

Policy Number:	610.3.6
Policy Name:	<b>AODA – Integrated Accessibility Standards Regulation – Information, Communications, and Employment</b>
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Approved By:	President & CEO
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Policy Owner:	Director, Talent Management

## 1.0 Purpose

Pathways to Education Canada is committed to fostering an inclusive workplace that provides an accessible environment for all employees, job applicants, suppliers, and visitors who may enter our premises, access our information, or use our services.

This policy has been established to govern the provision of standards under the Integrated Accessibility Standards Regulation (Regulation 191/11) (IASR) to increase accessibility for persons with disabilities specifically in the areas of:

- Information and Communications
- Employment

This policy is current to the most recent (July 1, 2016) changes to accessibility legislation.

## 2.0 Policy Scope

This policy applies to all employees of Pathways Canada.

## 3.0 Definitions

A list of definitions can be found in Appendix A.

## 4.0 Policy Statement and Guidelines

As an organization, Pathways Canada strives to provide an accessible and welcoming environment for everyone by identifying and removing barriers in our workplace and ensuring that new barriers are not created. The organization respects and complies with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations. Pathways Canada ensures that persons with disabilities are

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provided with equal opportunities. We are committed to meeting the needs of individuals with disabilities in a timely and integrative manner that respects their dignity and independence.

## **GENERAL REQUIREMENTS**

Pathways Canada is committed to improving opportunities for persons with disabilities and implementing strategies that comply with the legislative requirements of the IASR.

Pathways Canada will:

- **Establish Accessibility Policies and Plans**  
Pathways Canada will develop, implement, and maintain policies governing how it will achieve accessibility.
- **Meet Training Requirements**  
Pathways Canada will provide training for its employees and volunteers (Ontario) regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Pathways Canada's policies, and all other persons who work under a contractual agreement directly with Pathways Canada or provide goods, services, or facilities on behalf of the Organization. Training will be provided as soon as it is reasonably practical, but no later than within the first three (3) months of employment and ongoing as changes to Pathways Canada's accessibility policies occur.
- **Review AODA Policies**  
This policy will be reviewed regularly to ensure that it is reflective of Pathways Canada's current practices as well as legislative requirements.

## **REQUIREMENTS FOR INFORMATION AND COMMUNICATION STANDARDS**

Pathways Canada is committed to ensuring that all the applicable information and communication requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 (IASR) are met. They include the following:

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

Upon request and consultation, Pathways Canada will endeavor to provide or arrange for the provision of accessible formats and communication supports for persons with disabilities under the Organization's control. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

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Pathways Canada will consider the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Pathways Canada will make the availability of accessible formats and communication supports publicly known.

## **Feedback Processes**

Pathways Canada will ensure that all feedback processes (internal and external) are made available to clients/customers and employees upon request. In accordance with customer service standards, Pathways Canada will make known the availability of accessible feedback formats.

## **REQUIREMENTS FOR EMPLOYMENT STANDARDS**

All employment requirements related to the following will be in accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11 (IRASR):

- Recruitment, Assessment and Selection
- Accessible Formats and Communication Supports for Employees
- Workplace Emergency Response Information
- Performance Management and Career Development and Advancement
- Redeployment

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

Pathways Canada will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

Pathways Canada will ensure that job applicants are notified when they are individually selected to participate in the assessment or selection process and that accommodations for disabilities are made available upon request in relation to the materials or processes to be used.

Pathways Canada will consult with individuals who request accommodations and will provide for appropriate accommodations.

When presenting offers of employment, Pathways Canada will notify the successful applicant of its policies for accommodating employees with disabilities.

## **Informing Employees of Supports**

Pathways Canada will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including

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policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practical after commencing employment.

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

Upon request of an employee with a disability, Pathways Canada will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform their job, and information that is generally available to other employees.

## **Workplace Emergency Response Information**

Where required, Pathways Canada will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and if Pathways Canada is aware of the need for accommodation due to the employee's disability.

The individualized workplace emergency response 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
- Pathways Canada reviews general emergency response policies.

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

Pathways Canada 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.

## **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.

## **Questions**

This policy has been developed to break down barriers and increase accessibility for persons with disabilities related to employment at Pathways Canada. Questions about the policy, or if further information is needed to understand the policy, explanations will be provided by the Human Resources Department.

## **5.0 Procedures and Responsibilities**

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The Director, Talent Management will be responsible for ensuring adherence to the policy requirements outlined in Section 4 and will monitor compliance of this policy and update the CEO and the HR & Compensation Committee on an annual basis.

## **6.0 Related Policies and Legislation**

Pathways AODA – Customer Service Policy

Pathways Hiring Policy

Pathways Human Rights Policy

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Ontario Human Rights Code

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

Ontario Regulation 191/11, Integrated Accessibility Standards Regulations (IRASR)

Employment Standards Act

## **7.0 Supporting Information Exhibits / Appendices / Forms**

## Appendix A: 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 customers bring with them such as a wheelchair, walker or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering and/or reading.

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

Barrier – any obstacle, including anything physical, architectural, technological or attitudinal, based on information, communications or result of a policy or a practice that hinders the full and equal participation in society of persons with a disability, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

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.

Conversion Ready – An electronic or digital format that facilitates conversion into an acceptable format.

Customer – Those to whom Pathways provides a service which includes current and prospective donors, community partners, members of the public inquiring about Pathways, Pathways alumni, and job applicants.

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

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- 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.

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.

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 one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
  - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
  - A member of the College of Chiropractors of Ontario;
  - A member of the College of Nurses of Ontario;
  - A member of the College of Occupational Therapists of Ontario;
  - A member of the College of Optometrists of Ontario;
  - A member of the College of Physicians and Surgeons of Ontario;
  - A member of the College of Physiotherapists of Ontario;
  - A member of the College of Psychologists of Ontario; or
  - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

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Services – The activities that Pathways undertakes that are related directly to its core mission, or, indirectly to serving its various customers or stakeholders. Services related to core mission include, but are not limited to: providing funding and support to community partners, working with current and prospective donors to secure funding, working with other community or government stakeholders to further Pathways' work. Services related to other customers or stakeholders include but are not limited to: providing information through various communication including phone, digital media, advertising, printed material or in-person.

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.