



**YMCA  
Accessibility and  
Customer Service Policy**



YMCA of Western Ontario

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*Building healthy communities*



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## 1 INTRODUCTION / OBJECTIVE

The YMCA of Western Ontario is committed to Diversity and Social Inclusion and to meeting its obligation under Ontario's *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*, by providing accessible environments that respect the rights of every individual.

The purpose of the Accessible Customer Service Policy is to foster inclusive YMCA environments, and to ensure that any accessibility-related complaints are dealt with promptly and effectively through consistently applied procedures.

## 2 POLICY STATEMENT

The YMCA recognizes the dignity and worth of every individual and seeks to create socially inclusive environments in which everyone, including persons with disabilities, is able to participate fully. Building on a culture that embraces diversity and supports social inclusion, the YMCA is a shared experience for everyone to enjoy.

## 3 RELATED POLICIES / REFERENCE DOCUMENTS

- Human Rights Policy – our obligation under Ontario's Human Rights Code

## 4 DEFINITIONS

The following terms are used in this policy:

**Accommodation** is a way, through reasonable efforts or measures, of preventing or minimizing barriers that impede a person with a disability from fully participating in the services offered.

**Example:**

Accommodation means permitting a member or program participant to use their personal assistive device, or to be accompanied by their support person, or their guide dog or service animal unless the animal is excluded by another law, in order to increase accessibility to YMCA programs.

**Assistive device** is any device that helps a person with a disability do everyday tasks and activities. Assistive devices include digital audio players, hearing aid, teletypewriter (TTY) for people unable to speak or hear by phone, mobility devices (such as scooters, walkers or crutches, or white canes, oxygen tanks), and speech generating devices. Note: Bell has a Relay Service from any phone for free (1-800-855-0511).



**Barrier** is anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability. This may include architectural or physical barriers, an information or communications barrier making it difficult for people to receive or send information, an attitudinal barrier, a technological barrier, a policy, or a practice.

**Customer** is any person who uses the services of the YMCA.

**Disability** means:

- a) any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness,
- 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.

**Service animal** is any animal being used by a person for reasons relating to his or her disability, and it is readily apparent or is supported by a letter from a physician or nurse.

**Support person** is another person who accompanies a person with a disability to help with communication, mobility, personal care or medical needs, or with access to programs and services offered by the YMCA.

## 5 LEGISLATIVE CONTEXT

### Accessibility for Ontarians with Disabilities Act, (2005)

The AODA details specific requirements and standards for accessibility in Ontario. Standards include *Accessibility Standards for Customer Service* which requires the YMCA to make reasonable efforts to ensure that its policies, practices, and procedures relating to the delivery of services are consistent with the principles of dignity, independence, integration, and equal opportunity.

## 6 ROLES AND RESPONSIBILITIES

All managers and supervisors shall:

- Monitor and support staff in implementing the Accessible Customer Service Policy in their program or process area(s);



- Ensure that their program area(s) facilitate the use by persons with disabilities of their personal assistive devices, service animals, allow access for their support person, as outlined below, when accessing the program and moving through the building;
- Arrange training in accessibility standards for front-line staff and program volunteers interfacing with members or customers. Contact the the Vice President Human Resources for more information on training resources available;
- Ensure notice of temporary disruption is provided as outlined below;
- Respond to feedback including any accessibility-related issues or concerns as outlined below.

All staff, including program volunteers, shall:

- Participate in required training related to Accessibility Standards for Customer Service;
- Support the implementation of Accessibility Standards by providing service in a manner that respects the dignity and independence of persons with disabilities, including permitting the use of assistive devices, service animals and support persons as outlined below. Suggested practices and tips for providing customer service for persons with disabilities are available by contacting a supervisor;
- Forward any feedback from members or customers regarding accessibility to their immediate supervisor or manager for handling.

The Vice President Human Resources shall ensure that processes are put in place to:

- Identify training needs Association-wide;
- Ensure that mechanisms are put in place to support supervisors implementing Accessibility Standards for Customer Service or responding to accessibility-related concerns;
- Ensure that AODA reporting requirements on implementation of Accessibility Standards for Customer Service are completed and forwarded to the Ontario government;
- Ensure that YMCA's policies, practices, and procedures related to the AODA are available to any person upon request;
- Ensure that communications with persons with disabilities are done in a manner that takes into account their individual circumstances.

## **7 PROCEDURES FOR USE OF ASSISTIVE DEVICES, SERVICE ANIMALS, SUPPORT PERSONS**

### **7.1 Use of Assistive Devices**

Persons with disabilities may use their own personal assistive devices while accessing or using YMCA programs or services in any premise owned, leased or operated by the YMCA. Possible barriers to the use of assistive devices will be removed where they can be.



## **7.2 Use of Service Animals**

Service animals are permitted to accompany any person with a disability while accessing or using YMCA programs or services in any premise owned, leased or operated by the YMCA, except where animals are excluded by law.

Where an animal is excluded by law from the premises, or may affect the health and safety of other customers, other measures will be explored in order to provide service to the person with a disability.

Where it is not readily apparent that an animal is a service animal, the YMCA may request a letter from a physician or nurse confirming that the animal is used by the person for reasons relating to his or her disability.

## **7.3 Use of Support Persons**

Any person with a disability who is accompanied by their support person will be permitted to access and use a YMCA program or service with his or her support person.

In most cases, program fees shall be waived for the support person, provided that the support person remains beside the person with a disability when accessing and using a program or service, and while moving through the building or on YMCA property. However, where a YMCA program or registration fee is charged and a portion of revenues are payable to a third party, or where a fee includes or covers such costs as food or accommodation, the support person may be required to cover these costs. If any amount is payable by the support person, the YMCA shall ensure that notice is given in advance about the amount, if any, that is payable in respect of the support person.

The YMCA may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

## **8 NOTICE OF TEMPORARY DISRUPTIONS**

The YMCA is committed to informing stakeholders of any temporary disruption of service at any of its program sites. A temporary disruption means a short-term planned or unplanned disruption to facilities or services. Potential temporary disruptions may include evacuations or relocation due to fire, flood, or mechanical failures, power outage, elevator out of service, or programs moved or cancelled.

Onsite managers shall notify the public, including people with disabilities, of any temporary disruptions. Notice shall include information about the reason for the disruption, how long it will likely last, and information about other facilities or services (if any) that are available. Notice



may be given by posting the information on the premises, on the YMCA website, voicemail messaging or by any other reasonable method.

## 9 FEEDBACK PROCESS

Feedback mechanisms provide the YMCA with opportunities to learn and improve.

A YMCA member including a participant, member, parent, donor, contractor or other member of the public is encouraged to bring forward a complaint or concern, or a compliment, or to make suggestions on ways to improve programs and services and their YMCA experience, by contacting their local YMCA General Manager, or Director directly. This may be done verbally at the Centre, by completing a Comment Card, or visiting our website at [www.ymcawo.ca/complaints-policy](http://www.ymcawo.ca/complaints-policy). Issues regarding accessibility will be addressed with the individual within 48 hours of submission. This feedback process will be provided upon request to all individuals including those with disabilities. Accommodations will be made to provide this feedback mechanism in a format that meets the individual's needs.

## 10 TRAINING

All employees will receive training regarding YMCAWO AODA policies and practices within 3 weeks of their date of hire. As new training requirements are made mandatory, these will be added and employees will be fully trained by the prescribed deadline.

Below is a summary of what the current AODA training will provide:

- An overview of the Accessibility for Ontarians with Disabilities Act, 2005
- A review of the YMCA of Western Ontario's AODA policy and plan related to all current standards of the AODA

### **AODA Customer Service Training**

- > AODA Customer Service Standard Legislation and the requirements of the standard
- > Interacting and communicating with individuals with various disabilities
- > How to interact with people who use an assistive device or require the assistance of a service animal or support person
- > What to do if a person with a disability is having difficulty in accessing YMCAWO's services
- > How to use equipment or devices available on site that may help with providing services. This includes:
  - Training for Aquatics staff on chair lifts for the pool
- > Understanding service disruptions and feedback

### **Understanding Human Rights Training— AODA**

- > Review the Ontario Human Rights Code
- > Explain key components of Human Rights in Ontario



> Explain how these important pieces of legislation apply to the requirements outlined under the Accessibility for Ontarians with Disabilities Act (AODA)

### **Integrated Accessibility Standards — Information/ Communication and Employment Standards**

- > Integrated Accessibility Standards - Introduction and Overview of General Requirements
- > Integrated Accessibility Standards - Information & Communication Standard
- > Integrated Accessibility Standards - Employment Standard

## **11 RESOURCES AVAILABLE**

The YMCA's policies, practices and procedures related to the AODA are available to the public upon request. Where a request is made for a document by a person with a disability, the YMCA shall provide the information contained in the document in a format that takes into account the person's disability.

In addition, the following are sources for information about Accessibility Standards in Ontario:

- To view the Accessibility for Ontarians with Disabilities Act, or Ontario Regulation 429/07 Accessibility Standards for Customer Service, visit [www.e-laws.gov.on.ca](http://www.e-laws.gov.on.ca)
- To review requirements under the Accessibility for Ontarians with Disabilities Act or for additional resources about accessibility, visit [www.mcass.gov.on.ca/mcass](http://www.mcass.gov.on.ca/mcass)
- More information about the customer service standard for accessibility is also available at [www.AccessON.ca/compliance](http://www.AccessON.ca/compliance)

## **12 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 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 Principles**

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

- A. Accessible Formats and Communication Supports
- B. Exceptions

### **A. Accessible Formats and Communication Supports**

Unless deemed unconvertible, YMCAWO 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.

YMCAWO 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.

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

### **B. 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, YMCAWO will ensure that the individual who made the request is provided with an explanation and a summary of the information. YMCAWO 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.



## 13 AODA – Integrated Accessibility Standards Regulation (IASR)

### Employment Policy

#### General Principles

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

- A. Recruitment, Assessment and Selection
- B. Accessible Formats and Communication Supports for Employees
- C. Workplace Emergency Response Information
- D. Documented Individual Accommodation Plans
- E. Performance Management and Career Development and Advancement
- F. Return to Work
- G. Redeployment
- H. Review

#### A. Recruitment, Assessment and Selection

YMCAWO will include on all job postings that accommodation may be available 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, YMCAWO will consult with the applicant and provide or arrange for suitable accommodation.

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

#### B. Accessible Formats and Communication Supports for Employees

YMCAWO 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, YMCAWO 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.

YMCAWO will consult with the employee making the request to determine the best way to provide the accessible format or communication support.



### **C. Workplace Emergency Response Information**

Where required, YMCAWO 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
- reviews general emergency response policies.

### **D. Documented Individual Accommodation Plans**

YMCAWO will also develop accommodation plans for employees with disabilities. The following must occur:

- employee must be consulted in the development of the plan
- include how the employee will be assessed in the plan
- the employee may request an evaluation by an outside medical expert at the cost to the association to determine how the accommodation can be achieved
- personal information about the employee must be stored in the HR file for security purposes
- include the duration of the plan and the frequency that it will be reviewed and updated
- provide the plan in a format that meets the accessibility needs of the employee

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

YMCAWO 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.

### **F. Return to Work**

YMCAWO has developed and implemented a return to work process 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 is outlined within the HR Manual.

### **H. 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.



## **I. Review**

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