

# **INTEGRATED ACCESSIBILITY STANDARDS REGULATION**

## **MULTI-YEAR ACCESSIBILITY PLAN**

Catholic Cemeteries & Funeral Services – Archdiocese of Toronto (CCFS) is committed to treating all people in a way that allows them to maintain their dignity and independence. To accomplish this, we established Policies and Procedures outlined by the Accessibility Standard for Customer Service under the Accessibility for Ontarians with Disabilities Act, 2005 (AODA). Building on this, CCFS has also developed Policy and Procedures whose goal is to remove barriers for persons with disabilities within the organization as well as for those visiting the properties, as required by the following four Standards outlined in the Integrated Accessibility Standards Regulation (IASR) 191/11 under the AODA:

### **GENERAL REQUIREMENTS STANDARD**

#### **SECTION 3: Establishment of Accessibility Policies**

CCFS has developed and maintains its Accessibility Policies governing the accessibility requirements as per the Regulation effective January 1, 2014.

#### **SECTION 4: Accessibility Plans**

CCFS has developed its Accessibility Plan outlining our strategies to prevent and remove barriers to ensure requirements continue to be met under the Regulation effective January 1, 2014. We are also committed to making this Accessibility plan available to the public in an accessible format upon request and to review and update the plan in five-year intervals or as required.

#### **SECTION 7: Training**

CCFS has developed a training program highlighting all of the requirements of the accessibility standards referred to in the Regulation and in the Human Rights Code effective January 1, 2015. This training is completed by all the employees and all persons who participate in developing the company's policies and procedures.

## **INFORMATION AND COMMUNICATION STANDARD**

### **SECTION 11: Feedback:**

CCFS has processes in place for receiving and responding to feedback and ensures that the processes are accessible to persons with disabilities by providing or arranging for accessible formats and communication supports upon request as per the required legislated effective January 1, 2015.

### **SECTION 12.1 - 12.3: Accessible Formats & Communication Supports**

CCFS shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no extra cost to the person making the request. It is understood that the accommodation is negotiable. CCFS also has a mechanism for notifying the public of the availability of accessible formats and communication supports as per the required legislation effective January 1, 2016.

### **SECTION 14.2: Accessible Websites & Web Content**

CCFS conforms to World Wide Web Consortium Web and has adopted the WCAG 2.0 Level A to AAA in accordance with the schedule set out in the required Regulation effective January 1, 2021.

## **EMPLOYMENT STANDARD**

### **SECTION 22: General Recruitment**

CCFS has a policy in place notifying its employees and the public about the availability of accommodation for applicants with disabilities in the recruitment process as per the required legislation effective January 1, 2016.

### **SECTION 23.1 – 23.2: Recruitment Assessment or Selection Process**

During its recruitment process CCFS notifies job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are made available upon request in relation to the recruitment materials and/or processes to be used.

Should an applicant request an accommodation, CCFS will consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that

considers the applicants accessibility needs due to the disability as per the required legislation effective January 1, 2016.

### **SECTION 24, 25.2 & 25.3: Notice to Successful Applicants**

CCFS when making an offer of employment notifies the successful applicant of its policies for accommodation for employees with disabilities.

CCFS once informed that the candidate will require some form of accommodation provides notice of information to the new employee as soon as practical after they begin their employment.

CCFS provides updated information to its employees when there is a change to existing policies on the provisions of job accommodations that considers an employee's accessibility needs due to disability.

All requirements of this Section of the Regulations have been implemented as per the required legislation effective January 1, 2016.

### **SECTION 26.1 – 26.2: Accessible Formats & Communication Supports for Employees**

In addition to the obligations as per the AODA - INFORMATION AND COMMUNICATIONS STANDARD, CCFS consults with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform the employee's job and, information that is generally available to employees in the workplace. The accessible format would be negotiated with the employee as per the required legislation effective January 1, 2016.

### **SECTION 27.1 to 27.4: Workplace Emergency Response Information**

CCFS provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and the employer is aware of the need for the accommodation due to the employee's disability.

If the employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, CCFS provides workplace emergency response information to the person designated by the employer to provide assistance to the employee. CCFS supplies the information required under this section as soon as is practicable after the employer becomes aware of the need for the accommodation.

CCFS reviews the individualized workplace emergency response information when the employee moves to a different location within the organization and/or, when the

employee's overall accommodation needs or plans are reviewed and/or when the employer reviews its general emergency response policies.

All requirements of this Section of the Regulations have been completed as per the required legislation effective January 1, 2012.

## **SECTION 28 & 28.2: Documented Individual Accommodation Plans**

CCFS has developed and maintains a written process for the development of documented individual accommodation plans for employees with disabilities as per the required legislation effective January 1, 2016.

The process for the development of the documented individual accommodation plans includes the following elements:

- a) The manner in which the employee requesting accommodation can participate in the development of the plan.
- b) The means by which the employee is assessed on an individual basis.
- c) The manner in which the employer can request an evaluation by an outside medical or other, expert, at the employer's expense, to determine if and how accommodation can be achieved.
- d) The manner in which the employee can request the participation of a union representative if they belong to one, or some other form of representation from the workplace, if they do not belong to one, in the development of the accommodation plan.
- e) The steps taken to protect the privacy of the employee's personal information.
- f) The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
- g) If an individual accommodation plan is denied, the manner in which the reasons for the denial is communicated to the employee.
- h) The means of providing the individual accommodation plan in a format that takes into account the employees accessibility needs due to disability.

## **SECTION 29, 29.2 & 29.3: Return to Work Process**

CCFS has developed and has in place a return to work process for its employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work, including documentation of the process as per the required legislation effective January 1, 2016.

This return to work process outlines the steps the employer will take to facilitate the return to work of employees who were absent because their disability required them to be away from work and, uses individual documented accommodation plans.

The return to work process outlined in this section does not replace or override any other return to work process created by or under any other statute.

### **SECTION 30.1: Performance Management**

CCFS considers the accessibility needs of the employee with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities as per the required legislation effective January 1, 2016.

### **SECTION 31: Career Development & Advancement**

CCFS considers the accessibility needs of its employees with disabilities as well as any individual accommodation plans, when providing career development and advancement to its employees with disabilities as per the required legislation effective January 1, 2016.

### **SECTION 32: Redeployment:**

CCFS considers the accessibility needs of its employees with disabilities, as well as individual accommodation plans, when redeploying employees with disabilities as per the required legislation effective January 1, 2016.

## **DESIGN OF PUBLIC SPACES STANDARDS (ACCESSIBILITY STANDARDS FOR THE BUILT ENVIRONMENT)**

### **SECTION 80.21: Exterior Paths of Travel**

CCFS ensures that any exterior paths of travel that are constructed or redeveloped are maintained as per the requirements set out in O. Reg. 413/12, s. 6. and as per the required legislation effective January 1, 2017.

### **SECTION 80.24: Exterior Paths of Travel and Ramps**

CCFS ensures that when placing a ramp on an exterior path of travel, the ramp will meet all the requirements outlined in this section. In addition, the ramp will meet the specified requirements that apply to landings, the railings, and openings in the surface of the ramp as per the required legislation effective January 1, 2017.

### **SECTION 80.25: Exterior Paths of Travel and Stairs**

CCFS ensures that where stairs connect to exterior paths of travel, the stairs meet all the requirements outlined in this regulation and section as per the required legislation effective January 1, 2017.

### **SECTION 80.32: Accessible Parking, Off Street Parking**

CCFS ensures that when constructing new or redeveloping off street parking facilities that they are maintained and meet the requirements that are set out in O. Reg. 413/12, s. 6 as per the required legislation effective January 1, 2017.

### **SECTION 80.41: Obtaining Services and Service Counters**

CCFS ensures that when constructing a new service counter, which includes replacing an existing service counter, to follow the requirements outlined in O. Reg. 413/12, s. 6. as per the required legislation effective January 1, 2017.

### **SECTION 80.43: Obtaining Services and Waiting Areas**

CCFS ensures that there is space available for an individual using a mobility aid who may have to wait for a period of time in an area as per O. Reg. 413/12, s. 6. as per the required legislation effective January 1, 2017.

### **SECTION 80.44: Maintenance of Accessible Elements**

CCFS ensures that the Multi-Year Accessibility Plan includes: procedures for preventative and emergency maintenance of the accessible elements in public spaces as required and procedures for dealing with temporary disruptions of accessible elements in public spaces take place as per the required legislation effective January 1, 2017.