



Accessibility policy

Purpose:

This policy defines the vision and goals of the Institute for Work & Health (IWH) related to accessibility and expectations to ensure compliance with the *Accessibility for Ontarians with Disability Act, 2005* (the AODA), its standards and regulations, and other applicable legislation and IWH policies. The overall goal is to increase accessibility for persons with disabilities in a way that supports their full and equitable participation in the workplace.

This document is publicly available. Accessible formats are available upon request.

Application:

This policy applies to all employees, trainees, board members, contractors, consultants and visitors.

Policy statement:

Persons living with disabilities represent a heterogeneous group who may experience diverse barriers to inclusion. IWH is committed to ensuring equitable participation for persons living with disabilities. IWH believes in the benefits of inclusivity and is committed to addressing barriers to inclusivity in a timely manner. IWH will do so by identifying, removing and preventing barriers to accessibility and by meeting the accessibility requirements under Ontario's accessibility laws.

IWH will demonstrate our commitment to accessibility by ensuring that supports and services provided to persons with disabilities:

1. Are free from discrimination.
2. Are provided in a manner that respects their dignity and independence.
3. Are integrated as fully as possible into existing support and service delivery procedures so that persons with disabilities can benefit from the same support as other people, delivered in a similar way.
4. Take individual needs of persons with disabilities into account to ensure that there are no barriers to access, skills development, or participation, and that persons with disabilities are treated equitably.

IWH is dedicated to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination. IWH understands that obligations under the AODA and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to persons with disabilities under any other law.

This policy and the associated IWH Accessibility Plan aim to ensure that IWH meets or exceeds the standards set by the AODA and the *Integrated Accessibility Standards Regulation (IASR)*.

Policy # 5.15
Issued: 2011
Approved by: Executive Committee
Responsible: Executive Committee
Reviewed: annually

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Definitions:

Assistive Technology: Includes tools, devices, equipment and technology that helps persons with disabilities in carrying out tasks and activities. Assistive technologies can be aimed at mobility, cognition, communication, hearing, vision, environmental controls, air quality, navigation and other areas that may challenge independence. Examples of assistive technologies include, but are not limited to, wheelchairs, grasping equipment, canes, speech to text and text to speech devices, screen enlargement, hearing aids, voice recognition, equipment that helps with breathing, GPS, and cameras.

Barrier to inclusion: Any factor in the environment that prevents or limits a person with a disability from fully participating in a role or other aspect of society. Barriers can be physical, informational, communicational, attitudinal, or technological.

Disability: The World Health Organization recognizes three dimensions to disability: impairments of body or mind, activity limitations, and participation restrictions in broad roles and societal engagement. A disability arises when there is a limitation in performing an activity that is the result of an interaction between a health condition (impairment) and personal and environmental barriers, including negative attitudes, activity demands, public policies and practices, inaccessible physical environments, and limited social support. Disabilities can be visible as well as non-visible; episodic, constant, temporary, or progressive; and of differing severity (WHO, International Classification of Functioning, Disability and Health (ICF), Geneva: 2001, WHO).

Service Animals: A service animal – most often a dog – has special training to help a person with a disability perform specific tasks and activities. For example, service animals may accompany people with vision, hearing, cognitive, or seizure-related disabilities. Service animals differ from emotional support animals that provide comfort and security. Because emotional support animals typically do not have training for specific tasks, they do not qualify as service animals under the AODA

Support Person: A support person is an individual hired or chosen by a person with a disability to provide services or assistance with communication, mobility, personal care, medical needs or with access to goods and services. The support person could be a paid personal support worker, a volunteer, a friend or a family member. They may have special training or qualifications, but not always.

Roles and responsibilities

Executive Committee is responsible for:

- Ensuring that all members of IWH are treated equitably and with dignity and respect.
- Fostering and striving to create a positive work environment through proactive measures, barrier-free systems analysis, enforcement, and ensuring that no new barriers to accessibility are unintentionally created.

Director, HR & Corporate Services is responsible for:

- Providing accommodations in accordance with Duty to Accommodate and Duty to Inquire human rights legislation.
- Providing support and accommodations upon request after consulting with the individual and making suitable arrangements for accommodation.
- Ensuring that all members of IWH are aware of their rights and responsibilities under this policy and take disciplinary action when breaches of this policy occur.

- Providing training aimed at supporting the goals of AODA.

All employees are responsible for:

- Ensuring they understand the intent of this policy.
- Complying with the provisions of this policy.
- Completing required training as directed by the Director, HR & Corporate Services.

Procedure:

Training

1. All employees covered by this policy will be required to complete training on the purpose and requirements of the AODA, IASR and IWH policies, practices and procedures related to interacting and communicating with persons with various types of disabilities.
2. Training will be provided to each person as soon as reasonably practicable using appropriate methodologies and according to their duties. Ongoing training shall be provided in connection with changes to IWH policies, practices and procedures on accessibility.
3. IWH will maintain a record of the dates on which the training is provided and the individuals to whom it is provided.

Assistive technology

4. IWH will work with employees with disabilities to support their use of personal assistive technology while on IWH premises to manage a disability. In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can complete the requirements of their job and access IWH facilities.

Communication

5. IWH will communicate with persons with disabilities in ways that consider their disability and will work with the person with disabilities to determine what method of communication works for them to help them meet their job demands.

Service animals

6. Persons with disabilities entering IWH offices may be accompanied by their Service Animal. IWH will strive to make all reasonable accommodations to support the use of Service Animals.
7. The owner of the Service Animal is responsible for its care and supervision. IWH does not accept liability for any Service Animal's care or well-being while its owner is accessing IWH or performing their work duties.
8. In the event that there is an allergy to animals by other employees, alternative arrangements will be negotiated.

Support persons

9. Employees with disabilities who are accompanied by a support person have the right to access their support person while at IWH. Some limitations to this policy may arise related to sharing private or confidential information. In these instances, alternative arrangements will be negotiated.

Notice of temporary disruption

10. Notice will be provided of planned disruption to the services or facilities within IWH in a manner that considers the needs of employees with disabilities. Individual emergency response information will be provided to employees with disabilities to help plan for unexpected disruptions.

Feedback process

11. Persons with disabilities will have the option of providing feedback on the degree to which their accessibility needs were met by IWH. IWH will aim to resolve any accessibility deficiencies noted by this feedback process. All feedback can be directed to the Director, HR & Corporate Services. Feedback will remain confidential and the Director, HR & Corporate Services will respond to the feedback if necessary. Opportunities will also be given to provide anonymous input and feedback.

Procurement

12. IWH will incorporate accessibility criteria and features when procuring or acquiring goods, services and facilities, where practical and permitted to do so. Upon request, IWH will provide an explanation where it is not practicable to incorporate accessibility criteria and features when procuring or acquiring goods, service or facilities.

Information and communications

13. IWH is committed to providing information in an accessible format upon request. To request an alternate format or communication support, individuals should contact the Communications Manager. For more information about data accessibility, please see *Policy 5.1 - Privacy*.
14. The Communications Manager will work in consultation with the person with a disability to arrange for accessible formats and communications supports that meet their individual accessibility needs.
15. IWH shall notify the public about the availability of accessible formats and communication supports through its website and shall engage in an ongoing process of identifying additional accessible formats and communications supports that may be offered by IWH.
16. All IWH websites, web content and web-based applications will conform to the Web Content Accessibility Guidelines (WCAG) as outlined in *IWH plan for complying with communications-related requirements under Ontario's Accessibility for Ontarians with Disabilities Act*.

Employment

17. As part of IWH recruitment procedures, all job postings will include a statement regarding the availability of accommodation for applicants with disabilities. See *Policy 1.1 – Hiring new employee*.
18. Upon request by an employee with a disability, IWH shall provide, or arrange for, accessible formats and communication supports for information that is needed to perform their job, and information that is available to other employees.
19. Where IWH is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as possible if such information is necessary given the nature of the employee's disability.

20. IWH will follow its operational processes for developing documented individual accommodation plans for employees with disabilities. If requested, the accommodation plan will include information regarding accessible format and communication supports provided, individualized emergency response information, if required, and any other accommodation that is to be provided.

Design of public spaces

21. To the extent possible, IWH shall ensure that the design and layout of its premises are accessible to persons with disabilities. When planning new office space or renovations to existing space, within its control, IWH shall ensure accessibility requirements set out in the IASR and Ontario's Building Code are incorporated into the planning, design, and construction phases.

Related documents:

- Policy 1.1 – Hiring a new employee
- Policy 2.1 – Flexible work arrangements
- IWH Accessibility Plan
- Process for developing individual accommodation plans [under development]
- IWH plan for complying with communications-related requirements under Ontario's Accessibility for Ontarians with Disabilities Act
- Providing Accessible Emergency Information to Staff checklist
- Policy 5.1 - Privacy

Related legislation:

- Ontario Human Rights Code, s5(1)
- Accessibility for Ontarians with Disabilities Act
- Ontario Regulation 191/11, Integrated Accessibility Standards
- Web Content Accessibility Guidelines (WCAG)