

Chapter:	Human Resources	Policy #:	5.22
Section:	General	Effective Date:	December 9, 2013
Policy Title:	INTEGRATED ACCESSIBILITY STANDARDS REGULATION (AODA)	Approved By:	President & CEO
		Revised On:	May 17, 2021
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1. POLICY STATEMENT

- 1.1** It is the policy of Canadian Hearing Services (CHS) to treat all individuals with dignity and in a way to maintain their independence.
- 1.2** CHS believes in integration and is committed to meet the needs of individuals with disability in a timely manner by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act*. CHS' commitments are further defined in five areas as follows:
- Communication and Information
 - Employment
 - Built Environment
 - Transportation
 - Procurement and Partnerships

2. PURPOSE

- 2.1** The purpose of this policy is to set out standards that will guide all members of CHS on accessibility, how to treat everyone with independence, dignity, integration, and equality.

3. SCOPE

- 3.1** This Statement of Policy and Procedure applies to all CHS staff, clients, students, interns, contractors, and volunteers.

4. RESPONSIBILITY

- 4.1** Human Resources is responsible to oversee organizational compliance with the AODA IASR Policy and to lead implementation of the AODA IASR Multi-Year Plan 2013-2021 to its completion in 2021. Accessible formats of this document and multi-year plan are available free of charge upon request to Human Resources. For more information, please contact Human Resources at:

Phone: 1-866-518-0000, ext. 4070 TTY: 1-877-215-9530

Email: hr@chs.ca

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4.2 All employees are responsible to know and to follow the expectations in this policy in the provision of inclusive and accessible service and in working relationships with colleagues. Concerns must be addressed in an appropriate and timely manner as per protocols. The policy will be updated from time to time and all employees are required to be current in their knowledge, understanding, and training with respect to this policy.

4.3 Managers are further charged with the lead responsibility for identifying, removing, and preventing barriers in the provision of service and in the workplace. Concerns must be addressed in an appropriate and timely manner.

5. DEFINITIONS

“Plain language” is communication your audience can understand the first time they read it. Language that is plain to one set of readers may not be plain to others. No one technique defines plain language. Rather, plain language is defined by results - it is easy to read, understand, and use. Written material is in plain language if your audience can:

- Find what they need.
- Understand what they find.
- Use what they find to meet their needs.

6. PROCEDURE

6.1 Communication and Information

CHS is committed to meeting the information and communication needs of people with disabilities across mediums including website, print, sign language and alternative formats upon request. As needed, CHS will consult with people with disabilities or individuals to determine their information and communication needs.

6.2 Documents

Information will be written in plain language, formatted for accessibility and priority pieces will be translated into sign languages (ASL and LSQ).

To achieve plain language, use the simplest, most straightforward way of expressing an idea. Among the most common writing techniques include using:

- Logical organization with the reader in mind.
- "You" and other pronouns.

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- Active voice.
- Short sentences.
- Common, everyday words (you can still choose interesting words, but avoid complex or obscure words and instead use more common synonyms).

6.3 Formatting for Accessibility

Font

- Arial font is mandatory for all CHS documents (it is easier to read than serif fonts like Garamond or decorative ones like Script).
- All public documents must be 12 point or larger.
- Do not use ALL CAPS (mixing upper and lower case gives words shape, which makes them easier to recognize and read).
- Use bold instead of underlines or italics (as they can be hard to read).

Layout

- Chunk information into bulleted or numbered lists.
- Write clearly and use short sentences.
- Align text with the left margin (do not justify text as the extra spaces between words make it harder to read).
- Use wide margins and leave space between lines – ideally 25-30% of the point size (closely spaced text is hard to read).

Colour and Contrast

- High contrast is easy to read (black text on white or yellow is best).
- Do not use colour alone to convey meaning (for example, highlighting text to show its importance; use descriptive text or symbols instead).
- Do not use patterned backgrounds or print on glossy materials.

Digital documents

- Use tables instead of columns.
- Format your document using styles (like heading 1, heading 2) to help screen reader software.
- Do not use flashing images or text.
- Add a written description (or “alt tag”) to diagrams, images, or charts.

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- Captions, ASL and LSQ translations may also be appropriate (please review the Sign Language Policy for more information).
- Add a transcript for spoken content.

Presentations

- Organize your presentation so it is logical and easy to follow.
- Keep slides short - no more than three sentences per slide.
- Bigger is better - use at least 16-point font in presentations.
- Be ready with printed and electronic versions of the presentation (copies of your speaking notes can help too).
- Share your presentation in advance.
- If you use diagrams, sound or video, think about how to explain the content to someone who has visual requirements.

Signage

- Keep text short.
- Use common symbols or images to explain important information.
- Do not overlap words and images.
- Do not use shiny or reflective materials.
- Add raised elements that can be read by touch.
- Place the sign where it is easy to see from different heights.
- Make sure it is well lit.

Videos

Videos will be captioned. Additionally, original footage will be shot with visibility in mind. Clear lighting, unobscured body and facial movements, and smooth camera orientation will be encouraged. When selecting footage from third-party sources, videos which adhere to these standards will be preferred. Voice captioning will be provided for those with vision requirements.

Other formats

Upon request, other formats and/or communication supports will be provided. When it is not possible, we will provide the requestor with an explanation and summary of the information or communications.

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Exceptions

Information or communications that cannot be converted and products or product labels that CHS has no control over. However, CHS must still take into account a person's disability when communicating with them about their products, such as verbally informing a customer with vision loss about their DVD selection.

6.4 Websites

The December 2013 version of the CHS public website is required to meet or exceed the Working Group Web Content Accessibility Guidelines 2.0 Level A (WCAG 2.0 Level A) by January 1, 2014 and WCAG 2.0 Level AA by January 1, 2021. The exceptions are live captioning and pre-recorded audio descriptions.

The CHS internal website is not required to meet WCAG 2.0 Level A or AA. However, CHS will voluntarily apply the standards to our internal website as per regulations to the extent that is feasible.

Where website accessibility does not meet individual requirements and upon request, CHS will work with individuals in a timely manner to make the content accessible to them in some way. Employee accommodation plans may also address accessibility requirements with regards to CHS websites.

6.5 Emergencies

CHS will provide employees with disabilities with individualized emergency response information as requested. These plans will be reviewed to remain effective and up to date at least annually or in the event of a transfer or changes to the facilities, etc. If the employee also has a workplace accommodation plan, then both plans will be reviewed together.

Emergency closures will be communicated internally and externally according to the Office Closure policy. CHS will endeavor to maintain systems to contact disabled individuals to inform them of an emergency closure before they begin travelling to CHS; or as appropriate, to explain alternatives.

When developing emergency information, CHS will consider what would make it difficult for someone with a disability to read, see, hear, or understand.

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CHS is committed to providing customers and clients with publicly available emergency information in accessible formats upon request.

6.6 Training

CHS will provide training to employees and volunteers on Ontario's accessibility laws, the Ontario Human Rights Code, the *Accessibility for Ontarians with Disabilities Act*, and CHS policies as they relate to people with disabilities, as well as other related national legislation.

Training will be provided catered to the duties of employees and volunteers.

Training will be accessible and will be made available in alternative formats upon request.

6.7 Feedback

Upon request, Human Resources is responsible for ensuring that all existing external and internal feedback processes are accessible to people with disabilities.

CHS' website, documents, and signage will clearly inform users/readers that alternative formats for giving feedback are available upon request to Human Resources and that our employees are available to assist at any time.

Print materials such as surveys, etc., will include notice that accessible formats are available upon request to Human Resources.

6.8 Employment

CHS is committed to fair and accessible employment practices and opportunity for advancement for all people with disabilities, in addition to those who are culturally Deaf, oral deaf, deafened, and hard of hearing.

6.9 Employees with Disabilities

6.10 CHS will make all employees aware of how it will support them if they have a disability - or should they acquire a disability later in their career.

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Successful applicants will be informed in their letter of offer about CHS' policies on accommodating employees with disabilities. Workplace accommodation plans will be developed and documented.

6.11 Recruitment

CHS is an Equal Opportunity employer and job postings must advise applicants that, in accordance with the *Accessibility for Ontarians with Disabilities Act* and other legislation, CHS will provide accommodation, accessible formats and communication supports for the interview upon request.

CHS will measure its overall success rate of hiring persons with disabilities through collecting and assessing data gathered during its recruitment process.

6.12 Performance Evaluation, Career Development and Advancement

CHS will ensure that performance evaluations, career development and advancement opportunities are accessible to employees with disabilities according to their individual accommodation plans and accessibility needs.

6.13 Policies

Supporting accessibility policies are maintained by Human Resources and are available to all CHS' employees. CHS will update employees and volunteers whenever there are changes to these policies.

6.14 Built Environment

Kiosks

CHS will advocate with landlords and venues that we patronize for kiosks that are accessible to our employees and consumers. Lease and venue agreements must consider this requirement with a preference for achieving accessible kiosks whenever possible.

Design of Public Spaces

CHS will meet the Accessibility Standards for the design of public spaces when building new public space or making major modifications to our public spaces.

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Where we do not have control, we will advocate for accessibility unless the project is otherwise excluded under the law.

We will give proper notice in advance of service disruptions to accessible areas of our public spaces. Where a blockage is unavoidable, alternatives will be provided and communicated in advance.

Public spaces include:

- Service-related elements like service counters, fixed queuing lines and waiting areas.
- Accessible off-street parking.
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals. (This law does not apply to paths of travel that are regulated by Ontario's Building Code or are designed for a recreational experience.)
- Outdoor public eating areas like rest stops or picnic areas.
- Outdoor play spaces, like playgrounds in provincial parks and local communities.
- Recreational trails/beach access routes.

6.15 Transportation

CHS will advocate AODA transportation requirements where it makes sense to do so.

When groups travel together, consideration will be given to the needs of persons with disabilities with regards to booking travel whenever possible.

6.16 Procurement and Partnerships

CHS will incorporate accessibility design, criteria and features when procuring or acquiring goods, services, or facilities, except where it is not practicable to do so.

From time-to-time CHS may be requesting an AODA compliance report from other organizations as part of the decision-making process. This may make a significant impact on preventing new accessibility barriers and addressing existing ones especially as they relate to CHS' consumers.

7. ADDITIONAL INFORMATION

For more information about the AODA IASR legislation and regulations, please visit:

- English/French: <http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/>

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- ASL:
[https://www.mcass.gov.on.ca/documents/en/mcass/publications/accessibility/commAccessCommunicationDisabilities/Communication Access ENG.pdf](https://www.mcass.gov.on.ca/documents/en/mcass/publications/accessibility/commAccessCommunicationDisabilities/Communication%20Access%20ENG.pdf)
- http://www.e-laws.gov.on.ca/html/regss/english/elaws_regs_110191_e.htm
- Ontario Human Rights Code (captioned videos in ASL/English and LSQ/French)
<http://www.ohrc.on.ca/en/disability-and-human-rights-brochure>

8. RELATED POLICIES, TOOLS and REFERENCES

Number	Name of CHS Policy/Form
5.01	Access and Accommodation
5.04	Workplace Harassment
5.06	Self-Identification
5.07	Diversity
5.09	Religious Accommodation
5.10	Performance Appraisal
5.18	Accommodation Based on Family Status Policy
5.20	Accommodation on the Basis of Gender Expression or Gender Identity
5.21	Accessibility Standards – Customer Service (AODA)
5.23	Equal Opportunity
5.24	Communication Accessibility
5.26	Professional and Accessible Common Meeting and Work Areas
5.27	Education and Training Requirements
5.36	Educational Assistance
5.39	Sign Language
6.01	Health and Safety Principles
6.09	Workplace Violence
6.12	Scented Products in the Workplace
6.17	Service Animals
6.39	Return to Work Program

References:

A Guide to the Integrated Accessibility Standards Regulation: http://www.e-laws.gov.on.ca/html/regss/english/elaws_regs_110191_e.htm

Accessibility for Ontarians with Disability Act: Developing accessibility policies and a multi-year accessibility plan:

<https://www.ontario.ca/page/how-create-accessibility-plan-and-policy#:~:text=Under%20Ontario's%20Accessibility%20for%20Ontarians,50%20or%20more%20>

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[employees%20must%3A&text=Create%20written%20multi%2Dyear%20accessibility,websites%20C%20if%20they%20have%20one](#)

Employer's Toolkit: Making Ontario Workplaces Accessible to People with Disabilities:
https://www.conferenceboard.ca/docs/default-source/pdf_downloads/7159_accessibilitytoolkit-2015_rpt.pdf

Accessibility Directorate of Ontario <http://www.mcass.gov.on.ca/en/mcass/programs/accessibility/>

AccessForward: <http://www.accessforward.ca/>

Queen's University Accessibility Hub: <http://www.queensu.ca/accessibility/how-info>

This Policy Replaces	Not Applicable - update of existing policy.
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Approved by:

Dated:



Signature

May 17, 2021

Julia N. Dumanian
 President & Chief Executive Officer
 Canadian Hearing Services