Policy Name:	Program/Department:	Issue Date: *(month, year)*
Accessibility Policy	People & Culture	December 2023

1. Introduction/Objective:

March of Dimes Canada's (MODC) Accessibility Policy establishes our framework for compliance with the requirements of the Accessibility for Ontarians with Disabilities Act, (AODA) and Accessibility for Manitobans Act (AMA). This framework will apply in all provinces that MODC operates in.

2. Policy Statement:

MODC's vision of an accessible, barrier-free, inclusive society is detailed in our Strategic Plan. Consistent with MODC's Purpose, Vision, Mission and Values, accessibility will be embedded into all our employment and service activities to ensure people living with disabilities can fully participate in our programs, services, facilities, information, communications and employment, without barriers.

All MODC policies, procedures, and practices will comply with the AODA, AMA, and any forthcoming provincial accessibility legislation.

In alignment with provincial accessibility legislation, MODC will:

- Identify, prevent and remove barriers that limit people living with disabilities from accessing MODC programs, services, facilities and employment;
- Where we are unable to build in accessibility up front, we will accommodate the needs of people living with disabilities to ensure they can obtain, use or benefit from MODC programs, services, facilities and employment, and that they can do so in a timely manner, at a cost no greater than the cost for people without disabilities; and
- Develop and train our people on providing accessible programs, services, facilities and employment.

MODC's programs, services, facilities and employment will be designed and delivered in compliance with and beyond the AODA and AMA general requirements and the following standards:

- General Requirements
- Information and Communication
- Customer Service
- Employment
- Built Environment and Public Spaces

2.1 Scope

This Policy applies to all MODC people including employees, volunteers, students and contractors.

Any individual or third-party organization that provides programs, services, and facilities on behalf of MODC is required to demonstrate compliance with this policy, the AODA and/or AMA.

2.2 Principles

MODC programs, services, facilities and employment will be available to people with disabilities in a manner that:

- Is free from discrimination and fosters inclusion;
- Strives at all times to respect the individual's dignity and independence; and
- Takes individual accessibility needs into account to ensure that there are no barriers to access or participation

Failure to comply with AODA and/or AMA may result in significant fines and reputational damage. Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

3. Definitions:

Accessibility
A concept integral to human rights that refers to the absence of barriers that prevent individuals and/or groups from fully participating in all social, economic, political and cultural aspects of society. The term is often linked to people with disabilities and their rights to access, and also refers to design characteristics of products, devices, information, services, facilities or public spaces that enable independent use, or support when required, and access by people with a variety of disabilities.

Accessible
Refers to products, devices, information, services, facilities or public spaces that provide for independent, equitable and dignified access for people with disabilities, including but not limited to those with visual, auditory, sensory, cognitive and mobility related disabilities. The concept of accessible design ensures both "direct access" (i.e., unassisted) and "indirect access," referring to compatibility with a person's assistive technology.

Accessible Formats
Refers to formats that are usable by persons with disabilities including but not limited to: large print, recorded audio and electronic formats, and Braille.

Accommodation
In the context of Human Rights legislation, accommodation means preventing and removing barriers caused by attitudinal, systemic, physical, information or communications, and technology barriers that unfairly exclude individuals or groups protected by Human Rights Codes from having equal access to full benefits available to others. Principles of accommodation include dignity, individualization and inclusion or integration. Refer to MODC's Employment Accommodation Policy.

Assistive Devices
Refers to technical aids, communication devices, or medical aids modified or customized for use to increase, maintain or improve the functional ability of a person with a disability including but not limited to wheelchairs, walkers, white canes, note taking devices, portable magnifiers, recording machines, assistive listening devices, personal oxygen tanks and devices for grasping. Assistive devices may accompany the customer or already be on the premises for the purpose of assisting persons with disabilities in carrying out activities or in accessing the services provided by MODC.

Barrier
Anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.

Career Development and Advancement
The provision of additional responsibility within an employee's current position or movement from one job to another within the organization that may be higher in pay, provide greater responsibility, or be at a higher level in the organization.

Communications
Refers to interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received.

Communications Supports
Includes, but is not limited to, captioning, alternative and augmentative communications supports, plain language, sign language and other supports that facilitate effective communications.

Conversion Ready
An electronic or digital format that facilitates conversion into an accessible format such as Braille, large print, audio cassettes CDs DVDs, etc.

Disability
defined, per Section 2 of the *Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11* as follows:

(a) 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,

(b) a condition of mental impairment or a developmental disability,

(c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language,

(d) a mental disorder, or

(e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

It is important to note that MODC promotes the social model of disability which focuses on how society and its attitudes, structures, and systems create barriers for people with impairments. The model seeks embed accessible design into all aspects of society.

Goods, Services and Facilities
All aspects of MODC as an employer and service provider, including: delivery of goods, services, and programs, all information and communication including verbal, print, audio, video, websites, web applications and web content, and other digital technologies and all buildings, facilities, public spaces.

Information
Includes but is not limited to data, facts and knowledge that exists in any format, including text, audio, digital, or images that convey meaning.

New Internet Website
Refers to either a website with a new domain name or a website with an existing domain name undergoing a significant refresh.

Performance Management
A program that defines and assesses employee performance, productivity and effectiveness, with the goal of facilitating employee success.

Practicable
Capable of being done or put into practice; capable of being used. Factors relevant to determining if accessibility is practicable may include:

- Availability of accessible services, goods including commercial software or tools, or facilities
- Technological compatibility between older products and newer ones being procured.

Public Spaces
Refers to outdoor recreational trails, beach access routes, boardwalks, ramps, outdoor public use eating areas, outdoor play spaces, outdoor paths of travel, accessible parking and service counters.

Redeployment
Assigning an employee to another job or department within the organization as an alternative to layoff, when a particular job or department within the organization has been downsized or eliminated.

Service Animals
An animal is a service animal for a person with a disability if 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 the person provides documentation from a regulated health professional* confirming that the person requires the animal for reasons relating to the disability.

Support Person
An individual who accompanies a person with a disability to help with communication, mobility, personal care or medical needs or with access to goods or services.

Unconvertible
Information or communications are unconvertible if it is not technically feasible to convert the information and communication, or the technology to convert the information and communication is not readily available.

4. Roles and Responsibilities:

Accessibility is a shared responsibility, and all our people have a role to play.

4.1 Our People - Employees, Volunteers, Students, Contractors and Third Parties

Our people and other persons acting on behalf of MODC will:

- Have thorough knowledge of and maintain compliance with this Policy;
- Provide a welcoming, inclusive environment for people living with disabilities;
- Include accessibility considerations in the development of programs, services, facilities and employment activities;
- Actively participate in identifying accessibility barriers and in plans for barrier removal;
- Provide information, communications and feedback processes in accessible formats upon request, or with communication supports, consulting with the requestor about their preferred format;
- Take appropriate action regarding feedback about the manner that MODC provides programs, services, facilities and employment to persons with disabilities; and
- Complete mandatory training on the AODA, AMA, Respectful and Inclusive Workplace, and other role specific accessibility trainings, as required.

4.2 Supervisors, Managers and Directors

In addition to the roles and responsibilities in Section 4.1 of this Policy, people leaders will:

- Provide leadership in building an inclusive and accessible environment for our service users and our people;
- Ensure that this Policy is communicated to our people and those acting on behalf of MODC;
- Monitor current practices and ensure that our people are held accountable for their responsibilities under this Policy;
- Act on non-compliant issues within their area of responsibility;
- Facilitate requests for accommodation by our service users and in accordance with our Employment Accommodation Policy, for our people; and
- Ensure volunteers and third parties providing programs, services, and facilities on behalf of MODC have been provided AODA training, either by MODC or their own organization.

4.3 Executive Leadership

In addition to roles and responsibilities in Sections 4.1 and 4.2 of this Policy, MODC executive leadership will:

- Ensure appropriate resources for identifying and preventing accessibility barriers and for actions regarding barrier removal; and
- Provide oversight for implementation of this Policy and compliance with Accessibility legislation within area of responsibility.

The President and CEO is responsible for reporting compliance to the Province of Ontario, in accordance with AODA reporting deadlines, with support from the Chief People Officer.

5. Procedures

5.1 General Requirements

MODC will ensure the general requirements of the AMA and Integrated Accessibility Standards Regulation (IASR) under the AODA, noted below are met and/or exceeded in order to advance accessibility for persons with disabilities.

5.2 Accessibility Policies

MODC will maintain policies governing how we will achieve the requirements of the AMA and IASR under the AODA. MODC will make such documents available to service users in accessible formats upon request. See MODC's list of service user and employee Accessibility Policies at the end of this document.

5.3 Multi-Year Accessibility Plan

MODC will update its Multi-Year Accessibility Plan outlining our strategy to identify, remove, prevent barriers to meet the legislated requirements of the IASR. The plan is posted on MODC's website and can be made available in an accessible format and/or with appropriate communications supports in a timely manner, upon request. See MODC's Multi-Year Accessibility Plan.

5.4 Training

MODC requires our people including employees, volunteers, students and persons who participate in developing MODC policies or who provide programs, services or facilities on behalf of MODC to complete training on the AODA, AMA, relevant Human Rights Code provisions and Accessible Customer Service obligations. Training will take place as soon as is practicable after starting at MODC and be appropriate to the person's duties. MODC maintains training records, including the dates on which accessibility training took place and the names of individuals trained. MODC also provides training on an ongoing basis in respect of any changes to this policy and/or related policies/practices. Employees can access MODC's employee Learning and Development intranet page to access a range of mandatory and discretionary equity related and other offerings.

6. Information and Communication Requirements

MODC will provide accessible information and communication by preventing and removing barriers, and providing accessible formats or communication supports to individuals who identify a barrier to accessibility.

6.1 Accessible Formats and Communication Supports

All information and communications that MODC produces, directly or indirectly, will be made available in alternate formats with communications supports upon request. Service users can request an accessible format by emailing policy@marchofdimes.ca. Employees can speak to their leader or utilize the process in our Employment Accommodation Policy and supporting resources.

When an accessible format or communication support is requested, MODC will consult with the person making the request to determine which format or support is needed and make arrangements to provide the material in a reasonable amount of time and at no additional cost to the requestor.

If, after consulting with Executive Leadership, the information or communication is determined to be unconvertible, MODC will provide the person requesting the information or communication with:

- An explanation as to why the information or communications are unconvertible; and
- A summary of the unconvertible information or communications.

6.2 Notice of Availability of Documents

MODC communicates the availability of our public documents via our Accessible Customer Service Policy – which can be provided, upon request, in the appropriate format or with communication supports. Individuals can request a public document by contacting us.

6.3 Accessible Websites and Web Content

MODC's internet website and web content, controlled directly by MODC or through a contractual relationship that allows for modification, will conform and/or go beyond the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA, in accordance with the timelines set out in the IASR and in the Accessible Information, Communications, and Technology Guidelines.

6.4 Emergency Procedures, Plans or Public Safety Information

MODC emergency procedures, plans or public safety information is addressed in MODC's Business Continuity Plans and can be made available in an accessible format or with appropriate communication supports as soon as possible, upon request.

6.5 Feedback

MODC maintains a process for receiving and responding to feedback, including feedback on how services are delivered to people with disabilities. MODC will make feedback processes accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communication supports upon request. See our complaints/feedback process.

7. Customer Service Requirements

MODC's Mission is to be Canada's leading service provider, resource and advocate, empowering people living with disabilities to live and thrive in communities nationwide. We are committed to advancing accessibility in compliance with and beyond the AODA, AMA with a goal of advancing inclusion for our service users. See our Accessible Customer Service Policy.

7.1 Fees

Persons with disabilities will not be charged more to access MODC programs, services and/or facilities. Where a fee is charged for accessing a MODC program, service, facility, MODC will not charge a support person accompanying a person with a disability a fee. Where MODC requires a support person to accompany an individual for health and safety reasons, any applicable fees will be waived for the support person.

7.2 Assistive Devices

MODC permits persons with disabilities to use their own assistive devices to obtain, use or benefit from the programs, services, facilities and employment offered by MODC. In circumstances where a person with a disability is unable to access MODC's services through the use of their own personal assistive device, MODC will assess service delivery and potential service options to meet the needs of the individual, in accordance with the relevant human rights code.

Where MODC owned assistive devices are available, they will be kept in good working order and the public will be informed of their availability. Staff within the applicable department will be trained in the application and use of the devices.

7.3 Support Persons

Where a person with a disability accessing MODC programs, services, or facilities is accompanied by a support person, MODC will ensure that both persons are permitted to enter the premises together and the person with a disability is not prevented from having access to the support person while on the premises.

MODC may require a support person to accompany a person with a disability for reasons of health and safety – either for the person with a disability or others on the premises. This will only occur after consulting with the person if it is determined that based on the person's needs and available evidence:

1. A support person is necessary to protect the health and safety of the person with a disability or the health and safety of others on the premises, and

2. There is no reasonable way to protect the health or safety of the person with a disability or the health and safety of others on the premises.

Any considerations related to protecting health and safety must be based on specific evidence and not on assumptions. If MODC requires a support person to accompany an individual for health and safety reasons, any applicable fees will be waived for the support person.

7.4 Service Animals

Persons with disabilities who are accompanied by their service animal will be permitted to keep that animal with them in premises that members of the public are permitted to enter.
In the event the animal is excluded by law, such as in a food preparation area, MODC must ensure other measures are available to enable the person with a disability to obtain, use or benefit from MODC programs, services, and facilities. Staff will respectfully explain why the animal is excluded and determine what other arrangements can be made.

When addressing service users that have different needs, such as a person that has a service animal and a person that has an allergy to animals, staff will determine how to best meet the needs of both individuals and observe the rights of all individuals involved. See the Ontario Human Rights Commission Policy on Competing Rights for guidance.

A person with a disability is responsible for the control of their service animal at all times. If the service animal is not kept under control, has bitten another person or animal, or is a menace to the safety of other persons or animals, the service animal may be required to leave the premises. If this occurs the person will be permitted to continue to access MODC's programs, or services without the animal. In addition, MODC employees will, upon request, consider alternate accommodations for the person in such circumstances. MODC may refuse to permit the service animal to accompany the person until steps have been taken to correct the situation, and the issue has been resolved. See MODC's Service Animals, Support Persons and Assistive Devices Protocol.

7.5 Notice of Service Disruptions

MODC will give notice of any temporary planned or unplanned service disruption of facilities, services or systems that are relied upon by people with disabilities to access MODC programs, services or facilities, such as elevators, lifts, or accessible washrooms. In the event of an unexpected disruption, notice will be provided as soon as possible. Notice will include information about the reason for the disruption, its anticipated duration and a description of alternative facilities, services or systems that are available. Notice will be given by posting the information in a prominent place on premises owned or operated by MODC, posted on MODC's website or social media, included on telephone recordings, or by other methods as is reasonable under the circumstances.

8. Employment Standard Requirements

MODC will foster an inclusive workforce and provide equitable treatment and accommodation to ensure barrier-free employment. The requirements in this section only apply to employees, volunteers and students of MODC.

8.1 Recruitment, Assessment and Selection Process

MODC posts information about the availability of accommodation for internal and external applicants with disabilities in job postings and on our Careers web page. Job applicants who are individually selected for an interview/test will be notified via the assessment invite that accommodation is available upon request. MODC will consult with an applicant who requests accommodation and, in accordance with MODC's Employment Accommodation Policy/resources will arrange for suitable accommodation, in a timely manner that takes into account the applicant's accessibility needs. Successful applicants will be notified about MODC's policies for accommodating our people with disabilities in their Offer of Employment letter.

8.2 Employee Supports

MODC will provide information about disability related supports to new employees, volunteers and students through employment agreements and orientation materials (Onboarding). Our people will also receive communications whenever there is a change to our accessibility policies/process and/or their job function/duties.

8.3 Accessible Formats and Communication Supports for Employees

Accessible formats and communications are available upon a request to a people leader or via the *Confidential People Accessibility Accommodation Form,* available from the Health, Safety and Wellness team. MODC will consult with the requestor to arrange for accessible formats and communication supports:

- For information that is needed to perform the employee's job;
- For information that is generally available to employees in the workplace; and
- To determine the suitability of an accessible format or communications support.

8.4 Workplace Emergency Response Information

Upon an employee's request to their leader or, via the *Confidential People Accessibility Accommodation Form,* available from the Health, Safety and Wellness team, MODC will provide individualized emergency response information to individuals who identify potential accessibility barriers when responding to emergency situations. Information on our individualized workplace emergency response process will be provided as soon as practicable after becoming aware of the need for disability related accommodation. If disability related assistance is needed, MODC will seek consent from the individual to provide the individualized emergency response information to the person(s) designated to provide assistance. The information will be reviewed when the individual moves to a different location, when the individual's accommodation needs change, when overall accommodation plans are reviewed and when MODC reviews its general emergency response plans.

8.5 Individual Accommodation Plans

MODC's Employment Accommodation Policy/resources articulates MODC's commitment to the development and maintenance of confidential documented individual accommodation plans to support employees, volunteers and students with disabilities. If applicable, individual accommodation plans may include information regarding plans for accessible formats and communication supports, as well as individualized workplace emergency response information.

8.6 Return to Work Process

MODC's documented return to work process for individuals returning to work following an illness or injury where disability-related accommodations are required is managed by the Health, Safety and Wellness team in alignment with our collective agreements.

8.7 Performance Management, Career Development, and Redeployment

MODC's performance management, career development and redeployment processes include provisions to address the needs and/or barriers of our people living with a disability and/or who have individual accommodation plans, with the goal of fostering equality.

9. Built Environment and Public Spaces Requirements

MODC will ensure accessibility at all its facilities and public spaces by designing with accessibility in mind.

9.1 Accessibility Requirements in Codes and Standards

MODC will adhere to Building Code sections on Barrier-Free Design, the AMA and AODA, IASR Design of Public Spaces Standards that establish the minimum threshold for accessibility in our built environment.

9.2 AODA Design of Public Spaces, Additional Requirements

In addition to technical design requirements for making public spaces accessible, MODC will abide by requirements for service environments, maintenance of accessible elements and will consult people with disabilities regarding accessibility of outdoor play spaces and rest areas, as applicable.

9.3 Obtaining Services

When constructing or replacing service counters, fixed queuing guides and waiting areas, MODC will make them accessible to people with disabilities.

9.4 Maintenance of Accessible Elements

MODC has a process in place for preventative and emergency maintenance and temporary disruptions of accessible elements in public spaces that can be accessed by emailing facilitysupport@marchofdimes.ca

10. AODA Reporting Requirements

MODC will submit completed compliance reports in accordance with the schedule set out in the AODA for non-profit, large organizations.

11. Review and Amendments

This policy is reviewed and amended as necessary in alignment with the AODA Compliance Report Schedule for large, non-profit organizations.

12. Contacts and Other Resources:

For more information/further guidance about this policy, employees may speak with their manager or director, or contact the People and Culture Department at PeopleAndCulture@marchofdimes.ca.

The following are reference documents and resources that provide additional information available to employees online in the Policies & Procedures Library:

- Strategic Plan
- Multi-Year Accessibility Plan
- Accessible Customer Service Policy
- Respectful and Inclusive Workplace Policy and resources
- Employment Accommodation Policy and resources

** Documents can be made available in alternate formats and/or with communication supports upon request. Please contact policy@marchofdimes.ca to let us know your needs. We will work with you to provide the information in a way that is accessible for you in a timely manner.*