#### **Multi-Year Accessibility Plan**

#### **Introduction**

The Ontario government passed the Accessibility for Ontarians with Disabilities Act (AODA) in 2005. It is the goal of the government of Ontario to make Ontario accessible by 2025. Milestones Children's Centre is committed to complying with the Accessibility for Ontarians with Disabilities Act, 2005 and all the standards under it to meet the accessibility needs of persons with disabilities in a timely manner.

The regulations associated with the Integrated Accessibility Standards (hereafter referred to as the "IASR") under the AODA require that effective January 1, 2014, Milestones Children's Centre establish, implement, maintain, and document a multi-year accessibility plan which outlines the organization's strategy to prevent and remove barriers for persons with disabilities and to meet its requirements under the Act.

Under the AODA, the following accessibility standards set certain requirements that are applicable to Early Learning Centre:

- Customer Service
- Training
- Information and Communications
- Employment
- Design of Public Spaces

This multi-year plan outlines Early Learning Centre's strategy to prevent and remove barriers to address the current and future requirements of the AODA, and in order to fulfill our commitment as outlined in Early Learning Centre's Accessibility Policies.

In accordance with the requirements set out in the IASR, Early Learning Centre will:

- Post this plan on its website (www.earlylearningcentre.ca)
- Provide this plan in an accessible format, upon request.
  - Review and update this plan at least once every five years.

### **Accessible Emergency Information**

Early Learning Centre is committed to providing customers and clients with publicly available emergency information in an accessible way upon request. We will also provide employees with disabilities with individualized emergency response information when necessary.

### **Overview**

- Accessibility Standards for Customer Service
- Integrated Accessibility Standards Regulations

- 1. Emergency Procedure, Plans or Public Safety Information
- 2. Workplace Emergency Response Information
- 3. Training
- 4. Information and Communication Standards
- a. Feedback, Accessible Formats and Communication Supports
- b. Accessible Websites and Web Content
- 5. Employment Standards
- a. Recruitment
- b. Informing Employees of Supports
- c. Documented Individual Accommodation Plans/Return to Work Process
- d. Performance Management, Career Development and Redeployment

#### Accessibility Standards for Customer Service

#### **Statement of Commitment**

The Accessibility Standards for the Customer Service Regulation were created to establish accessibility standards for customer service in Ontario. In keeping with this regulation, Early Learning Centre is committed to providing respectful services that focus on the unique needs of the individual.

To achieve this, Early Learning Centre makes reasonable efforts to ensure that its policies, procedures, and practices pertaining to the provision of goods and services to the public and other third parties adhere to the following guiding principles as set out in Accessibility Standards for Customer Service: Ontario Regulation 429/07.

• We are committed to treating all people in a way that allows them to maintain their dignity and independence.

• We believe in integration and equal opportunity for all.

• We are committed to meeting the needs of people with disabilities in a timely manner and will do so by preventing and removing barriers to accessibility and meeting accessibility requirements under the Accessibility for Ontarians with Disabilities Act.

Early Learning Centre has been following the Accessible Customer Service Regulation under the AODA since January 1, 2012.

### Action Taken:

The following measures have been implemented by the Early Learning Centre:

• Ensuring all persons who, on behalf of the Early Learning Centre, deal with the public or other third parties, and all those who are involved in the development and approvals of customer service policies, practices, and procedures, as well as all others providing services to our customers, are trained to communicate and provide the best possible customer service to all customers, including persons with disabilities.

• Ensuring staff are trained and familiar with various assistive devices, on an as needed basis, that may be used by customers with disabilities who are accessing Early Learning Centre's services.

• Ensuring completion of accessibility training is tracked and recorded.

• Ensuring customers accompanied by a guide dog or other service animal in areas of the Early Learning Centre are open to the public and other third parties are accommodated.

• Ensuring that if a person with a disability is accompanied by a support person, the support person is accommodated.

• Issuing a public notice in a timely manner in the event of a planned or unexpected disruption of service or inaccessibility of facilities used by persons with disabilities. The notice must include the reason for the disruption, the anticipated duration, and a description of alternative facilities or service, if any, that may be available.

• Continuing to welcome and appreciate feedback from persons with disabilities through multiple communication methods.

# Update:

• The Early Learning Centre is committed to the ongoing of training of all staff in regard to supporting the individual needs of customers and employees with disabilities who are accessing Early Learning Centre's services or employment through the Early Learning Centre

• All training is tracked both with paper and electronic copies.

• All policies are reviewed on a regular basis and updates made to ensure compliance with Ontario Human Rights Standards and IASR regulations.

• Early Learning Centre is committed to providing an open and inclusive environment and will work with everyone to support their needs through becoming familiar with communication devices, providing opportunities to include support persons or services animals, when needed.

• Early Learning Centre ensures that any changes to our services or accessibility to our facility is communicated in a timely manner and includes all pertinent information.

Required compliance date: January 1, 2012, Status: Completed; Updates: Ongoing

### Integrated Accessibility Standards Regulation

# 1. Emergency Procedure, Plans or Public Safety Information

### Commitment:

The Early Learning Centre is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making our company premises safer for persons with disabilities during emergency circumstances.

### Action Taken:

The following measures were implemented by the Early Learning Centre effective January 1, 2012:

• Emergency procedures, plans and public safety information that are prepared by Early Learning Centre and made available to the public, will be made available in an accessible format or with appropriate communication supports, as soon as practicable, upon request.

## Update:

• Administrative personnel have attended AODA training on Accessible Word and PDF documents to meet the needs of the community and provide accessible formats when requested.

Required compliance date: January 1, 2012 Status: Completed; Updates: Ongoing

## 2. Workplace Emergency Response Information

### Commitment:

Where the Early Learning Centre is aware that an employee has a disability and that there is a need for accommodation, individualized workplace emergency response information will be provided to the employee as soon as practicable if such information is necessary given the nature of the employee's disability.

### Action Taken:

The following measures were implemented by the Early Learning Centre effective January 1, 2012:

• Where the organization becomes aware of the need to accommodate an employee's disability, and if the employee's disability is such that the individualized emergency response information is necessary, Early Learning Centre will provide individualized workplace emergency response information to the employee with the disability as soon as practicable after it becomes aware of the need.

• If an employee who receives individualized workplace emergency response information requires assistance, with the employee's consent, Early Learning Centre will provide the workplace emergency response information to the person designated by the organization to aid the employee.

• Early Learning Centre will review the individualized workplace emergency response information when:

o the employee moves to a different location in the organization.

o the employee's overall accommodation needs or plans are reviewed.

o Early Learning Centre reviews its general emergency response policies.

## Update:

• Any employee who identifies as needing a plan for support in the event of an emergency is involved in the development of their plan as well as the scheduled review of the plan.

• Any employee has the right to request an emergency response plan, should they feel that one is required.

• Any employee who requires an employee support plan for accommodation is offered an emergency response plan included if they identify that it is needed.

Required compliance date: January 1, 2012, Status: Completed; Updates: Ongoing

## 3. Training

### Commitment:

The Early Learning Centre is committed to implementing a process to ensure that all employees, volunteers, and all other persons who provide goods, services and facilities on Early Learning Centre's behalf, and persons participating in the development and approval of Early Learning Centre's policies, are provided with appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, and are provided with such training as soon as practicable.

### Planned Action:

In accordance with the IASR, Milestones Children's Centre will:

• Determine and ensure that appropriate training on the requirements of the IASR and on the Ontario Human Rights Code as it pertains to persons with disabilities, is provided to all employees, volunteers, third-party contractors who provide goods, services and facilities on Early Learning Centre's behalf, and persons participating in the development and approval of Early Learning Centre's policies.

• Ensure that the training is provided to the people referenced above as soon as practicable.

• Keep and maintain a record of the training provided, including the dates that the training was provided and the number of individuals to whom it was provided.

• Ensure that training is provided on any changes to the prescribed policies on an ongoing basis.

### Update:

• To stay current on the most recent IASR requirements, the Early Learning Centre is committed to ongoing refresher training for all staff on a cyclical basis.

• All training is documented and both paper and electronic certifications are provided.

• Any changes to prescribed policies are immediately reviewed and signed-off on by all staff.

Required compliance date: January 1, 2015 Status: Completed; Updates: Ongoing

## 4. Information and Communication Standards Commitment:

The Early Learning Centre is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making applicable company information and communications accessible to persons with disabilities.

## (a) Feedback, Accessible Formats and Communication Supports

### Planned Action:

In accordance with the IASR, Early Learning Centre will:

• Ensure that feedback processes are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications support, upon request. The organization will notify the public about the availability of accessible formats and communication support.

• Except as otherwise provided for under the IASR, provide or arrange for the provision of accessible formats and communication support upon request for persons with disabilities in a timely manner that considers the person's accessibility needs.

• Consult with the person making the request in determining the suitability of an accessible format or communication support.

• Notify the public about the availability of accessible formats and communication support.

### Update:

• The Early Learning Centre is committed to ensuring that feedback processes are accessible to persons with disabilities.

• Administrative personnel have attended AODA training on Accessible Word and PDF documents to meet the needs of the community and provide accessible formats when requested.

• The Early Learning Centre is committed to providing an inclusive environment where individual needs are met through consultation with any person who requires accessible formats and communication support.

Required compliance date:

January 1, 2015 – Feedback-related provisions January 1, 2016 – Accessible formats & Communication Supports Status: Completed; Updates: Ongoing

## (b) Accessible Websites and Web Content Planned Action:

In accordance with the IASR, Early Learning Centre will ensure that the organization's public websites and online content conform with the World Wide Web Consortium Web Content Accessibility Guidelines (WCAG) 2.0, Level A (new websites and online content) by January 1, 2014, to Level AA for all content by January 1, 2021.

## Update:

• During our new website construction, our web designer was aware of compliance regulations regarding accessibility of content. Early Learning Centre continues to work closely with the web designer to ensure ongoing compliance.

Required compliance date: January 1, 2014 – WCAG 2.0 Level A – new Internet websites and web content, January 1, 2021 – WCG 2.0 Level AA – all Internet websites and web content, except for exclusions set out in the IASR. Status: Completed; Updates: Ongoing

### 5. Employment Standards

# (a) Recruitment

### Commitment:

The Early Learning Centre is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of making the recruitment process accessible to persons with disabilities.

### Planned Action:

In accordance with the IASR, Early Learning Centre will do the following:

### **Recruitment General**

The Early Learning Centre will notify employees and the public of the availability of accommodation for applicants with disabilities in the recruitment process. This will include:

• A review and, as necessary, modification of existing recruitment policies, procedures, processes, and templates.

• Specifying that accommodation is available for applicants with disabilities, on the Early Learning Centre's website and job postings.

### **Recruitment, Assessment and Selection**

The Early Learning Centre will 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 in the assessment/selection process.

## This will include:

• A review and, as necessary, modification of existing recruitment policies, procedures, processes, and templates.

• Inclusion of availability of accommodation notice as part of the script in the scheduling of an interview and/or assessment.

• If a selected applicant requests accommodation, consult with the applicant and arrange for the provision of suitable accommodation in a manner that considers the applicant's accessibility needs due to disability.

## Notice to Successful Applicants

When making offers of employment, the Early Learning Centre will notify the successful applicant of its policies for accommodating employees with disabilities. This will include:

• A review and, as necessary, modification of existing recruitment policies, procedures, processes, and templates.

• Inclusion of notification of Early Learning Centre's policies on accommodating employees with disabilities in offer of employment letters.

# Update:

• All communication with potential applicants includes a statement of accessibility and the availability of accommodation at any point throughout the application, interview and/or hiring process.

• All interviewees are made aware, verbally, during the opening of the interview that the Early Learning Centre is an Accessible Employer and, as such, will provide accommodation as needed and if requested throughout the interview process.

• Early Learning Centre provides all policies regarding Accessibility to all successful applicants with the offer of employment as well as providing training on all IASR required sections.

Required compliance date: January 1, 2016 Status: Completed; Updates: Ongoing

# (b) Employee Supports

### Commitment:

The Early Learning Centre is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of informing employees of available accessibility supports.

### Planned Action:

In accordance with the IASR, the Early Learning Centre will:

• Inform its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodation that consider an employee's accessibility needs due to disability.

• Provide the information required to new employees as soon as practicable after they begin their employment.

• Provide updated information to its employees whenever there is a change to existing policies on the provision of job accommodation that consider an employee's accessibility needs due to disability.

• Where an employee with a disability requests it, consult with the employee to provide, or arrange for the provision of accessible formats and communication supports for:

o Information that is needed to perform the employee's job; and

o Information that is generally available to employees in the workplace.

o Early Learning Centre will consult with the employee making the request in

determining the suitability of an accessible format or communication support.

## Update:

• Early Learning Centre provides a copy of all policies related to Accessibility to all new employees upon the date of hire as well as providing updates to policies on an as required basis.

• The Early Learning Centre is committed to ongoing review of policies to ensure compliance with legislation in relation to IASR requirements.

• Ensure all employees are aware that an accommodation plan can be made available to them, developed in consultation with the employee, should they ever require it.

• Administrative personnel have attended AODA training on Accessible Word and PDF documents to meet the needs of the community and provide accessible formats when requested.

Required compliance date: January 1, 2016 Status: Completed; Updates: Ongoing

### c) Documented Individual Accommodation Plans/Return to Work Process

### Commitment:

The Early Learning Centre is committed to complying with the provisions of the AODA in respect of this requirement, with the objective of improving accommodation and return to work processes in the workplace.

### Planned Action:

Early Learning Centre's is committed to developing a policy to provide accommodation, within all reasonable limits, for any employee (new or existing) with a disability to be able to perform the tasks as required for their position. Also, the Early Learning Centre will review and update, on an ongoing basis, current policies relating to facilitating an employee's return to work after absenteeism due to disability.

Early Learning Centre will review and assess the existing policies to ensure that they include a process for the development of documented individual accommodation plans for employees with a disability if such plans are required.

Early Learning Centre will ensure that the process for the development of documented individual accommodation plans includes the following elements:

• The way an employee requesting accommodation can participate in the development of the individual accommodation plan.

• The means by which the employee is assessed on an individual basis.

• The way the Early Learning Centre can request an evaluation by an outside medical or other expert, at the Early Learning Centre's expense, to assist the organization in determining if accommodation can be achieved and, if so, how accommodation can be achieved.

• The way the employee can request the participation of a representative from the workplace in the development of the accommodation plan.

- The steps taken to protect the privacy of the employee's personal information.
- The frequency with which the individual accommodation plan will be reviewed and updated and the way it will be done.

• If an individual accommodation plan is denied, the reason for the denial will be provided to the employee.

• The means of providing the individual accommodation plan in a format that considers the employee's accessibility needs due to disability.

#### Individual accommodation plans will:

• If requested, include any information regarding accessible formats and communications support provided, as required in the Standard.

• If required, include individualized workplace emergency response information, as required in the Standard; and

• Identify any other accommodation that is to be provided.

Early Learning Centre will ensure that the return-to-work process as set out in its existing policies outlines the steps the Early Learning Centre will take to facilitate the employee's return to work after a disability-related absence, outlines the development of a written individualized return to work plan for such employees, and requires the use of individual accommodation plans, as discussed above, in the return to work process.

## Update:

• Early Learning Centre has comprehensive policies related to the return to work process as well individual accommodation plans.

• Early Learning Centre has developed a multi-step, supportive and collaborative process for the development and documentation of accommodation needs by way of an individualized plan, when required. The plan is also inclusive of an agreed upon follow-up and review process.

Required compliance date: January 1, 2016 Status: Completed; Updates: Ongoing

# (c) Performance Management, Career Development and Redeployment

## Commitment:

Early Learning Centre will consider 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.

• When providing career development and advancement to its employees with disabilities.

• When redeploying employees with disabilities.

### Planned Action:

In accordance with the IASR, Early Learning Centre will:

• Review, assess and, as necessary, modify existing policies, procedures, practices and templates to ensure compliance with the IASR.

• Take the accessibility needs of employees with disabilities and, as applicable, their individualized accommodation plans, into account when:

- o Assessing performance
- o Managing career development and advancement
- o Redeployment is required

### Update:

• Administrative personnel have attended AODA training on Accessible Word and PDF documents to meet the needs of the community and provide accessible formats when requested.

• Early Learning Centre employees are made aware that accommodation and/or required equipment that may be needed to remove barriers to success will be provided by the organization.

Required compliance date: January 1, 2016 Status: Completed; Updates: Ongoing

### **Design of Public Spaces**

### Commitment:

Early Learning Centre will meet the Accessibility Standards for the Design of Public Spaces when building or making major modifications to applicable public spaces. Public spaces include:

- Recreational trails/beach access routes
- Outdoor public eating areas like rest stops or picnic areas
- Outdoor play spaces, like playgrounds in provincial parks and local communities
- Outdoor paths of travel, like sidewalks, ramps, stairs, curb ramps, rest areas and accessible pedestrian signals
- Accessible off-street parking
- Service-related elements like service counters, fixed queuing lines and waiting areas

In the event of a service disruption due to the modification or redesign of a public space, the Early Learning Centre will notify the public of the service disruption and alternatives available.

### For More Information:

For more information on this accessibility plan, please contact: Michelle Good, Executive Director, Early Learning Centre Phone: 519-631-7018 ext. 106 Email: michelle.good@earlylearningcentre.ca

Accessible formats of this document are available free upon request.