



**ACCESSIBILITY PLAN
2017**

Note: Subsections below correspond with subsections of Ontario Regulation 191/11 made under the Accessibility for Ontarians with Disabilities Act, 2005

Section I: General	ACTION PLAN/ STATUS	Compliance Date	Status
3.0 Establish Accessibility Policies			
<i>3.1 Develop, implement and maintain policies governing how Hamilton CAS achieves or will achieve accessibility through meeting its requirement referred to in IASR.</i>	<ul style="list-style-type: none"> Developed an Accessibility Policy that demonstrates Hamilton CAS's commitment to becoming more accessible and a plan to achieve compliance with IASR through ongoing policy review. 	January 1, 2014	Completed <input checked="" type="checkbox"/>
<i>3.2 Include a statement of organizational commitment to meet the accessibility needs of persons with disabilities in a timely manner in Hamilton CAS policies.</i>	<ul style="list-style-type: none"> Developed a statement of organizational commitment and have incorporated it into an Accessibility Policy and included it in the Accessibility Plan and Accessibility Standards for Customer Service Policy 	January 1, 2014	Completed <input checked="" type="checkbox"/>
4.0 Accessibility Plans			
<p>4.1 Hamilton CAS shall;</p> <ul style="list-style-type: none"> establish, implement, maintain and document a multi-year accessibility plan, which outlines the organization's strategy to prevent and remove barriers and meet its requirements under IASR; Post the accessibility plan on our website and provide the plan in an accessible format upon request; Review and update the accessibility plan at least once every five years 	<ul style="list-style-type: none"> Accessibility Plan developed and approved by the Senior Management Team. Accessibility Plan posted on our website and will be made available in accessible formats upon request Accessibility Plan will be reviewed at least every five (5) years The Hamilton CAS will annually update the status of the Plan to ensure compliance with the IASR. 	January 1, 2014	Completed <input checked="" type="checkbox"/>
7.0 Training			
<i>7.1 Hamilton CAS will provide training to all employees, volunteers, all persons who participate in developing the organization's policies and all other persons who provide goods, services or facilitates on</i>	<ul style="list-style-type: none"> Hamilton CAS has provided training on AODA Customer Service Standards to all employees, volunteers, students on placement and third parties operating on behalf of Hamilton CAS The Hamilton CAS will utilize the training materials that will be 	January 1, 2012 <hr/> January 1,	Completed <input checked="" type="checkbox"/> Completed

<p><i>behalf of the Hamilton CAS on Ontario's accessibility laws and on the Human Rights Code as it relates to people with disabilities.</i></p> <ul style="list-style-type: none"> <i>Hamilton CAS will provide training in a way that best suits the duties of the employees, volunteers and other staff members.</i> 	<p>developed in house as well as training materials developed by the Ontario government, OACAS and HRdownloads.</p> <ul style="list-style-type: none"> Training materials will be assessed and tailored to our target audience. Training on <i>Human Rights Code</i> and IASR has been provided to all employees, volunteers, students on placement and third parties operating on behalf of the Hamilton CAS. Ongoing training on AODA Customer Service Standard and on <i>Human Rights Code</i> and IASR through HRdownloads continues to be in place. 	<p>2015</p> <p>January 1, 2016</p>	<p><input checked="" type="checkbox"/></p> <p>Completed /Ongoing <input checked="" type="checkbox"/></p>
<p><i>7.3 Every person referred to in subsection 7.1 shall be trained as soon as practicable.</i></p>	<ul style="list-style-type: none"> The Hamilton CAS developed a training plan and provided training during 2014. 	<p>January 1, 2015</p>	<p>Completed <input checked="" type="checkbox"/></p>
<p><i>7.4 Hamilton CAS shall provide training in respect to any changes in the Accessibility policies described in section 3 on an ongoing basis.</i></p>	<ul style="list-style-type: none"> Any new or changed Accessibility policies are provided to employees, volunteers and other stakeholders and posted on our Intranet and Internet page 	<p>January 1, 2015</p>	<p>Completed/ Ongoing <input checked="" type="checkbox"/></p>
<p><i>7.5 Hamilton CAS shall keep a record of the training that is provided under section 7, including the dates on which the training is provided and the number of individuals to whom it is provided</i></p>	<ul style="list-style-type: none"> Human Resources currently maintains all employees, volunteer and other stakeholders training records. Placement Resources maintains all Foster Parents training records. 	<p>January 1, 2015</p>	<p>Completed/ Ongoing <input checked="" type="checkbox"/></p>
<p>Section II – Information and Communication Standards</p>	<p>ACTION PLANS/STATUS</p>	<p>Compliance Date</p>	<p>Status</p>
<p>11.0 Feedback</p>			
<p><i>11.1 Hamilton CAS shall ensure that the process for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports, upon request.</i></p>	<ul style="list-style-type: none"> Hamilton CAS Customer Service Standards Policy and AODA Employment Standards Policy address our current communication process for persons with disabilities and our organizational commitment. Feedback process is in place and notes that accessible formats and communication supports are available upon request. 	<p>January 1, 2015</p>	<p>Completed <input checked="" type="checkbox"/></p>
<p><i>11.3 This will not detract from obligations under the Accessibility Standards for Customer Care</i></p>	<ul style="list-style-type: none"> Hamilton CAS will ensure feedback process compliments our Accessibility Standards for Customer Service 	<p>January 1, 2015</p>	<p>Completed <input checked="" type="checkbox"/></p>
<p><i>11.2 Hamilton CAS shall notify the public about the availability of accessible formats and communication supports</i></p>	<ul style="list-style-type: none"> Feedback process is in place and ensures that accessible formats and communications supports are available upon request. This shall be communicated on our internet page A sign stating our Customer Feedback process is posted at reception along with a Customer Feedback Form that can be completed by anyone who requests to do so. 	<p>January 1, 2015</p>	<p>Completed <input checked="" type="checkbox"/></p>
<p>12.0 Accessible Formats and Communication Supports</p>			
<p><i>12. 1 Hamilton CAS shall, upon request, provide or arrange for the provision of accessible formats and communication supports for persons with disabilities,</i></p> <ul style="list-style-type: none"> <i>In a timely manner that takes into account</i> 	<ul style="list-style-type: none"> All publicly available information is made accessible upon request Accessibility Standards for Customer Service Policy with respect to Communication with persons with disability contains commitment to communicate with people with disabilities in ways that take into 	<p>January 1, 2016</p>	<p>Completed <input checked="" type="checkbox"/></p>

<p><i>the person's accessibility needs due to disability; and</i></p> <ul style="list-style-type: none"> • <i>At a cost that is no more than the regular cost charged to other persons.</i> 	<p>consideration their disabilities.</p> <ul style="list-style-type: none"> • Hamilton CAS has indicated possible accessible formats that may be requested 		
<p>12.2 <i>Hamilton CAS shall consult with the persons making the request in determining the suitability of an accessible format or communication support</i></p>	<ul style="list-style-type: none"> • Hamilton CAS Customer Service Policy & AODA Employment Standards Policy contains this requirement. 	January 1, 2016	Ongoing <input checked="" type="checkbox"/>
<p>12.3 <i>Hamilton CAS shall notify the public about the availability of accessible formats and communication supports.</i></p>	<ul style="list-style-type: none"> • Public is notified of accessible formats and communication supports through the Agency's website and signs that are posted in publically accessible areas such as the reception area and in the training center. • All internal and interagency training outlines have Hamilton CAS' commitment to providing accessible formats & communication guidelines to persons with disabilities when requested. 	January 1, 2016	Completed <input checked="" type="checkbox"/>
<p>14.0 Accessible Websites and Web Content</p>			
<p>14.2 <i>Hamilton CAS shall make internet website and web content conform to WCAG 2.0 Level AA.</i></p>	<ul style="list-style-type: none"> • As website evolves and improves, Hamilton CAS will incorporate WCAG 2.0 Level AA design. 	January 1, 2021	In Progress <input checked="" type="checkbox"/>
<p>Section III – Employment Standards</p>	<p>ACTION PLAN/STATUS</p>	<p>Compliance Date</p>	<p>Status</p>
<p>22. Every employer shall notify its employees and the public about the availability of accommodation for applicants with disabilities in its recruitment process</p>	<ul style="list-style-type: none"> • AODA Employment Standards Policy approved by Senior Management states our commitment to this requirement. • All internal and external job postings state the availability of accommodation for applicants with disabilities. • Applicants are reminded of the availability of accommodation when contacted for an interview. 	January 1, 2016	Completed/ Ongoing <input checked="" type="checkbox"/>
<p>23. (1) During a recruitment process, Hamilton CAS shall notify job applicants, when they are individually selected to participate in an assessment or selection process, that accommodations are available upon request in relation to the materials or processes to be used. (2) If a selected applicant requests an accommodation, the employer shall consult with the applicant and provide or arrange for the provision of a suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability</p>	<ul style="list-style-type: none"> • Incorporated into our AODA Employment Standard Policy • Part of our Accessible Formats & Communication Supports Policy 	January 1, 2016	Completed/ Ongoing <input checked="" type="checkbox"/>
<p>24. Hamilton CAS shall, when making offers of employment, notify the successful applicant of its policies for accommodating employees with disabilities.</p>	<ul style="list-style-type: none"> • AODA Employment Standards Policy. • HR Officer actively notifies successful candidates of policies. • All offers of employment have written offer of accommodation 	January 1, 2016	Completed/ Ongoing <input checked="" type="checkbox"/>
<p>25. (1) Hamilton CAS shall inform its employees of its</p>	<ul style="list-style-type: none"> • Policies are made available to all employees on Hamilton CAS intranet 	January 1,	Completed/

<p>policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p> <p>(2) Hamilton CAS shall provide the information required under this section to new employees as soon as practicable after they begin their employment.</p> <p>(3) Hamilton CAS shall provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.</p>	<p>page. Any new policies will be communicated with all staff and posted on the intranet page.</p> <ul style="list-style-type: none"> • New worker orientation goes over all policies (including Accommodation and Return to Work Policy) with new employees as well as the AODA Customer Service training on policies. • New worker orientation will include training on Ontario's Accessibility Laws and Human Rights Code as it relates to people with disabilities once developed and implemented. • Any new information regarding any changes or added information shall be communicated to all employees through the intranet. 	2016	Ongoing <input checked="" type="checkbox"/>
<p>26.1 In addition to its obligations under section 12, where an employee with a disability so requests it, Hamilton CAS shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for,</p> <p>(a) information that is needed in order to perform the employee's job; and</p> <p>(b) Information that is generally available to employees in the workplace. O. Reg. 191/11, s.26 (1).</p> <p>2. Hamilton CAS shall consult with the employee making the request in determining the suitability of an accessible format or communication support.</p>	<ul style="list-style-type: none"> • Accessible Formats and Communications Supports Policy • AODA Employment Standards Policy 	January 1, 2016	Completed/ Ongoing <input checked="" type="checkbox"/>
<p>28. (1) Hamilton CAS shall develop and have in place a written process for the development of documented individual accommodation plans for employees with disabilities.</p> <p>(2) The process for the development of documented individual accommodation plans shall include the following elements:</p> <ol style="list-style-type: none"> 1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan. 2. The means by which the employee is assessed on an individual basis. 3. 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. 4. The manner in which the employee can request 	<ul style="list-style-type: none"> • AODA Employment Standards Policy and Accommodation & Return to Work Policy • Assistive Device/Accommodation Request Form developed and implemented. • The document is filled out by employee stating the assisted device and/or accommodation they are requesting with any medical documentation provided • Each individual request is evaluated on an individual basis and each request is either approved or denied by Human Resources • If approved the employee will receive a formal letter outlining the accommodation plan, which will be reviewed every year or on an as needed basis • If denied, the reasons for the denial will be provided to the employee • All information in the document is confidential and will only be shared with the consent of the employee. • Individual accommodation plans include information regarding Hamilton CAS' commitment to providing accessible formats and/or 	January 1, 2016	Completed/ Ongoing <input checked="" type="checkbox"/>

<p>the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.</p> <p>5. The steps taken to protect the privacy of the employee's personal information.</p> <p>6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.</p> <p>7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.</p> <p>8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability</p> <p>(3) Individual accommodation plans shall,</p> <p>(a) if requested, include any information regarding accessible formats and communications supports provided, as described in section 26;</p> <p>(b) if required, include individualized workplace emergency response information, as described in section 27; and</p> <p>(c) Identify any other accommodation that is to be provided.</p>	<p>communication supports if requested.</p> <ul style="list-style-type: none"> • Human Resources – Employee Emergency Response Plan developed and to be completed on an individual basis by the employee and Human Resources, all information is kept confidential. • Human Resources – tracks and keeps list of individual Employee Emergency Response Plans, and individual accommodations 	<p>January 1, 2016</p>	<p>Completed/ Ongoing <input checked="" type="checkbox"/></p>
<p>29. (1) Hamilton CAS shall,</p> <p>(a) develop and have 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; and</p> <p>(b) Shall document the process.</p> <p>(2) The return to work process shall,</p> <p>(a) outline 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</p> <p>(b) Use individual documented accommodation plans, as described in section 28, as part of the process.</p> <p>(3) The return to work process referenced in this section does not replace or override any other return</p>	<ul style="list-style-type: none"> • Hamilton CAS has in place an Accommodation and Return to Work Policy and process for employees who have been absent from work due to a disability • Modified Work Plans developed on an individual as needed basis. 	<p>January 1, 2016</p>	<p>Completed/ Ongoing <input checked="" type="checkbox"/></p>

to work process created by or under any other statute			
<p>30.(1) Hamilton CAS shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans, when using its performance management process in respect of employees with disabilities.</p> <p>(2) In this section, - performance management means activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.</p>	<ul style="list-style-type: none"> • AODA Employment Standards policy • Hamilton CAS has updated the Performance Appraisal Policy • In modifying process Hamilton CAS shall take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans 	January 1, 2016	Completed <input checked="" type="checkbox"/>
<p>31.(1) Hamilton CAS shall take into account 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.</p> <p>(2) In this section, - career development and advancement includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.</p>	<ul style="list-style-type: none"> • AODA Employment Standards Policy. 	January 1, 2016	Completed <input checked="" type="checkbox"/>
<p>32.(1) An employer that uses redeployment shall take into account the accessibility needs of its employees with disabilities, as well as individual accommodation plans when redeploying employees with disabilities.</p> <p>(2) In this section, - redeployment means the reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.</p>	<ul style="list-style-type: none"> • AODA Employment Standards Policy 	January 1, 2016	Completed <input checked="" type="checkbox"/>
Section IV.1 – Design of Public Spaces Standard	ACTION PLAN/STATUS	Compliance Date	Status
<p>80.44 Hamilton CAS shall ensure that multi-year accessibility plans include the following:</p> <p>1. Procedures for preventative and emergency maintenance of the accessible elements in public spaces as required under this Part.</p> <p>2. Procedures for dealing with temporary disruptions</p>	<ul style="list-style-type: none"> • Maintenance Department performs routine checks of accessible spaces, both internally and externally, and provide both preventative and emergency maintenance as required (e.g. ensuring ramps are free of debris, snow removed and salted as appropriate, elevators kept in good working order, accessible washrooms mechanical devices working appropriately) 	January 1, 2014	Completed <input checked="" type="checkbox"/>

<p>when accessible elements required under this Part are not in working order.</p>	<ul style="list-style-type: none"> Procedures for temporary disruption notice as outlined in the Accessibility Standards for Customer Service policy. 		
Section IV.2 – Customer Service Standard	ACTION PLAN/STATUS	Compliance Date	Status
<p>Establishment of policies 80.46 (1) Hamilton CAS will develop, implement and maintain policies governing its provision of goods, services or facilities, as the case may be, to persons with disabilities. (2) Hamilton CAS will use reasonable efforts to ensure that the policies are consistent with the following principles:</p> <ol style="list-style-type: none"> The goods, services or facilities must be provided in a manner that respects the dignity and independence of persons with disabilities. The provision of goods, services or facilities to persons with disabilities must be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from the goods, services or facilities. Persons with disabilities must be given an opportunity equal to that given to others to obtain, use and benefit from the goods, services or facilities. When communicating with a person with a disability, the provider shall do so in a manner that takes into account the person's disability. <p>(3) The policies must deal with the use of assistive devices by persons with disabilities to obtain, use or benefit from the goods, services or facilities or with the availability of other measures, if any, which enable them to do so. (4) Hamilton CAS will prepare one or more documents describing the policies established under this section and, on request, shall give a copy of any such document to any person. (5) Hamilton CAS will notify persons to whom it</p>	<ul style="list-style-type: none"> Hamilton CAS has developed several policies and procedures as referenced above with regard to Section IV.2, including the Accessibility Standards for Customer Service policy, Use of Service Animals and Support Persons policy, Accessible Formats and Communication Supports policy, and Customer Feedback Form 	<p>January 1, 2014</p>	<p>Completed <input checked="" type="checkbox"/></p>

provides goods, services or facilities that the documents required by subsection (4) are available on request.

(6) The notice required by subsection (5) may be given by posting the information at a conspicuous place on premises owned or operated by the provider, by posting it on the provider's website, if any, or by such other method as is reasonable in the circumstances.

Use of service animals and support persons

80.47

(2) If a person with a disability is accompanied by a guide dog or other service animal, Hamilton CAS will ensure that the person is permitted to enter the premises with the animal and to keep the animal with him or her, unless the animal is otherwise excluded by law from the premises.

(3) If a service animal is excluded by law from the premises, Hamilton CAS will ensure that other measures are available to enable a person with a disability to obtain, use or benefit from the Agency's goods, services or facilities.

(4) If a person with a disability is accompanied by a support person, Hamilton CAS will ensure that both persons are permitted to enter the premises together and that the person with a disability is not prevented from having access to the support person while on the premises.

(5) Hamilton CAS may require a person with a disability to be accompanied by a support person when on the premises, but only if, after consulting with the person with a disability and considering the available evidence, Hamilton CAS determines that,

- (a) a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others on the premises; and
- (b) there is no other reasonable way to protect the health or safety of the person with a disability and the health or safety of others on the premises.

(8) Hamilton CAS will prepare one or more documents describing its policies with respect to the

<p>matters governed by this section and, on request, shall give a copy of any such document to any person.</p> <p>(9) Hamilton CAS will notify persons to whom it provides goods, services or facilities that the documents required by subsection (8) are available on request.</p> <p>(10) The notice required by subsection (9) may be given by posting the information at a conspicuous place on the premises, by posting it on the Agency's website, or by such other method as is reasonable in the circumstances.</p> <p>Notice of temporary disruptions</p> <p>80.48 (1) If, in order to obtain, use or benefit from services or facilities of the Hamilton CAS, persons with disabilities usually use other particular facilities or services of the Agency and if there is a temporary disruption in those other facilities or services in whole or in part, Hamilton CAS will give notice of the disruption to the public.</p> <p>(2) Notice of the disruption must include the reason for the disruption, its anticipated duration and a description of alternative facilities or services, if any, that are available.</p> <p>(3) Hamilton CAS will prepare a document setting out the steps that the Agency will ensure are taken in connection with a temporary disruption and, on request, shall give a copy of the document to any person.</p> <p>(4) Hamilton CAS will notify persons to whom it provides goods, services or facilities that the document required by subsection (3) is available on request.</p> <p>(5) The notices required by subsections (2) and (4) may be given by posting the information at a conspicuous place on premises, by posting it on the website, or by such other method as is reasonable in the circumstances.</p> <p>Training for staff, etc.</p> <p>80.49 (1) Hamilton CAS will ensure that the following persons receive training about the provision of goods,</p>			
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<p>services or facilities, as the case may be, to persons with disabilities:</p> <ol style="list-style-type: none"> 1. Every person who is an employee of, or a volunteer. 2. Every person who participates in developing policies. 3. Every other person who provides goods, services or facilities on behalf of Hamilton CAS. <p>(2) The training must include a review of the purposes of the Act and the requirements of this Part and instruction about the following matters:</p> <ol style="list-style-type: none"> 1. How to interact and communicate with persons with various types of disability. 2. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person. 3. How to use equipment or devices available at Hamilton CAS that may help with the provision of goods, services or facilities to a person with a disability. 4. What to do if a person with a particular type of disability is having difficulty accessing the services or facilities. <p>(3) Every person referred to in subsection (1) shall be trained as soon as practicable.</p> <p>(4) Hamilton CAS will also provide training on an ongoing basis in respect of any changes to the policies.</p> <p>(5) Hamilton CAS will keep records of the training provided under this section, including the dates on which the training is provided and the number of individuals to whom it is provided.</p> <p>(6) Hamilton CAS will,</p> <ol style="list-style-type: none"> (a) prepare a document that describes its training policy, summarizes the content of the training and specifies when the training is to be provided; and (b) on request, give a copy of the document to any person. <p>(7) Hamilton CAS will notify persons to whom it provides goods, services or facilities that the document required by subsection (6) is available on</p>			
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request.
(8) The notice required by subsection (7) may be given by posting the information at a conspicuous place on the premises, by posting it on the website, or by such other method as is reasonable in the circumstances.

Feedback process required

80.50 (1) Hamilton CAS will establish a process for receiving and responding to,
(a) feedback about the manner in which it provides goods, services or facilities to persons with disabilities; and
(b) feedback about whether the feedback process established for purposes of clause (a) complies with subsection (3).
(2) The feedback process must specify the actions that Hamilton CAS will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.
(3) Hamilton CAS will ensure that the feedback process is accessible to persons with disabilities by providing, or arranging for the provision of, accessible formats and communication supports, on request.
(4) Hamilton CAS will make information about the feedback process readily available to the public.
(5) Hamilton CAS will prepare a document describing the feedback process and, on request, shall give a copy of the document to any person.
(6) Hamilton CAS will notify persons to whom it provides goods, services or facilities that the document required by subsection (5) is available on request.
(7) The notice required by subsection (6) may be given by posting the information at a conspicuous place on the premises, by posting it on the website, or by such other method as is reasonable in the circumstances.

Format of documents

80.51 (1) If Hamilton CAS is required by this Part to give a copy of a document to a person with a

<p>disability, the Agency will, on request, provide or arrange for the provision of the document, or the information contained in the document, to the person in an accessible format or with communication support,</p> <ul style="list-style-type: none">(a) in a timely manner that takes into account the person's accessibility needs due to disability; and(b) at a cost that is no more than the regular cost charged to other persons. <p>(2) Hamilton CAS will consult with the person making the request in determining the suitability of an accessible format or communication support.</p>			
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