

Title: AODA - Integrated Accessibility Standards Regulation (IASR) Policy		Approved by: Executive Team
Area: Accessibility for Ontarians with disabilities act (AODA)	Last date of review: April 2024	

## INTENT

This policy is intended to meet the requirements included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act, 2005*.

All services provided by Family and Children's Services of the Waterloo Region shall follow the principles of dignity, independence, integration, and equal opportunity.

## DEFINITIONS

**Assistive device:** Is a technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that Service Users bring with them, such as a wheelchair, walker, or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

**Disability:** The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the Ontario *Human Rights Code*, refers to:

- Any degree of physical disability, 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 co-ordination, blindness or visual impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;
- A condition of mental impairment or a developmental disability;
- A learning disability, or 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*.

**Guide dog:** Is a highly trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety, and increased independence for people who are blind.

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

Exterior Paths of Travel – Refers to sidewalks and walkways designed and constructed for pedestrian travel and intended to provide a functional route from Point A to Point B, rather than a recreational experience.

Redeveloped – A planned significant alteration to a public space. It does not include maintenance activities, environmental mitigation or environmental restoration.

Service animal: An animal is a service animal for a person with a disability if:

1. The animal can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal; or
2. The person provides documentation from a member of one of the following regulated health professional colleges confirming that the person requires the animal for reasons relating to the disability:
  - College of Audiologists and Speech-Language Pathologists of Ontario;
  - College of Chiropractors of Ontario;
  - College of Nurses of Ontario;
  - College of Occupational Therapists of Ontario;
  - College of Optometrists of Ontario;
  - College of Physicians and Surgeons of Ontario;
  - College of Physiotherapists of Ontario;
  - College of Psychologists of Ontario; or
  - College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Support person: A support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

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

Performance Management – Activities related to assessing and improving employee performance, productivity and effectiveness with the goal of facilitating employee success.

Redeployment – 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.

## **GENERAL REQUIREMENTS**

General requirements that apply across all of the standards (information and communication, employment, design of public spaces, and customer service) are outlined as follows.

### Establishment of Accessibility Policies and Plans

Family and Children's Services of the Waterloo Region will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

The Agency will include a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. These documents will be made publicly available in an accessible format, upon request.

The Agency will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR. Accessibility plans will be made available in an accessible format, upon request, and will be posted on our website.

Family and Children's Services of the Waterloo Region will review and update its accessibility plan once every five (5) years and will establish, review and update our accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared that will report on the progress of the steps taken to implement Family and Children's Services of the Waterloo Region's accessibility plan. This status report will be posted on our website. If requested, the report shall be created in an accessible format.

### Procuring or Acquiring Goods and Services, or Facilities

Family and Children's Services of the Waterloo Region will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

### Training Requirements

Family and Children's Services of the Waterloo Region will provide training for (a) all employees, and volunteers; (b) all persons who participate in developing the organization's policies; and (c) all other persons who provide goods, services, or facilities on behalf of the organization as appropriate to their roles and duties with the organization regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will be provided on an ongoing basis to new employees and revised training will be provided in the event of changes to legislation, procedures, policies, or practices.



### Records

Family and Children's Services of the Waterloo Region will maintain records on the training provided, when it was provided and the number of employees that were trained.

### Exceptions

There may be times where it is not possible for Family and Children's Services of the Waterloo Region to meet all technical requirements as outlined within legislation. In these instances, Family and Children's Services of the Waterloo Region will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

### Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

Anne-Marie Simpson, Director of Operations  
519-576-0540 x 3480

**[AnneMarie.Simpson@facswaterloo.org](mailto:AnneMarie.Simpson@facswaterloo.org)**

This policy and its related procedures will be reviewed as required in the event of legislative changes or changes to company procedures.

### Customer Service Guidelines

Family and Children's Services of the Waterloo Region will make every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Ensuring that all service users receive the same value and quality;
- Allowing service users with disabilities to do things in their own ways, at their own pace when accessing goods and services, as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that service users with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual needs when providing goods and services; and
- Communicating in a manner that takes into account the service user's disability.

### **The Use of Assistive Devices**

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Family and Children's Services of the Waterloo Region.

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 the access of goods and services. For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a service user with an oxygen tank may involve ensuring the service user is in a location that would be considered safe for both the service user and business. Or, where elevators are not present and where an individual requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the service user.

### **Guide Dogs and Service Animals**

A service user with a disability who is accompanied by guide dog or service animal will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs or service animals.

### Food Service Areas

A service user with a disability who is accompanied by guide dog or service animal will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are not permitted into food service areas due to the *Health Protection and Promotion Act*, Ontario Regulation 493/17.

### Exclusion Guidelines

If a guide dog or service animal is excluded by law (see applicable laws below), Family and Children's Services of the Waterloo Region will offer alternative methods to enable the person with a disability to access goods and services, when possible (for example, securing the animal in a safe location and offering the guidance of an employee).

### Applicable Laws

*Food Safety and Quality Act, 2001*, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. It also makes an exception for service dogs to allow them in those areas of a meat plant where food is served, sold, or offered for sale to service users and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling, or storing of animals or parts of animals.



*Dog Owners' Liability Act:* If there is a conflict between a provision of this act or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails.

#### Recognizing a Guide Dog or Service Animal:

If it is not readily apparent that the animal is being used by the service users for reasons relating to their disability, Family and Children's Services of the Waterloo Region may request verification from the service user.

#### Care and Control of the Animal:

The service user who is accompanied by a guide dog or service animal is responsible for maintaining care and control of the animal at all times.

#### Allergies

If a health and safety concern presents itself (for example, in the form of a severe allergy to the animal), Family and Children's Services of the Waterloo Region will make all reasonable efforts to meet the needs of all individuals.

#### **The Use of Support Persons**

If a service user with a disability is accompanied by a support person, Family and Children's Services of the Waterloo Region will ensure that both persons may enter the premises together and that the service user is not prevented from having access to the support person.

There may be times where seating and availability prevent the service user and support person from sitting beside each other. In these situations, Family and Children's Services of the Waterloo Region will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the service user before any conversation where confidential information might be discussed.

#### **Notice of Disruptions in Service**

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Family and Children's Services of the Waterloo Region. In the event of any temporary disruptions to facilities or services that service users with disabilities rely on to access or use goods or services of Family and Children's Services of the Waterloo Region, reasonable efforts will be made to provide



advance notice. In some circumstances, such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

If a notification needs to be posted, the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Anticipated duration; and
- A description of alternative services or options.

#### Notification Options

When disruptions occur, Family and Children's Services of the Waterloo Region will provide notice by:

- Posting notices in conspicuous places including at the point of disruption, at the main entrance, and the nearest accessible entrance to the service disruption or on the Family and Children's Services of the Waterloo Region intranet;
- By any other method that may be reasonable under the circumstances.

#### **Service User Feedback**

Family and Children's Services of the Waterloo Region shall provide service user with the opportunity to provide feedback on the service provided to service users with disabilities. Feedback forms, along with alternate methods of providing feedback verbally (in person or by telephone) or written (handwritten, delivered, website, or e-mail), will be available upon request.

#### Submitting Feedback

Service users can submit feedback to:

Anne-Marie Simpson, Director of Operations  
519-576-1329 x 3480  
**[AnneMarie.Simpson@facswaterloo.org](mailto:AnneMarie.Simpson@facswaterloo.org)**

Service users who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Family and Children's Services of the Waterloo Region employee.

Service users who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted.

## **Notice of Availability and Format of Documents**

Family and Children's Services of the Waterloo Region shall notify service users that the documents related to the customer service standards are available upon request and in a format that takes into account the Service user's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Family and Children's Services of the Waterloo Region, the website of Family and Children's Services of the Waterloo Region, and any other reasonable method.

## **DESIGN OF PUBLIC SPACES GUIDELINES**

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Design of Public Spaces Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to removing barriers in two (2) areas:

- Buildings; and
- Public spaces.

### **Outdoor Public Use Eating Areas**

Family and Children's Services of the Waterloo Region is committed to ensuring that any newly constructed and/or redeveloped outdoor public use eating areas have a minimum 20% of tables that are made accessible in accordance with the Integrated Accessibility Standards, section 80.17.

### **Outdoor Play Spaces**

#### Consultation

Prior to constructing or redeveloping an outdoor play space, Family and Children's Services of the Waterloo Region shall consult on the needs of children and caregivers with disabilities with the public and persons with disabilities.

#### Accessibility in Design

Family and Children's Services of the Waterloo Region will ensure that any new or redesigned outdoor play spaces incorporate various accessibility features (e.g. sensory and active play components) into their design and are constructed in accordance with the requirements outlined in the Integrated Accessibility Standards, section 80.20.E. Exterior Paths of Travel.

To ensure the health and safety of all pedestrians, any newly constructed or redeveloped exterior paths of travel will meet, and where possible exceed, the technical requirements of the Integrated Accessibility Standards, section 80.23, and where applicable, sections 80.24 – 80.28.



### Consultation on Rest Areas

Prior to constructing or redeveloping rest areas on exterior paths of travel, Family and Children's Services of the Waterloo Region shall consult on the needs of children and caregivers with disabilities with the public and persons with disabilities Off-Street Accessible Public Parking.

### Types of Spaces and Access Aisles

Family and Children's Services of the Waterloo Region will ensure that any newly constructed or redeveloped off-street parking facilities provide the following two (2) types of parking spaces available for persons with disabilities:

- Type A – Parking space with a minimum width of 3.4 m; and
- Type B – Standard parking space with a minimum width of 2.4 mm.

Access aisles will be provided for all accessible parking spaces and will meet the requirements of the *Integrated Accessibility Standards*, [section 80.35](#).

### Minimums

Family and Children's Services of the Waterloo Region will ensure that any newly constructed or redeveloped off-street parking facility meets, and where possible exceeds, the required number of accessible parking spaces based on the size of the lot. The number of accessible spaces will be aligned with the requirements specified in the *Integrated Accessibility Standards*, [section 80.36](#).

### Signage

Family and Children's Services of the Waterloo Region will ensure that the proper signage is provided for each accessible parking space. Type A parking spaces will have signage indicating van accessibility.

### **Obtaining Services**

#### Service Counters

When constructing or replacing any service counters, Family and Children's Services of the Waterloo Region will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, [section 80.41](#).

#### Waiting Areas



When constructing or redeveloping an existing waiting area, Family and Children's Services of the Waterloo Region will ensure that a minimum of 3% of the seating is made accessible. Family and Children's Services of the Waterloo Region will ensure that there will be at least one (1) accessible seat.

### **Maintenance**

Family and Children's Services of the Waterloo Region shall ensure that our policies addresses:

- Preventive and emergency maintenance procedures for the accessible elements in public spaces; and
- Procedures for temporary disruptions to accessible elements.

### **EMPLOYMENT GUIDELINES**

This policy applies to the provision of accessible employment services for persons with disabilities.

#### **Recruitment, Assessment and Selection**

Family and Children's Services of the Waterloo Region will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, Family and Children's Services of the Waterloo Region will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Family and Children's Services of the Waterloo Region's policies and supports for accommodating people with disabilities.

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

Family and Children's Services of the Waterloo Region will ensure that employees are aware of our policies for employees with disabilities and any changes to these policies as they occur.

If an employee with a disability requests it, Family and Children's Services of the Waterloo Region will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform his/her job; and
- Information that is generally available to all employees in the workplace.

Family and Children's Services of the Waterloo Region will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

### **Workplace Emergency Response Information**

Where required, Family and Children's Services of the Waterloo Region will create individual workplace emergency response information for employees with disabilities. This information will take into account the unique challenges created by the individual's disability and the physical nature of the workplace and will be created in consultation with the employee and will be provided as soon as practicable after the employer becomes aware of the need for accommodation due to the employee's disability. If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to help the employee.

This information will be reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and/or
- Family and Children's Services of the Waterloo Region reviews general emergency response policies.

### **Documented Individual Accommodation Plans**

Family and Children's Services of the Waterloo Region will ensure that our website and all web content published after January 1, 2012, conform to the Web Content Accessibility Guidelines (WCAG) 2.0 and will refer to the schedule set out in the IASR for specific compliance deadlines.

Family and Children's Services of the Waterloo Region 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 that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine if accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent for the creation of the accommodation plan;
- 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 way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and



- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation will also:

- Include information regarding accessible formats and communication supports upon request;
- Where needed, include individualized workplace emergency response information; and
- Outline all other accommodation provided.

### **Performance Management and Career Development and Advancement**

Family and Children's Services of the Waterloo Region will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities.

*Individual accommodation plans will be consulted, as required.*

### **Return to Work**

Family and Children's Services of the Waterloo Region will develop and implement return to work processes for employees who are absent from work due to a disability and require disability-related accommodation(s) in order to return to work.

The return to work process will outline the steps Family and Children's Services of the Waterloo Region will take to facilitate the employee's return to work and shall use documented individual accommodation plans (as described in section 28 of the regulation).

### **Redeployment**

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment.

*Individual accommodation plans will be consulted, as required.*

## **INFORMATION AND COMMUNICATIONS GUIDELINES**

General requirements that apply across all of the five (5) standards (information and communication, employment, transportation, design of public spaces, and customer service) are outlined as follows.

### **Accessible Formats and Communication Supports**



Unless deemed unconvertible, Family and Children's Services of the Waterloo Region 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.

Family and Children's Services of the Waterloo Region 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.

Family and Children's Services of the Waterloo Region will make the availability of accessible formats and communication supports publicly known.

### **Accessible Websites and Web Content**

Family and Children's Services of the Waterloo Region will ensure that our website, and where applicable web content, conforms to the Web Content Accessibility Guidelines (WCAG) as outlined in the IASR, and will refer to the legislation for specific compliance deadlines and requirements.

### **Exceptions**

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 either directly or indirectly through a contractual relationship.

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Family and Children's Services of the Waterloo Region will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Family and Children's Services of the Waterloo Region will classify information or communications as unconvertible where:

- It is not technically practicable to convert; or
- The technology required to make the conversion is not readily available.



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