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Title: **ACCESSIBILTIY POLICY**

Purpose: This policy has been implemented, in compliance with the *Accessibility for Ontarians with Disabilities Act, 2005*, by the YMCA of Owen Sound Grey Bruce (“YMCA” or “Association”) to foster inclusive YMCA environments and to ensure that any accessibility-related questions or concerns are addressed promptly and effectively through consistently applied procedures.

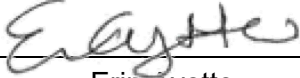
Policy Statement: The YMCA of Owen Sound Grey Bruce is committed to treating all people in a way that allows them to maintain their dignity and independence. We believe in integration and equal opportunity. We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the *Accessibility for Ontarians with Disabilities Act, 2005*.

In fulfilling our mission, we are committed to giving people with disabilities the same opportunity to access and benefit from our services, employment and volunteer opportunities, in the same place and in a similar way as other customers, employees and volunteers.

All information and communication materials and services provided by the Association shall follow the principles of dignity, independence, integration and equal opportunity.

Applicability: All full-time, part-time, short-term contract and casual salaried and hourly employees and volunteers in all locations, whether in management or non-management roles, working flexible hours or under hybrid office/remote-work arrangements. As well, all visitors, contractors, clients, members, and other members of the public.


Compliance Date: 2023-December 29 **Review Cycle:** Annually, unless otherwise required.

Prepared by: 

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April 9, 2024

 Date

Approved by: 

 Sarah Cowley
 Chief Executive Officer

April 9, 2024

 Date

(Document Owner)

The Document Owner is accountable for the content, implementation, and continuous improvement of this document.

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1. Process Description

1.1 General Obligations

Employer Obligations:

As an employer and community leader, it is our Association's responsibility to adhere to the tenants of the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA). As an employer and service provider, we will:

- Provide new employees and volunteers with a copy of this policy within 30 days of their start date and provide a copy of any revised or updated version of this policy to employees within 30 days;
- Ensure that AODA provincial reporting requirements are met on the implementation of Accessibility Standards for Customer Service;
- Ensure that mechanisms are put into place to support all staff in the implementation of this policy and responding to feedback, and monitor ongoing implementation;
- Ensure that the YMCA's policies, procedures and practices related to AODA are available to any person upon request;
- Respond to feedback and ensure that communications with persons with disabilities are done in a manner that takes into account their individual circumstances;
- Identify employee training needs with respect to AODA and implement related action plans;
- Ensure notices of temporary service disruption are communicated as outlined therein.

Employee and Volunteer Obligations:

It is the responsibility of all staff and volunteers uphold our shared commitment to service excellence. Further, employees and volunteers are to:

- Abide by this policy and any additional department provisions that may be in place, including supporting the implementation of Accessibility Standards by providing service to members that respects the dignity and independence of persons with disabilities;
- Immediately address, if it is safe to do so, instances where contraventions of this policy have been observed and/or bring the matter to the attention of a supervisor;
- Consult with their supervisor if they have any questions or concerns about this policy, and if a matter cannot be resolved within the supervisory structure of the employee's department, raise the matter with human resources;
- Participate in required training related to Accessibility Standards for Customer Service;
- Forward any feedback from members or customers regarding accessibility to their immediate supervisor for handling.



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Violations of this policy may result in disciplinary action being taken up to and including termination of employment or volunteer engagement.

1.2 Providing Goods and Services to People with Disabilities

The YMCA of Owen Sound Grey Bruce is committed to excellence in serving all customers including people with disabilities and will carry out our functions and responsibilities as detailed below.

1.2.1 Accessible Formats and Communication Supports

Unless deemed unconvertible, the YMCA will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities, upon request. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

The YMCA will take into account the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability. Available accessible formats include but are not limited to large print, electronic or hard copy, and verbal (can be read aloud/discussed in person or via telephone).

1.2.2 Billing

We are committed to providing accessible invoices to all of our customers. For this reason, invoices can be provided in various formats such as hard copy, large print and e-mail.

We will answer any questions customers may have about the content of the invoice in person, by telephone or e-mail.

1.2.3 Communication

We are committed to meeting the communication needs of people with disabilities. We will consult with people with disabilities to determine their information and communication needs and we will train staff and volunteers who on how to interact and communicate with people with various types of disabilities.

Note: Bell TTY (teletypewriter) Relay Service is available at 1-800-855-0511

- Bell TTY Relay service supports communication by phone between hearing people and people who are deaf, deafened, hard of hearing, or those with speech disabilities.
- Specially trained operators are available twenty-four (24) hours a day, seven (7) days a week.
- Find more information here: [Bell TTY Relay Service Information](#)



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1.2.4 Emergency Procedures

The YMCA is committed to providing customers with publicly available emergency information in an accessible way upon request.

We will also provide employees with disabilities with individualized emergency response information when necessary. For more information, see **section 1.4** below.

1.2.5 Websites and Web Content

The YMCA will ensure that our website and all web content published after January 1, 2014, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 in accordance with the schedule set out in the Integrated Accessibility Standards Regulation (IASR). This included our commitment to achieve or surpass the WCAG 2.0 Level AA by January 1, 2021.

1.2.6 Use of Assistive Devices

Persons with disabilities may use their own personal assistive devices while accessing our using our programs or services, and/or in the performance of employment or volunteer duties, in any premise owned, leased or operated by the YMCA. Where they can be, barriers to the use of assistive devices will be removed.

1.2.7 Use of Service Animals

Service animals are permitted to accompany any person with disability while accessing or using YMCA programs or services, and/or in the performance of employment or volunteer duties, in any premise owned, leased or operated by the YMCA, except where animals are excluded by law.

Where an animal is excluded by law from the premises or may affect the health and safety of customers, employees or volunteers, other measures will be explored in order to provide service to the person with the disability and/or allow them to carry out the performance of their employment or volunteer duties.

Where it is not readily apparent that an animal is a service animal, the YMCA may request a letter from a regulated health professional confirming that the animal is used by the person for reasons relating to his or her disability.

1.2.8 Use of Support Persons

Any person with a disability who is accompanied by their support person will be permitted to access and use a YMCA program or service with their support person.

In most cases, program fees shall be waived for the support person provided that the support person remains beside the person with a disability when accessing and using a program or



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service, and while moving through the building or on YMCA property. However, where a program or registration fee is charged and a portion of revenues are payable to a third party, or where a fee includes or covers such costs as food or accommodation, the support person may be required to cover these costs. If any amount is payable by the support person, the YMCA shall ensure that notice is given in advance about the amount, if any, that is payable in respect of the support person.

The YMCA may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health and safety of other users on the premises.

1.2.9 Notice of Temporary Disruption

The YMCA will provide customers with notice in the event of a planned or unexpected disruption in the facilities or services usually used by people 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.

Notice may be given by posting the information on the premises, on the YMCA website, voicemail messaging or by another other reasonable method.

Before visiting a YMCA program site, people are also encouraged to check the YMCA website or call the YMCA (519-376-0484) to find out if there is a disruption of program or service, and what if any alternative options exist.

1.2.10 Design of Public Spaces

We meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces as of January 01, 2017. Public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic area
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest area and accessible pedestrian signals
- Accessible off-street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

The YMCA of Grey Bruce takes steps to prevent and remove other accessibility barriers identified as soon as our organization is reasonably able to address the matter in a fiscally responsible manner. Such matters may be identified through:

- Through feedback processes
- Internal accessibility audits



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1.3 Training for Staff, Volunteers and Third Parties

The YMCA will provide training for all employees, volunteers and others who deal with the public or other third parties on their behalf, and all those who are involved in the development of customer service policies, practices and procedures.

Training will include the following, and will occur as soon as practicable upon hire and when policy, procedures or practices change. Alternate formats for training will be provided upon request:

When (at minimum)	Method/Topic / Resource	Applicable To	Proof of Completion Required?
Upon hire / commencement of volunteer engagement	Online: AODA Customer Service Standard http://accessforward.ca/	All.	Yes - Certificate
Upon hire / commencement of volunteer engagement	Online: AODA General Requirements http://accessforward.ca/	All.	Yes - Certificate
Upon hire / commencement of volunteer engagement	Online: AODA Information and Communications Standard http://accessforward.ca/	Directors, managers, supervisors, human resources and marketing, fund development and communications teams.	Yes - Certificate
Upon hire / commencement of volunteer engagement	Online: AODA Employment Standard http://accessforward.ca/	Directors, managers, supervisors, and human resources.	Yes - Certificate
Not Applicable	Online: AODA Design of Public Spaces Standard http://accessforward.ca/	Not Applicable	Not Applicable
Not Applicable	Online: AODA Transportation Standard	Not Applicable	Not Applicable



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	http://accessforward.ca/		
Upon hire / commencement of volunteer engagement	Online: Human Rights – Working Together: The Code and the AODA https://www.ohrc.on.ca/en/learning/working-together-code-and-aoda/certificate-version	All.	Yes - Certificate
Upon hire / commencement of volunteer engagement, and as soon as practicable when policy, procedures or practices change.	Online or In-Person: Organizational policy and/or procedure.	All.	Yes – Policy Acknowledgement Sign-Off and/or Certificate

The above noted training will include, but not be limited to:

- The purposes of the Accessibility for Ontarians with Disabilities Act, 2005 and the requirements of the associated standards;
- How to interact and communicate with people with various types of disabilities;
- How to interact with people with disabilities who use assistive devices or require the assistance of a service animal or a support person;
- What to do if a person with a disability is having difficulty in accessing the YMCA good and services;
- The YMCA’s policies, practices and procedures relating to the customer service standard.

1.4 Accessible Employment

We are committed to fair and accessible employment practices. We are committed to identifying, preventing and/or removing accessibility barriers related to employment in an on-going way, and in alignment with legislation, input from employees, service users and the community.

We strive to achieve fair, inclusive and accessible employment practices in all areas, including but not limited to the following.

1.4.1 Recruitment and Selection: We will accommodate people with disabilities during the recruitment, selection and hiring processes and welcome the public and existing staff participating in these processes to notify us of any accommodation needs. All job postings must include the following statement:

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- **The YMCA’s Commitment to Diversity, Inclusion and Equality:** The YMCA of Owen Sound Grey Bruce values the diversity of people and communities and is committed to excellence and inclusion in our Association. We are committed to an environment that is barrier free. If you require accommodation during the hiring process, please inform us in advance to arrange reasonable and appropriate accommodation.

1.4.2 Return to Work Process Overview: If an employee needs to take a disability leave, they are to inform their immediate supervisor and human resources. The employee and immediate supervisor will maintain regular contact, with the employee’s consent, to address any problems that may arise and facilitate the return to work process.

Depending on circumstances, the employee may:

- Return to their original position
- Return to their original position with accommodation(s) on a temporary or permanent basis
- Return to an alternate position on a temporary or permanent basis

The employee and immediate supervisor will work together to share information and find the most appropriate accommodation. General responsibilities and expectations include but aren’t limited to:

Immediate supervisors will:

- Maintain regular contact with the employee during their absence
- Provide the employee with return to work information
- Ensure safety is prioritized for the returning employee, and that the employee is returning to a safe work environment with safe work practices
- Assist in identifying accommodations
- Assist with analyzing the demands of each job task

Employees will:

- Get and follow appropriate medical treatment
- Be an active participant in the return to work process
- Provide updates about their progress, including information about their functional ability to perform job tasks
- Provide their health care provider with accurate return to work information

Health care providers, LTD insurance carriers, human resources and health and safety representatives may also participate in the process, if needed.

After identifying the most appropriate accommodation, safety considerations and any transitional measures, the details of the return to work place must be documented in **YMCA-**



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TMP-044 – Return to Work Plan, along with, as appropriate to the circumstances, **YMCA-TMP-015 – Individualized Accommodation Plan Template** and **YMCA-FORM-039 – Individualized Workplace Emergency Response Information**.

Additional details regarding our return to work process can be found in our Return to Work Policy.

1.4.3 Individual Accommodation Process Overview: When making an offer of employment, we will notify the individual that supports are available for those with disabilities as soon as practicable after they begin their employment (reference **YMCA-TMP-016 – Employment Offer Email Template** and **YMCA-TMP-017 – Email Welcome New Employee Template**).

Accommodations can be:

- Requested by the employee (via completion of **YMCA-FORM-043 – Request for Accommodation** and/or submission of a medical note);
- Identified by the employee’s immediate supervisor or human resources.

The employee is expected to be an active participant in the identification of their individual needs and developing their individualized accommodation plan. Information will be collected on the employee’s functional abilities (i.e. restrictions and limitations), not on their diagnosis.

The employee and their immediate supervisor, with the support of human resources, will work together to find the most appropriate accommodation. We will consult with employees in a manner that takes into account their accessibility needs due to disability. Medical or other experts may also be engaged at the Association’s expense to help determine if/how the employee’s needs can be accommodated.

After identifying the most appropriate accommodations(s), the details will be documented in writing via **YMCA-TMP-015 – Individualized Accommodation Plan Template**, and as appropriate, **YMCA-FORM-039 – Individualized Workplace Emergency Response Information**.

Plans will include what accommodations will be provided, how to make information accessible to the employee including accessible formats and communication supports, emergency response information, and when the plan(s) will be reviewed.

We will provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee’s accessibility needs due to a disability.

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The employee will receive a copy of the plan(s) in an accessible format (if required), or written reasons for denying the accommodation.

Additional details regarding our workplace accommodation process can be found in our Accommodation Policy.

1.4.4 Workplace Emergency Response Information: Where needed, we will also provide customized emergency information to help an employee with a disability during an emergency.

This information will be provided as soon as practicable after we become aware of the need for accommodation. To assist in this process, employees are strongly encouraged to complete the self assessment in **YMCA-FORM-039 – Individualized Workplace Emergency Response Information** and participate in the development of a customized action plan as soon as the need becomes apparent. This form is available in alternative formats and/or with communication supports upon request.

With the employee’s consent, we will provide workplace emergency information to designated persons who are providing assistance to that employee during an emergency.

All new hires will be introduced to the form within 7 days of their start date so that they can complete the self assessment and document an action plan with their supervisor.

Employees requiring accommodation at any point during their service (for example, they have notified their supervisor of such via medical note and/or have submitted a **YMCA-FORM-043 - Request for Accommodation Form**) is strongly encouraged to complete the form with their supervisor (in addition to a **YMCA-TMP-015 - Individualized Accommodation Plan**).

1.4.5 Performance Management: We will ensure the accessibility needs of employees with disabilities are taken into account within performance management, career development and redeployment processes.

1.4.6 Information Security: The employee’s personal information, including medical information, will be kept secure and dealt with in a confidential manner, and will only be disclosed to individuals who need it to perform the accommodation process. Hard copy documentation will be kept secure in locked cabinets and electronic documentation will be kept secure on password protected networks. Online work groups are permission based and access is only via direct invitation.

1.4.7 Review of Accessibility Plans: Accessibility plans, inclusive of but not limited to return to work, individualized accommodation and emergency response plans will be monitored and reviewed to ensure effectiveness. The immediate supervisor and the employee will participate in reviews, as will other parties as appropriate, including but not limited to human resources, health care providers and LTD insurance carrier.



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At minimum, plans will be reviewed:

- When the employee transfers roles and/or moves to a different location
- When the employee's overall accommodation needs are reviewed, and/or there is a change in the employee's restrictions/limitations;
- When the Association's emergency response policies and procedures are reviewed and/or updated.

1.4.8 Accessible Formats: All documentation related to employment, including but not limited to policies, forms and accessibility, return to work and emergency response plans, will be made available in accessible formats and/or with communication supports, upon request. Accessible formats include but are not limited to large print, electronic or hard copy, and verbal (can be read aloud/discussed in person or via telephone).

1.5 Feedback Process and Document Availability

The ultimate goal of the YMCA is to meet and surpass employee, volunteer and customer expectations. Feedback regarding how well those expectations are being met are welcome and appreciated.

Feedback regarding our accessibility and/or how the YMCA provides goods and services to people with disabilities can be made:

- Verbally, in person or by telephone;
- In writing, by e-mail (humanresources@osgb.ymca.ca), mail by post, private message on our social media channels, or other means.

Staff will respond as promptly as possible. Our Complaints Policy is also available to guide the process.

Our Accessibility Compliance Reports, Multi-Year Plan and Accessibility Policy are available for download from our website at <https://www.ymcaowensound.on.ca/accessibility/>

Should this information be required in an alternate format, including but not limited to hard copy, large print or verbal, please contact us at:

- Phone: 519-376-0484 (ask for Human Resources)
- Email: humanresources@osgb.ymca.ca

1.6 Modifications to this or other Policies



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We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact of people with disabilities.

Any policy of the YMCA that does not respect and promote the dignity and independence of people with disabilities will be modified or removed.

1.7 Multi-Year Accessibility Plan

The YMCA has established and implemented a multi-year accessibility plan that outlines our strategy to prevent and remove barriers and meet our requirements as per the *Accessibility for Ontarians with Disabilities Act, 2005* and applicable standards. This plan is available through our website and, upon request, will be provided in an accessible format that takes into consideration the needs of the individual requesting it.

Our Multi-Year Accessibility Plan is reviewed at minimum, every five (5) years by management, inclusive of our Chief Executive Officer (CEO), Human Resources and Communications, with final review and approval by the CEO. Review meetings are booked in advance to ensure maximum inclusivity and participation.

1.8 Questions about this Policy

This policy exists to achieve service excellence to customers with disabilities. Questions about this policy or its purpose should be referred to any Supervisor, Manager or Program Director of the YMCA.

1.9 Resources Available

The YMCA's policies, practices and procedures related to *Accessibility for Ontarians with Disabilities Act, 2005* are available to the public upon request. Where a request is made for a document by a person with a disability, the YMCA shall provide the document or the information contained in the document in a format that takes into account the person's disability.

Other resources available to the general public are include:

- The *Accessibility for Ontarians with Disabilities Act, 2005* or related standards (www.e-laws.gov.on.ca and <https://www.ontario.ca/page/accessibility-in-ontario>);
- Training resources (<https://www.accessforward.ca/>)

2. Definitions and Acronyms

2.1 Definitions

Accessible Formats – may include but are not limited to large print, electronic formats and other formats usable by persons with disabilities.



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Accommodation – is a way, through reasonable efforts or measures, of preventing or minimizing barriers that impede a person with a disability from fully participating in the services offered.

- Example: Accommodation means permitting a member or program participant to use their personal assistive device, or to be accompanied by their support person or their service animal, in order to increase accessibility to YMCA programs.

Assistive Device – is any device is any device that helps a person with a disability to do everyday tasks and activities. Assistive devices include, but are not limited to, digital audio players, hearing aids, teletypewriters (TTY) for people unable to speak or hear by phone, mobility devices (scooters, walkers or crutches, canes/white canes, etc.), oxygen tanks and speech generating devices.

As Soon As Practicable - as soon as possible and practical, after taking into consideration the facts and conditions of each individual circumstance and the parties that need to be involved.

Barrier – is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This may include architectural or physical barriers, an information or communications barrier making it difficult for people to receive or send information, and attitudinal barrier, a technological barrier, or a policy or practice.

Communication Supports – may include but are not limited to alternative and augmentative communication supports, plain language, and other supports that facilitate effective communications.

Customer – is any person who uses the services of the YMCA.

Disability – means (source: *Accessibility for Ontarians with Disabilities Act, 2005*, section 2):

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defects or illness;
- A condition of mental impairment or a developmental disability;
- A learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- A mental disorder; or
- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Service Animal – Is any animal being used by a person for reasons relating to his or her disability, and it is readily apparent or is supported by a letter from a regulated health professional.



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Support Person – is another person who accompanies a person with a disability to help with communication, mobility, personal care or other medical needs or with access to programs and services offered by the YMCA.

2.2 Acronyms

AODA - *Accessibility for Ontarians with Disabilities Act, 2005*

IASR – Integrated Accessibility Standards Regulation

3. Associated Records

Record	Retention	Record Repository
2023-2025 Multi-Year Accessibility Plan	Ongoing	External Website; Internal Teams

4. Revision Summary

Rev. 00 - 2023-12-29 – Annual review and minor updates.

Rev. 01 – 2024-02-22 – Section 1.5 Feedback Process and section 1.7 Multi-Year Plan updated; PDF Accessibility Checker completed.

Rev. 02 – 2024-04-09 – Sections updated/added: 1.2.4 Emergency Procedures; 1.3 Training for Staff, Volunteers and Third Parties; 1.4 Accessible Employment; 1.5 Feedback Process and Document Availability; 2.1 Definitions