



LEAF
FAEJ

WOMEN'S LEGAL
EDUCATION & ACTION FUND
FONDS D'ACTION ET D'ÉDUCATION
JURIDIQUE POUR LES FEMMES

Accessibility Policy

Statement of Commitment

The Women's Legal Education and Action Fund (LEAF) is committed to providing a respectful, accessible, and inclusive environment for all those using LEAF goods and services, including its employees and volunteers. Our goal is to meet or exceed the standards outlined in the *Accessibility for Ontarians with Disabilities Act* (AODA). LEAF strives at all times to respect the dignity and independence of people with disabilities and to identify, remove, and prevent barriers to goods, services, and employment opportunities provided by LEAF.

Background

The purpose of the *Accessibility for Ontarians with Disabilities Act* (AODA) is to identify, remove, and prevent barriers for people with disabilities and to work towards achieving a fully accessible Ontario by 2025. All organizations in Ontario with one or more employees must adhere to the following Accessibility Standards, as compliance dates come into effect:

- Integrated Accessibility Standards Regulation (IASR) (Ontario Regulation 191/11)
 - Customer Service
 - Information and Communications
 - Employment
 - Transportation
 - Design of Public Spaces (Built Environment)

What is considered a disability under the AODA and its standards?

The AODA uses the same definition of “disability” as the *Ontario Human Rights Code*, which includes both visible and invisible disabilities. All disabilities – whether temporary, short-term, long-term, or permanent – are included in this definition. It is important to understand that the emphasis of the AODA is not on specific disabilities, but is on removing barriers to accessibility of goods and services.

Some examples of types of disabilities covered by the AODA include:

- Mobility
- Vision
- Hearing
- Speech or communication
- Mental health
- Developmental or intellectual
- Chronic diseases or conditions

Guiding principles

The principles of the AODA assist LEAF and its employees and volunteers in taking reasonable efforts and making decisions to ensure that goods and services are as accessible and inclusive as possible. LEAF will ensure that this Policy and any related practices or procedures are consistent with the four guiding principles of the AODA. These principles focus on recognizing that all people with disabilities are entitled to:

- **Dignity** – Treating people with dignity means not treating people with disabilities as an afterthought or forcing them to accept lesser quality or convenience, but instead ensuring people with disabilities are valued and treated with respect.
- **Independence** – Ensuring independence means creating an environment in which people with disabilities are able to do things and make decisions on their own, without unnecessary help or interference from others.
- **Integration** – Integration ensures that people with disabilities are able to benefit from the same goods, services, and interactions in the same place and in the same or similar ways as people without disabilities.
- **Equal opportunity** – Equal opportunity means ensuring that people with disabilities are given access to the same choices, benefits, goods, services, and opportunities as people without disabilities.

Purpose

This Accessibility Policy is intended to fulfill the policy requirements of the Integrated Accessibility Standards Regulation (IASR) (Ontario Regulation 191/11).

Application

This policy outlines responsibilities that apply to all employees and volunteers authorized by LEAF and involved in providing goods or services on behalf of LEAF. LEAF employees and volunteers outside of Ontario must also comply with the relevant federal and provincial legislation relating to accessibility.

Availability of AODA Accessibility Policy

All relevant documents required by the Customer Service Standard, including this Accessibility Policy, will be made available upon request. The Accessibility Policy will be kept up-to-date and maintained on the LEAF website www.leaf.ca and will also be included as part of employee training.

Customer Service and Information and Communication

LEAF is committed to providing accessible and inclusive customer service, including accessible information and communication, to people with disabilities.

Assistive devices

LEAF employees will provide and communicate reasonable measures to ensure that customers with disabilities may use their own personal assistive devices (for example, hearing aids, wheelchairs, walkers, oxygen tanks) as needed to access LEAF facilities and services.

LEAF will provide training and resources to ensure that employees and volunteers are familiar with various assistive devices that may be used by customers with disabilities while accessing our facilities and services.

Communication and format of documents

LEAF employees and volunteers will communicate with people with disabilities in a manner that takes into account their disability.

LEAF will provide training to employees and volunteers on how to interact and communicate with people with various types of disabilities.

LEAF will provide documents in accessible formats that take into account the disability and information needs of individuals making the request.

Notice of disruption of services

In the event of temporary disruptions to accessible LEAF facilities or services, all reasonable efforts will be made to provide advance notice of the disruption. This will include communicating information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

In some circumstances, such as in a situation of unplanned or emergency temporary disruptions, advance notice might not be possible, but notice will be provided as soon as possible.

When disruptions occur, notice will be provided by any method that may be reasonable under the circumstances. LEAF staff will make every effort to provide notice by posting notices in conspicuous places including at the point of disruption, at the main entrance, and at the nearest entrance to the service disruption.

A procedure addressing the notice of disruption of services will include relevant information describing:

- under what circumstances notice will be provided about a temporary disruption;
- where notice will be posted;
- what steps will be taken when an unexpected disruption occurs;

- information that will be included in the notice of a temporary disruption; and
- what alternative facilities or services, if any, can be made available during the temporary disruption to continue to provide service to people with disabilities.

Feedback process

LEAF encourages and welcomes feedback regarding accessibility to services and the manner in which LEAF employees and volunteers interact with people with disabilities. A feedback form and procedure have been established for people to provide feedback and for staff to respond.

Training

LEAF recognizes the importance of understanding how to provide accessible customer service. All employees and volunteers are required to receive training regarding how to provide accessible customer service.

LEAF management will ensure that the following persons receive AODA and accessibility training or confirm that they have received such training:

- contractors who act on behalf of LEAF; and
- individuals who participate in developing LEAF policies.

Training will be provided to each LEAF employee within 30 days or as soon as is reasonable based on assigned duties.

At minimum, training will cover the following:

- a review of the purposes and principles of the AODA and requirements of the Customer Service standard;
- a review of this Accessibility Policy and related forms and procedures;
- how to interact and communicate with people with various types of disabilities;
- how to interact with people with disabilities who use assistive devices or require the assistance of a guide dog, other service animal, or a support person;
- how to use equipment or devices available at LEAF premises, if any, that are provided to help people with disabilities access LEAF facilities or services; and
- what to do if a person with a disability is having difficulty accessing LEAF facilities, goods, or services.

LEAF will ensure that accurate and up-to-date training records are maintained in each employee's personnel file. These records are recorded for training and administrative purposes, and are subject to the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA).

Guide dogs and service animals

LEAF allows and welcomes people with disabilities to bring a guide dog or service animal with them to LEAF facilities open to the public or required for delivery of goods and services, unless otherwise prohibited by law. For example, Ontario Regulation 562 under the *Health Protection and Promotion Act* states that animals are not allowed in places where food is manufactured, prepared, processed, or handled.

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

If a health or safety concern presents itself (for example, another client or staff member has a severe allergy to the guide dog or service animal), LEAF employees will make all reasonable efforts to meet the needs of all individuals involved.

Support persons

LEAF permits and welcomes people with disabilities who are accompanied by a support person to bring that support person with them to access facilities and services open to the public or required for services.

Employment

LEAF is committed to accessible and inclusive employment practices. LEAF staff will notify the public and staff that, when requested, LEAF will accommodate disabilities during recruitment and assessment processes and when people are hired.

If using performance management, career development and redeployment processes, LEAF staff will take into account the accessibility needs of employees with disabilities.

Hiring

LEAF is committed to being inclusive in our hiring policies. During our hiring process, we will notify the public that we will make every effort to accommodate the needs of people with disabilities.

During the hiring process, we will include the following paragraph in print or online job postings:

LEAF welcomes and encourages applications from people with disabilities. Where possible, accommodations will be made available upon request for candidates taking part in all aspects of the selection process.

When scheduling an interview, we will inform job applicants that every effort will be made to provide requested accommodations.

If an interview candidate requests an accommodation, we will discuss a candidate's needs with them and make every effort to make adjustments to support them.

Workplace information

Upon request, LEAF will provide workplace information in an accessible format. This includes:

- any information employees need to perform their jobs (e.g. job descriptions and manuals); and
- general information that is available to all employees at work (e.g. company newsletters, bulletins about company policies and health and safety information).

If a person with a disability requests accessible information or requires communication supports, LEAF will work with them to determine how to meet their needs.

While information in accessible formats required might not be readily available, LEAF will provide the information in a timely manner.

LEAF commits to providing accessible emergency information to staff.

If an employee indicates that they will require accommodation during an emergency, LEAF will work with the employee to develop an individual emergency response plan where accommodation to emergency plans and procedures is required.

Communication of accessibility policies

LEAF will inform all employees about policies to support people with disabilities. Our Accessibility Policy will be reviewed with new employees when they are hired, and all current employees will be informed if we modify our Accessibility Policy.

Design of Public Spaces

LEAF is committed to ensuring that any new or redeveloped public spaces that LEAF is responsible for – including service counters, waiting areas with fixed seating, fixed queuing guides, parking lots – will be designed or procured to be accessible and inclusive.

LEAF will make every effort to meet required Accessibility Standards for the Design of Public Spaces when building or making major modifications to public spaces (for example, entrances or washrooms).

Kiosks

If LEAF is responsible for the design, procurement, or acquisition of any self-service kiosks, we will ensure that accessibility of these kiosks is considered and incorporated during design, procurement, or acquisition.

Modifications to this or other policies

Any LEAF policies that do not respect and promote the dignity and independence of people with disabilities will be modified or removed.

Definitions

Assistive devices are devices intended to assist people with disabilities (for example, walking aids or hearing aids).

Disability is defined as follows:

- 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 a 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 describes a dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act* to act as a guide dog for people who are visually impaired.

Service animal is an animal used by a person with a disability when

- it is readily apparent that the animal is used by the person for reasons relating to his or her disability (e.g., the animal is wearing a harness, saddle bags, or a sign that identifies the animal as a service animal)
- the person provides a letter from a regulated health professional confirming that the person requires the animal for reasons relating to a disability (the letter does not need to identify a specific disability or specifically how the animal is needed or used)
- the person provides a certificate of training from a recognized guide dog or service animal training school; or
- the person provides a valid identification card signed by the Attorney General of Canada.

Support person describes an individual who accompanies a person with a disability in order to provide services or assistance with communication, mobility, personal care, medical needs or access to goods or services. A support person could be a paid personal support worker, a volunteer, a friend or a family member and does not necessarily need to have special training or qualifications.