

# Good Beginnings' Accessibility Policies

## AODA – Integrated Accessibility Standards Regulation (IASR) Employment Policy

### Intent

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Employment Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of accessible employment services for persons with disabilities.

All employment services provided by Good Beginnings shall follow the principles of dignity, independence, integration and equal opportunity.

### Definitions

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

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 Principles

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

### General Requirements

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.

### Establishment of Accessibility Policies and Plans

Good Beginnings will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

Good Beginnings 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.

Good Beginnings will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barrier and meets its requirements under the IASR. Accessibility plans will be made available in an accessible format upon request and will be posted on our website. This plan will be reviewed at minimum once every five years to assess progress and accuracy,

### Training Requirements

Good Beginnings will provide training for its employees and volunteers 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 Good Beginnings' policies, and all other persons who provide goods, services or facilities on behalf of Good Beginnings.

Training will be provided as soon as is reasonably practicable, but no later than the compliance deadline. Training will be provided on an ongoing basis to new employees and as changes to Good Beginnings' accessibility policies occur.

### Records

Good Beginnings will maintain records on the training provided, when it was provided and the number of employees who were trained.

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

Good Beginnings 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, Good Beginnings will consult with the applicant and provide or arrange for suitable accommodation.

Successful applicants will be made aware of Good Beginnings' policies and supports for accommodating people with disabilities.

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

Good Beginnings 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, Good Beginnings will provide or arrange for the provision of accessible formats and communication supports for the following:

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

Good Beginnings 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, Good Beginnings 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.

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
- Good Beginnings reviews general emergency response policies.

**Documented Individual Accommodation Plans**

Good Beginnings will develop and have in place written processes for documenting individual accommodations plans for employees with disabilities.

**Return to Work**

Good Beginnings will develop and implement return-to-work processes for employees who are absent from work due to a disability and require disability-related accommodations in order to return to work. The return-to work process outlines the steps Good Beginnings will take to facilitate the employees return to work and will use documented individual accommodation plans as outlined by the regulation.

**Performance Management and Career Development and Advancement**

Good Beginnings 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.*

**Review**

This policy will be reviewed regularly to ensure that it is reflective of Good Beginnings' current practices as well as legislative requirements.

# AODA – Integrated Accessibility Standards Regulation (IASR) Information and Communications Policy

## **Intent**

This policy is intended to meet the requirements of the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) for the Information and Communications Standard set forth under the [Accessibility for Ontarians with Disabilities Act, 2005](#). This policy applies to the provision of information and communications services and materials for people with disabilities.

All information and communications materials and services provided by Good Beginnings shall follow the principles of dignity, independence, integration and equal opportunity.

## **Definitions**

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

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.

## **General Requirements**

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.

### Establishment of Accessibility Policies and Plans

Good Beginnings will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

### Training Requirements

Good Beginnings will provide training for its employees and volunteers 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 Good Beginnings' policies, and all other persons who provide goods, services or facilities on behalf of Good Beginnings.

Training will be provided as soon as is reasonably practicable, but no later than the compliance deadline. Training will be provided on an ongoing basis to new employees and as changes to Good Beginnings' accessibility policies occur.

## **Feedback Process**

Good Beginnings will ensure that all feedback processes, both internal and external are made accessible to clients, customers and employees upon request.

In accordance with the customer service standards, Good Beginnings will make known the availability of accessible feedback formats.

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

Unless deemed unconvertible, Good Beginnings 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. Good Beginnings 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.

Good Beginnings will make the availability of accessible formats and communication supports publicly known.

### **Emergency Procedures, Plans or Public Safety Information**

Good Beginnings will ensure that all publicly available safety and emergency information, such as evacuation procedures and floor plans, are provided in an accessible format or with appropriate communication supports upon request.

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

Good Beginnings will ensure that our website and web content conform to the Web Content Accessibility Guidelines 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.

### Unconvertible Information or Communications

If it is determined, in consultation with the requesting party, that information or communications are unconvertible, Good Beginnings will ensure that the individual who made the request is provided with an explanation and a summary of the information.

Good Beginnings 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.

### **Review**

This policy will be reviewed regularly to ensure that it is reflective of Good Beginnings' current practices and legislative requirements.

# AODA – Integrated Accessibility Standards Regulation (IASR) Customer Service Standards Policy

## Intent

All goods and services provided by Good Beginnings will follow the principles of dignity, independence, integration, and equal opportunity.

This policy meets the requirements of the customer service standards included in the *Integrated Accessibility Standards Regulation* under the *Accessibility for Ontarians with Disabilities Act, 2005*. It applies to the provision of goods and services to the public or other third parties, not to the goods themselves.

## Definitions

Assistive device: 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, and that might assist in hearing, seeing, communicating, moving, breathing, remembering, or reading.

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: 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.

Service animal: 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:** In relation to a person with a disability, another person who accompanies them in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

## **Guidelines**

### **The Provision of Goods and Services to Persons with Disabilities**

Good Beginnings 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 customers receive the same value and quality;
- Allowing customers 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 health and safety risk;
- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner;
- Taking into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that takes into account the customer's disability.

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

#### Customer's Own Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by the company.

In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services, up to the point of undue hardship.

For example, open flames and oxygen tanks cannot be near one another. Therefore, the accommodation of a customer with an oxygen tank might involve ensuring the customer is in a location that would be considered safe for both the customer and business.

Alternatively, where elevators are not present and where a customer requires assistive devices for the purposes of mobility, service will be provided in a location that meets the needs of the customer.

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

A customer with a disability who is accompanied by a 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.

Staff may respectfully ask if an animal is a service animal and will not ask the nature of the person's disability or purpose of the animal.

### Exclusion Guidelines

If a customer's guide dog or service animal is excluded by law, Good Beginnings will offer alternative methods to enable the person with a disability to access goods and services, when possible. For example, the company might accommodate a customer's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

### Care and Control of the Animal:

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

### Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Good Beginnings will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises. As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

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

If a customer with a disability is accompanied by a support person, Good Beginnings will ensure that both persons may enter the premises together and that the customer is not prevented from having access to the support person.

There may be times where seating and availability prevent the customer and support person from sitting beside each other. In these situations, the company will make every reasonable attempt to resolve the issue.

In situations where confidential information might be discussed, consent will be obtained from the customer before any potentially confidential information is mentioned.

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

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Good Beginnings. In the event of any temporary disruptions to facilities or services that customers with



disabilities rely on to access or use goods or services, 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, Good Beginnings 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 company website;
- Contacting customers with appointments;
- Verbally notifying customers when they make a reservation or appointment; or
- By any other method that may be reasonable under the circumstances.

### **Customer Feedback**

Good Beginnings shall provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available. 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

Customers can submit feedback to the Supervisor or online on our website. Customers who wish to provide feedback by completing an onsite customer feedback form or verbally can do so to any Good Beginnings employee.

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

### **Training**

Training will be provided to:

- Every employee of or a volunteer with Good Beginnings;
- Every person who participates in developing the policies of Good Beginnings; and
- Every other person who provides goods, services, or facilities on behalf of Good Beginnings.

### Training Provisions

Regardless of the format, training will cover the following:

- A review of the purpose of the *Accessibility for Ontarians with Disabilities Act, 2005*;
- A review of the requirements of the customer service standards;
- Instructions on how to interact and communicate with people with various types of disabilities;
- Instructions on how to interact with people with disabilities who:

- Use assistive devices;
- Require the assistance of a guide dog or other service animal; or
- Require the use of a support person (including the handling of admission fees);
- Instructions on how to use equipment or devices that are available at our premises or that we provide that may help people with disabilities;
- Instructions on what to do if a person with a disability is having difficulty accessing our services; and
- Policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.

#### Training Schedule

Good Beginnings will provide training as soon as practicable. Training will be provided to new employees and volunteers, during the onboarding process. Training will be provided in the event of changes to legislation, procedures, policies, or practices.

#### Record of Training

Good Beginnings will keep a record of training that includes the dates training was provided and the number of employees who attended the training.

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

Good Beginnings shall notify customers that the documents related to the customer service standards are available upon request and in a format that takes into account the customer's disability. Notification will be given by posting the information in a conspicuous place owned and operated by Good Beginnings, the website of Good Beginnings, and any other reasonable method.

#### **Administration**

If you have any questions or concerns about this policy or its related procedures, please notify your Supervisor or Human Resources.

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

# AODA – Integrated Accessibility Standards Regulation (IASR) Design of Public Spaces Policy

## **Intent**

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.

## **Definitions**

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

Environmental Mitigation – Activities that are intended to address any negative effects on the environment caused by the standard.

Environmental Restoration – Activities that will benefit the environment.

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.

## **General Requirements**

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.

### Establishment of Accessibility Policies and Plans

Good Beginnings will develop, implement and maintain policies governing how it will achieve accessibility through these requirements.

### Training Requirements

Good Beginnings will provide training for its employees and volunteers 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 Good Beginnings' policies, and all other persons who provide goods, services or facilities on behalf of Good Beginnings.

Training will be provided as soon as is reasonably practicable, but no later than the compliance deadline. Training will be provided on an ongoing basis to new employees and as changes to Good Beginnings' accessibility policies occur.

## **Off-Street Accessible Public Parking**

### Types of Spaces and Access Aisles

Good Beginnings 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

Good Beginnings 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

When in our control, Good Beginnings 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, Good Beginnings will ensure that at least one (1) counter is made accessible in accordance with the *Integrated Accessibility Standards*, section 80.41.

##### Fixed Queuing Guides

When constructing new fixed queuing guides, Good Beginnings will ensure that they are made accessible to people with various disabilities in accordance with the *Integrated Accessibility Standards*, section 80.42.

##### Waiting Areas

When constructing or redeveloping an existing waiting area, Good Beginnings will ensure that a minimum of 3% of the seating is made accessible. Good Beginnings will ensure that there will be at least one (1) accessible seat.

#### **Exceptions**

There may be times where it is not possible for Good Beginnings to meet all technical requirements as outlined within legislation. In these instances, Good Beginnings will strive to meet the requirements to the fullest extent to allow for accessible use with particular constraints as addressed in legislation.

#### **Review**

This policy will be reviewed regularly to ensure that it is reflective of Good Beginnings' current practices as well as legislative requirements.