the availability of accessible formats and communication supports through its website(s), through printed materials and through posted notice within Indspire's premises.

#### 4.3 Accessible Emergency Information

Indspire will provide emergency response information and assistance to its Clients and the public in an accessible manner upon request.

### **1.0 Employment Policy**

#### 5.1 Individualized Accommodation of Employees with Disabilities

Indspire will accommodate the needs of job applicants who require accommodation during the recruitment process.

Indspire will review the needs of employees with disabilities who request job-related accommodations. Employees requiring accommodation will be consulted when determining suitable accommodation, including the provision of accessible formats or communication supports.

Indspire has a written Accommodation Policy, which outlines the process for the development of documented individual accommodation plans (IAP) for employees with disabilities.

Employees can access the most current version of the Accommodation Policy in the Employee Handbook on the shared network drive or request a copy from their supervisor.

#### 5.2 Individualized Workplace Emergency Response Information

Workplace emergency procedures, plans and safety information are available to employees in an accessible format or via accessible communication support upon request. Timeframes for this information will be dependent upon the format requested but will be provided as soon as is practicable.

### 5.3 Individualized Emergency Response Plans for Employees

All Indspire employees with disabilities who may require assistance in an emergency are encouraged to identify their accessibility needs to their immediate supervisor so that individualized emergency accommodation plans can be created. Similarly, supervisors may inquire about the need for individualized emergency response plans where there is reasonable grounds to believe that the employee may have difficulty in responding to an emergency. This information will be maintained confidentially to the extent possible, except where disclosure is necessary to implement the individualized emergency response plan.

### 5.4 Applicant Accommodation in Recruitment and Selection

Indspire will notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process. Upon request, Indspire will make accommodation available in its recruitment process to applicants with disabilities, short of undue hardship. Applicants will also be accommodated, short of undue hardship, when they are individually selected to participate in an assessment or selection process.

### 5.5 Notice of Accommodation Availability to Employees

In addition to this Accessibility Policy, Indspire has an Accommodation Policy for accommodating employees with a disability. Employees can access the most current version of the Accommodation Policy in the Employee Handbook on the shared network drive or request a copy from their supervisor. Employees will receive updated information whenever there is a change to existing policies.

Indspire will notify successful applicants of its policies for accommodating employees with disabilities when making offers of employment, and provide information about policies used to support employees as applicable after they begin employment as part of the orientation program.

### 5.6 Accessible Formats and Communication Supports for Employees

Upon request, Indspire will provide accessible formats and communication supports to employees with disabilities to permit access to information they need in order to perform their job, as well as information that is generally provided to employees in the workplace. Accessible formats and communication supports will be provided short of undue hardship. The employee will be consulted to determine the suitability of accommodation to be provided or arranged by Indspire and these requirements will be documented in individual accommodation plans in accordance with Indspire's Accommodation Policy.

### 5.7 Return-to-Work Accommodation Plans

Indspire has a process for the development of return-to-work individual accommodation plans for employees returning to work who have been absent due to a disability and who now require accommodation.

### 5.8 Accommodation in Performance Management, Career Development and Advancement and Re-deployment

Indspire will ensure its performance evaluation process; career development and advancement opportunities; and redeployment processes are accessible to employees with disabilities. When an employee with a disability requests accessible formats or communication supports, Indspire will consult

with the employee and provide or arrange for the provision of suitable accommodation, short of undue hardship.

## **6.0 Training**

Indspire will train all persons it engages to deliver services to its Clients, as well as any person who is involved in the development and approval of policies, procedures and practices for the delivery of these services, as required by the AODA. The amount and format of training will be in relation to the person's level of interaction with Indspire's Clients.

All Indspire employees will also be trained on the rights and obligations of individuals under the Ontario Human Rights Code and the AODA with respect to issues relating to disability and accommodation of disability.

Further training will be provided to each person according to his or her duties as soon as is practicable.

Ongoing training will be provided in connection with changes to Indspire's policies, practices and procedures governing the provision of services to persons with disabilities.

Indspire employees who require training under the Customer Service regulations will be trained on the following information:

- i. a review of the purpose of the Accessibility for Ontarians with Disabilities Act, 2005;
- ii. the requirements of the Accessibility Standards;
- iii. instructions on Indspire's policies, practices and guidelines pertaining to the provision of service to persons with disabilities;
- iv. how to interact and communicate with persons with various types of disabilities, including the provision of alternate formats;
- v. review of different types of alternate formats and accessible communication supports;
- vi. what to do if a Client requests information in an alternate format;
- vii. how to interact and communicate with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person;
- viii. what to do if a person with a disability is having difficulty accessing Indspire's services; and
- ix. information about, and instruction on, the equipment or devices available on Indspire or agent premises as appropriate to assist in providing services to persons with disabilities, such as the Bell Relay Service.

A record of the dates on which training is provided and the individuals to whom it is provided will be maintained.

Indspire will review its training policies and programs as new requirements under the AODA become effective.

## **7.0 Feedback Process**

Indspire has a feedback process through which persons with disabilities are encouraged to comment on the goods and services they receive.

Feedback may be delivered to Indspire in person, by telephone, mail, e-mail, facsimile or such other means available to the person.

Privacy will be respected throughout the feedback process. All feedback will be reviewed for possible improvement in Indspire's goods and services and accessibility to its goods and services. Feedback will be directed to the most appropriate person within Indspire for dealing with it and any complaints will be addressed as soon as possible.

Clients can expect an acknowledgment of their feedback to be issued within two business days. The acknowledgment will indicate when the matter will be addressed and when the Client will be notified, further in the matter. Correspondence with the Client will take into account their accessibility needs and will be provided in an alternate format upon request.

Indspire will follow up with any required action within the timeframe noted in the acknowledgement.

The feedback process will be promoted on our website and through other outreach methods. A copy of the feedback process will be available upon request.

## **8.0 Availability of Documents**

Indspire will provide public notice of the availability of the documents required by the Accessibility Standards. Notice of availability will be provided on the website, through printed materials, and posted within Indspire's premises. Documents will be provided in an alternate format upon request. Policy documents will be provided, consistent with the requirements of the AODA and the Accessibility Standards.

## **9.0 Inquiries**

Any inquiries on this policy should be directed to the Finance and Administration Department.