

<b>Accessibility for Ontarians with Disabilities (AODA) (Policy #17)</b>			
Date Implemented:	January 1, 2012	Approved by:	Board of Directors
Date Last Reviewed:	June 25, 2021	Approved by:	CEO

## **Commitment to AODA**

Blue Door is committed to providing excellent customer service. We are committed to providing a barrier-free environment for our clients, employees, volunteers, job applicants, visitors, community partners, staff and other stakeholders who enter our premises and access our information and services. All services provided by Blue Door shall follow the principles of dignity, independence, integration and equal opportunity. To achieve this, we recognize the diverse needs of people who are homeless or at risk of being homeless, community members accessing our services and strive to provide services and facilities which are accessible to everyone, including those with disabilities. Blue Door is committed to providing clients, staff, volunteers, community partners, stakeholders and other visitors 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. As an organization we respect and uphold the requirements set forth under the Accessibility for Ontarians with Disabilities Act (2005), Customer Service Standard, and Integrated Accessibility Standards for Information and Communications, Employment, Transportation, and once established, Standards for the Built Environment.

**Policy:** For the purpose of this policy disability includes 'any previous or existing mental or physical disability and includes disfigurement and previous or existing dependence on alcohol or a drug' (Canadian Human Rights Act, Section 25). A more comprehensive definition of disability can be found in the definitions section of the Staff Manual. This policy is intended to meet the requirements of the Accessibility for Ontarians with Disabilities Act, 2005 and the standards included therein including the Customer Service Standards and the Integrated Accessibility Standards, Ontario Regulation 191/11 for Information and Communication and Employment Standards.

Blue Door will make all reasonable efforts to provide the same level of service to all people no matter their ability/disability. As well, we will work to provide all individuals with equal opportunity to obtain, use or benefit from our services. Service will be provided in a manner that respects the dignity and independence of all individuals.

Blue Doors Accessibility for Ontarians with Disabilities Act policy will be reviewed as often as is necessary, but at least annually, by the Board of Directors.

## **Customer Service**

The first standard developed under the AODA is the Customer Service standard which details specific requirements for all service providers regarding provision of goods and services for person with disabilities. Such as:

- undertaking a review of policies, practices and procedures;

- training staff including temporary or contract and volunteers;
- providing information in an alternate format;
- facilitating the use of assistive devices, service animals and support persons;
- developing a communication strategy for temporary disruption;
- developing a feedback process.

Blue Door recognizes the diversity of the community it serves and is committed to ensuring that all members of the community have access to and the ability to participate effectively in our services

Blue Door provides service to persons who may have characteristics or needs resulting from a disability that may pose a barrier to the person's ability to access or participate in services as generally delivered by Blue Door. These needs or barriers may raise issues of accommodation and/or accessibility. Blue Door has an obligation and is committed to resolving, where possible, any barriers that limit, impede or frustrate any person's ability to access or participate effectively in our services and processes.

The procedures that follow this policy govern the provision of Blue Door services to persons with a disability and were developed to assist Blue Door employees in understanding expectations concerning their respective roles and responsibilities dealing with related accommodation and access requirements that may be required by persons with a disability.

### **Employment Standard**

The Employment Standards regulation will expand Ontario's labour pool by ensuring people with disabilities are welcome and supported within all workplaces. Employment standards will assist organizations with employment recruitment, providing accessible information, plans for emergencies, individual accommodation, return to work, performance management, and career development and redeployment.

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, the procedure which follows this policy will address:

- I. Recruitment, Assessment and Selection
- II. Accessible Formats and Communication Supports for Employees
- III. Documented Individual Accommodation Plans
- IV. Plans and Processes
- V. Return to Work and Redeployment

### **Information and Communication**

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, the procedure which follows this policy addresses:

- I. Accessible Formats and Communication Supports
- II. Accessible Websites and Web Content
- III. Education and Training Resources
- IV. Emergency Procedures, Plans or Public Safety Information
- V. Exceptions
- VI. Feedback

### **Non-Compliance with Policy**

All Blue Door staff and volunteers are expected to comply with this policy. Any individual who fails to comply with this policy may be subject to disciplinary action.

**Procedures:**

**Customer Service Standard:**

This Customer Service standard applies to all Blue Door employees, clients, community partners, volunteers, staff, stakeholders and third party contractors who deal with the public on behalf of Blue Door.

Blue Door will use reasonable efforts to ensure that its policies, practices and procedures are consistent with the following principles:

1. That service is provided in a manner that respects the dignity and independence of persons with disabilities.
2. The provision of services to persons with disabilities is provided in a manner that allows the person with a disability to benefit from the same services, in the same place, and in the same or similar way as others, unless an alternate measure is necessary, to enable a person with a disability to access service.
3. Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from the services.

Blue Door shall notify and provide upon request by any person, documents describing its Customer Service policies, practices and procedures. Blue Door will provide these requested documents or the information contained in the document, in a format that takes into account the person's disability. Blue Door and the person with a disability may agree upon the format to be used for the document or information.

No changes will be made to this Customer Service policy before considering the impact on people with disabilities. In the development and revision of current policies, the AODA legislation and intent shall be considered and included.

This Customer Service standard exists to achieve service excellence to service recipients and stakeholders with disabilities. If anyone has a question about the policy, or if the purpose of a policy is not understood, an explanation should be provided by, or referred to Human Resources.

The Customer Service Standard applies to all premises owned and operated by Blue Door and must be considered when service is provided outside the premises.

Blue Door is committed to ensuring that issues of accommodation and accessibility identified in connection with the delivery of our services are addressed in a manner that facilitates effective access to and participation in Blue Door's services.

Blue Door is committed to the following in connection with ensuring equal access to and participation in our services:

- A commitment to identify, assess and respond to the accommodation or accessibility issues identified by individuals accessing or participating in our services.
- The removal of barriers relating to accessibility and accommodation issues identified by participants in Blue Door services including but not limited to physical barriers, informational barriers, communications barriers.

Each Blue Door representative will demonstrate sensitivity and responsiveness to any accommodation or accessibility issues that come to their attention in the course of any service delivery activity, including broader community communication and interaction:

- Whenever a person identifies a barrier that limits their ability to participate in Blue Door services, Blue Door representatives will promptly communicate our commitment to address the relevant accommodation and/or accessibility issues.
- When a Blue Door representative identifies a barrier that limits an individual's ability to participate in our services, we will raise the issue with the person experiencing the barrier and confirm our commitment to resolving the situation.

Where barriers are reported or identified, we will engage the person experiencing the barrier in a discussion so as to understand the following:

- the precise nature and source of the barrier;
- the impact of the barrier on the person's ability to participate in our services.

Once the specific impact of the barrier on the person's ability to participate in our services is understood, a Blue Door representative will assess what is required to resolve the presenting barrier in consultation with the immediate supervisor; where appropriate, the Supervisor will seek advice from relevant departments and develop proposed steps for addressing the identified barrier.

Blue Door representative shall communicate to the person experiencing the barrier the steps proposed to accommodate or resolve the accessibility issue.

Blue Door agrees to examine needs on a case by case basis and make every effort to accommodate each individual need where possible.

In support of the customer service standards Blue Door has developed the following procedures:

#### **I. Service Provision**

The policy aims to ensure that people with disabilities are given the same chance to obtain, use or benefit from services provided by Blue Door. This will be done by:

- a) Ensuring that all individuals receive the same opportunity, value and quality when accessing services.
- b) Allowing people with disabilities to do things in their own way, and at their own pace when using Blue Door services (as long as there is no safety risk present).
- c) Finding different ways to provide services to ensure that people with disabilities have

access to the same services, in the same place and in a similar manner.

- d) Communicate with a person with a disability in a way that takes the persons disability into account.

## **II. Assistive Devices**

People with disabilities may use their own personal assistive devices, or those which may be offered by Blue Door, while accessing services provided by Blue Door. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure access to services. Blue Door will ensure that staff are trained and familiar with various assistive devices that may be used by persons accessing our services

## **III. Service Animals**

Persons with a disability using Blue Door services may choose to be accompanied by service animals. If it is not obvious that the animal is a service animal, confirmation may be requested. Service animals are not allowed in food preparation areas (as per Public Health regulations) and additional restrictions may be put in to place due to Health and Safety needs (i.e. in cases of severe allergies of other individuals). When service animals are not allowed by regulations or for health and safety reasons, staff will provide a reason why the Service Animals are not allowed and will work with the person to find other ways to access services.

People accompanied by service animals are responsible for the care and supervision of their service animals. Blue Door will not accept responsibility for service animals' care while the animal is on the premises. It is the owner's responsibility to make arrangements for their animals' care.

## **IV. Support Persons**

Support persons are allowed to accompany any person with a disability while accessing Blue Door services. If a person with a disability is assisted by a support person they may be provided with a temporary bed in the client's room. Provision of a bed will be dependent on program occupancy.

## **V. Notice of Temporary Disruptions in Service**

Blue Door will provide notice in the event of a planned or unexpected disruption in the facilities or services used by persons with disabilities. Notice of unexpected disruptions will be provided as soon as is reasonably possible. Notices will include information about: the reason for the disruption, how long the disruption is expected to last, and a description of any available alternative facilities, services or resources.

At a minimum Blue Door will notify service users of the disruption by posting a notice in a conspicuous place on the premises of the service disruption and on the Blue Door website. Blue Door will consider which people with disabilities will be most affected by the disruption and make sure the information is communicated in the most appropriate manner possible. Management will provide the programs with templates to be used when notifying service users about a disruption. (See Appendix A)

**In the event of a service disruption, we will notify the public of the service disruption and alternatives available.**

## **VI. Feedback Process**

Feedback is welcomed and appreciated as it may identify areas that require change and it encourages continuous service improvements. Staff, stakeholders, board members, volunteers, guests, community partners and clients of Blue Door may request a feedback form at any time. This form (See Appendix B) can be submitted to Human Resources and is available electronically or in an alternate format, if requested. Feedback can be provided in person, by telephone, in writing, by e-mail or any other method of communication that is accessible to the person(s). Where possible, feedback will be addressed immediately. Some complaints, suggestions or recommendations may, however, require more effort to address and must be reviewed for action. Feedback will be reviewed and responded to within 14 business days or as soon as reasonably possible. Feedback may not be possible to provide when the issue is related to confidential personnel issues, or if the person providing feedback has not left contact information.

## **VII. Education and Training**

Blue Door will provide training to employees, volunteers and other staff members on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities. Training will be provided in a way that best suits the duties of employees, volunteers and other staff members.

Blue Door will take the following steps to ensure employees are provided with the training needed to meet Ontario's accessible laws by January 1, 2015.

- Training will be provided to each person as soon as possible after they begin with Blue Door. New staff and volunteers will receive training during corporate orientation.
- Ongoing training will be provided in connection with changes to policies, practices and procedures for the provision of services to persons with disabilities.
- The Human Resource Manager will ensure that training is delivered and appropriate records are kept.
- Records will include: the training provided, the dates on which the training was provided, the number of individuals to whom it was provided and the names of those who were trained.

## **VIII. Notice of Availability of Documents**

As required by Ontario Regulation 429/07, Blue Door will prepare one or more documents describing the following and provide them upon request to any person;

- Blue Door policies, practices and procedures about offering of services to people with disabilities.
- Blue Door policies, practices and procedures about the use of service animals and support persons.
- The steps Blue Door will take to notify people about a temporary disruption of facilities or services usually used by people with disabilities.
- Blue Door Policy on providing training on accessible customer service.
- Blue Door process for receiving and responding to feedback on the offering of goods and/or services to people with disabilities.

If Blue Door receives a request for these documents the documents or information will be provided in a format that takes into account, the person's disability.

Notice of how to request documents will be posted in conspicuous place in each program and on the Blue Door website.

Requests for documents related to Ontario Regulation 429/07 Accessibility Standards for Customer Service are to be forwarded to the Human Resource Manager.

## **Employment Standards**

Blue Door is committed to fair and accessible employment practices. We will take the following steps to notify the public and staff that, when requested, will accommodate people with disabilities during the recruitment and assessment processes and when people are hired.

- Include information on our job postings
- Ask during telephone interviews if any accommodation is required
- Prior to an in person interview, the candidate will be asked if they require any type of accommodation

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this procedure addresses:

- I. Recruitment, Assessment and Selection
- II. Accessible Formats and Communication Supports for Employees
- III. Documented Individual Accommodation Plans
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- V. Return to Work and Redeployment

### **I. Recruitment, Assessment and Selection**

Blue Door will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants must be informed that these accommodations are available, upon request, for the interview process and other candidate selection methods. Blue Door must notify the successful applicant of their policies and supports for accommodating people with disabilities.

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

Blue Door S will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities within 7 - 10 business days and at no additional cost to the individual. Blue Door will take into account the person's accessibility needs when customizing individual requests. If an employee with a disability requests it, Blue Door will arrange for the provision of accessible formats and communication supports for the following:

1. Information needed in order to perform their job; and
2. Information that is generally available to all employees in the workplace.

Blue Door should consult with the employee making the request to determine the best way to provide the accessible format or communication support.

### **III. Documented Individual Accommodation Plans**

Blue Door must also develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The process for the development of these

accommodation plans should include specific elements, including:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed on an individual basis;
- The ways an employee can request an evaluation by an outside medical expert, or other experts to determine if accommodation can be achieved, or how it can be achieved;
- The steps taken to protect the privacy of the employee's personal information;
- The frequency with which the individual accommodation plan should be reviewed or updated and how it should be done;
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

#### **IV. Plans and Processes**

Any department within Blue Door that utilizes performance management tools, or provides career development and advancement to their employees, must respect the accessibility needs of their employees with disabilities when developing these processes. Every department within Blue Door will provide a tailored workplace emergency response plan or information for employees with disabilities, if their disability makes it necessary.

#### **V. Return to Work and Redeployment**

Blue Door will develop and have return to work processes in place for employees who are absent from work due to a disability—and require disability-related accommodations in order to return to work. Blue Door will need to document these processes. The return to work process will include an outline of the steps Blue Door will take to facilitate the employee's return to work and use documented individual accommodation plans and will be based on the list of modified duties Blue Door is able to offer.

#### **VI. Posting Requirements**

A note stating, "In case of emergency please contact reception. If you require emergency information or if you require accommodation please let reception know upon arrival and sign in." will be included on the "Visitor's Log In" forms at reception and all program entrances.

#### **Information and Communication**

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this procedure addresses:

- I Accessible Formats and Communication Supports
- II Accessible Websites and Web Content
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- V Exceptions
- VI Feedback



## I. **Accessible Formats and Communication Supports**

Blue Door will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no additional cost to the individual. Blue Door will take into account the person's accessibility needs when customizing individual requests.

## II. **Accessible Websites and Web Content**

All departments governed by Blue Door will make its web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA by the end of 2021. Web content includes any information which resides on an internet or intranet web site.

The *Information and Communications Standard* does not apply to products and product labels; unconvertible information or communications; or information that the organization does not control directly or indirectly through a contractual relationship. If the organization determines that information or communications are unconvertible, the organization should provide the person requesting information or communication with the following:

- a. An explanation as to why the information or communications are unconvertible
- b. A summary of the unconvertible information or communications;
- c. Information is regarded as *unconvertible* if it is not technically feasible to convert the information or communications; or if the technology to convert the information is not readily available.

Blue Door will take the following steps to make all websites and content conform to WCAG 2.0, Level AA by January 1, 2021.

- Ensure that any new or updated websites meet with WCAG 2.0, Level AA

At this point in time Blue Door does not have any unconvertible information.

**For More Information**

For more information on this accessibility plan, please contact at:

Phone: 905 – 898 – 1015

Email: [hr@bluedoor.ca](mailto:hr@bluedoor.ca)

Accessible formats of this document are available free upon request from:

## **Appendix A**

### **Notice Service Disruption**

There will be a scheduled service disruption at:

The disruption will be from \_\_\_\_\_ to \_\_\_\_\_.

These disruptions include:

The following alternative services are available:

On behalf of Blue Door, we would like to thank you for your patience in this matter.

For questions or additional information contact:

Name: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email: \_\_\_\_\_

**Notice  
Service Disruption**

There is currently an unexpected service disruption at:

The estimated time of the service disruption will be from \_\_\_\_\_ to \_\_\_\_\_.

These disruptions include:

The following alternative services are available:

On behalf of Blue Door, we would like to thank you for your patience in this matter.

For questions or additional information contact:

Name: \_\_\_\_\_

Phone: \_\_\_\_\_ Fax: \_\_\_\_\_

Email: \_\_\_\_\_

## Appendix B

### Accessibility Feedback Form

Your feedback is important to us. By answering the following questions, you will help us to better assist you in accessing our services.

Date and time of your visit:

Please circle your answers:

Is our service provided to you in an accessible manner?

Yes

Somewhat

No

If no or somewhat, please explain:

Do you encounter any problems in accessing our services?

Yes

Somewhat

No

If yes, or somewhat, please explain:

Please add any other comments you may have:

Would you like a Society representative to contact you?    No

Yes

If YES, contact information:

Please deposit in the mail box provided or direct you comments to: Human Resources