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Section 1: General

1.1 Policy

Independent Living Centre of Waterloo Region (ILCWR) is committed to providing services in a way that respects the dignity and independence of consumers, community members and employees with disabilities.

1.2 Purpose and application

The Accessibility for Ontarians with Disabilities Act, 2005 (AODA) is provincial legislation with the purpose of developing, implementing and enforcing standards to achieve an accessible Ontario by the year 2025. This policy addresses the Integrated Standard of the AODA which includes: Accessible Customer Service, Accessible Information and Communication as well as Accessible Employment.

Note: The requirements listed here do not replace requirements under the Human Rights Code, nor do the standards limit any obligations owed persons with disabilities under any other legislation.

1.3 Establishment of accessibility policies and plans

ILCWR is obligated to develop, implement and maintain policies governing how accessibility will be achieved within the organization. This document states a long-term accessibility plan, which outlines strategies to prevent and remove barriers. All strategies meet the requirements of the AODA.

1.4 Training

ILCWR staff, volunteers and all other persons who provide goods, services

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and facilities on behalf of the organization must be trained on the ILCWR accessibility plan. This training may take place in person, online or in a written handout. Employees, volunteers and all other affiliates will be notified if any changes are made to this policy or the accessibility plan.

1.5 Report Filing

ILCWR must file accessibility reports under section 14 of the Act with respect to the accessibility standards in the AODA.

Section 2: Accessible Customer Service

Definitions

For the purposes of this policy **communication** refers to the interactive process between two people or systems. This interaction may take place in person, by email, fax, TTY, Bell Replay Services, the ILCWR website, mail or telephone.

For the purposes of this policy, **assistive devices** are defined as any piece of equipment or product that is used to increase, maintain, or improve functional capabilities of persons with disabilities.

For the purposes of this policy, a **service animal** is defined as either:

1. A 'guide dog' as defined in section 1 of the Blind Persons Rights' Act, R.S.O. 1990, c.B.7; or
2. An animal used by a person with a disability, including but not limited to a dog, if:
 - a. It is readily apparent that such animal is used by the handler for reasons related to his or her disability (i.e. dog wearing harness); or
 - b. If the person provides a letter from a medical professional confirming

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that the person requires such animal for reasons relating to his or her disability; or

c. If the handler provides identification from the service animal training school

For the purpose of this policy, a **support person** is defined as a person who accompanies someone with a disability to assist with communication, mobility, personal care, medical needs or with access to goods or services. A support person may be a paid professional, a volunteer, a family member or friend.

For the purposes of this policy, a **service disruption** is defined as planned or unplanned unavailability of facilities or services operated by ILCWR including but not limited to washroom facilities, elevators and websites.

2.1 Requirements

The Accessible Customer Service Standard of the AODA requires every provider of goods and services to establish policies, practices and procedures governing the provision of its goods and services to persons with disabilities.

2.2 Policy Statement

The Independent Living Centre of Waterloo Region (ILCWR) is committed to inclusion and is devoted to providing goods and services that are accessible to all.

ILCWR will meet the needs of people with disabilities in a manner that:

- is free from discrimination;
- provides an opportunity equitable in relation to the broader public with respect to the use and benefit of goods, services, programs and

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facilities;

- protects the dignity and independence of all people and;
- strives to provide leadership and education to employees, volunteers and necessary contractors through training and development in matters of accessibility

2.3 Commitment

ILCWR will ensure that policies, practices and procedures regarding customer service are inclusive and accessible. This will include providing goods or services to people with disabilities and guaranteeing that they are consistent with the core principles of the AODA's Customer Service Regulations: dignity, independence, integration and equal opportunity. The core principles of the AODA mirror those of the Independent Living Centre of Waterloo Region.

2.4 Providing Goods and Services to people with disabilities

ILCWR is committed to excellence in serving consumers and the general public in a manner that considers the varying needs and abilities of persons with disabilities. This commitment includes:

a) Communication

When communicating with a person with a disability, employees will do so in a manner that takes into account that person's ability. The individual with a disability may request an accommodation and/or alternate formats to facilitate their interaction with the organization. All employees and volunteers will work with the individual to provide a timely and appropriate accommodation and/or alternate format.

Note: Alternative formats are available upon request only. ILCWR will ask in

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advance of meetings or events if accommodations are required.

b) Assistive Devices

ILCWR is committed to serving people with disabilities who use assistive devices to obtain, use or benefit from our services. All staff will be trained and familiar with various assistive devices that may be used by people accessing our services.

ILCWR employees must know how to use the assistive devices in their workplace. In other words, Head Office staff will be trained on the assistive devices available at Head Office. Staff working at the Assisted Living Sites will be trained on the devices available in their workplace. Below are examples of assistive devices that are available:

- hands-free doors
- hands-free elevator
- hands-free phone
- TTY
- Bell Relay Service
- Process for ordering alternative formats

2.5 Use of Service Animals

ILCWR welcomes people with disabilities who are accompanied by a service animal on the parts of our premises that are open to the public and other third parties.

While ILCWR will take the use of service animals in good faith, if it is not readily apparent that the animal is a service animal, proof (accepted forms of proof are listed in the definition section) may be requested.

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It is the responsibility of the handler to ensure that his or her service animal is kept in control at all times. However, should a service animal be excluded due to another law or special circumstance, ILCWR will arrange alternative accommodations around providing service to the person who uses the service animal as well as the animal itself.

2.6 Use of Support Persons

ILCWR welcomes people with disabilities who are accompanied by a support person. At no time will a person with a disability be prevented from having access to his or her support person while on our premises.

If, in the presence of a support person, personal information is being discussed, employees must ensure that the individual consents to the support person being present. Consent can be given verbally or in writing.

Fees will not be charged for a support person to attend most ILCWR events. On occasions where ILCWR consumers must pay to attend a dinner, seminar or event and the support person is joining as a *guest* and participating or dining then a fee may be charged.

2.7 Notice of temporary disruption

ILCWR will provide the public with notice in the event of a planned or unexpected disruption in the facilities or services typically used by people with disabilities. This notice will be available in a variety of formats and will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

If there is ample warning of the disruption, the notice will be placed at all public entrances and service counters on the premises. It will also be recorded on the outgoing telephone message and/or website. In the event

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that the disruption is unplanned, ILCWR will give as much notice as possible. This may not include a phone or website message.

2.8 Employee Training

ILCWR will provide Accessible Customer Service training to:

- head office staff
- leadership team
- supervisors
- attendants
- volunteers
- board of directors
- consultants

Training will also be provided to third party contractors who act on behalf of the centre.

Training will occur during new hire's mandatory orientation at the commencement of their duties. Ongoing and updated training will be provided by way of handouts, workshops, refresher training or online (e.g. through ILCWR website).

Training will include but is not limited to: the purpose of the act, how to communicate effectively with persons with disabilities, working with service animals, ILCWR's policies and procedures around accessibility and inclusion.

Applicable staff will be trained on policies, practices and procedures that affect the way goods and services are provided to people with disabilities. Employees will also be updated when changes are made to these policies, practices and procedures.

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2.9 Procurement

Whenever possible, ILCWR will take into account the accessibility features and criteria of goods, services, and facilities procured, purchased, or acquired outside of the organization. When it is not practicable to do so, ILCWR shall provide, upon request an explanation.

2.10 Feedback process

ILCWR values feedback from the community. Any comments or complaints will be directed to the Community Relations Coordinator. A response will be provided within 10 business days in the format in which the feedback was given. The reply will outline the actions taken to resolve the concern, if any.

Feedback regarding the manner in which ILCWR provides service to persons with disabilities may be submitted by telephone, in writing, in an electronic format, through TTY, in person or other methods.

Feedback procedure and forms are available on the ILCWR website.

Section 3: Accessible Information and Communication

Definitions

For the purposes of this policy, **plain language** refers to clear, straightforward expression, using only as many words as are necessary. It is language that avoids complicated wording and sentence structure. Plain language documents are shorter and easier to read.

For the purposes of this policy, **Information** refers to data, facts, knowledge and subject matter that may exist in any format such as text (e.g. annual report), numbers (e.g. budgets), image (e.g. advertising) or sound (e.g.

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outgoing voice mail) that convey meaning.

For the purposes of this policy, **communication** refers to the interactive process between two people or systems where information is provided (e.g. website), sent (e.g. mail out) or received (e.g. emails).

For the purposes of this policy, **Accessible Information and Communication** refers to the consideration of accessibility and ability levels when planning reports, emails, advertising etc. This includes giving people with disabilities adequate time to process and reply to information provided. ILCWR will provide everyone with the same quality of information/communication and within a reasonable timeframe.

For the purposes of this policy, **alternative formats** refers to making use of formats other than standard print (e.g. audio version, large print, Braille, electronic version) to change the way information and material is presented to meet an individual's learning style needs and ability.

For the purposes of this policy, **Communication Services** include the services of qualified American Sign Language (ASL) interpreters, intervenors, captioners and note-takers.

For the purposes of this policy, an **Intervenor** is a person who provides communication assistance to an individual who is deafblind. An Intervenor mediates between the person who is deafblind and his or her environment and acts as the eyes and ears of the person with deafblindness usually through hands-on interpreting.

For the purposes of this policy, a **captioner** is a person who displays text of the spoken word onto a screen for people who are hard of hearing or deaf to read. This can be done on or offsite, in real time or pre-recorded.

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For the purposes of this policy, an **Interpreter** is a person who listens to speech and repeats it back to persons who are deaf or hard of hearing via sign language interpreting, oral mouthing, cued speech transliteration.

3.1 Statement of Commitment

ILCWR is committed to providing information and communication supports, services, resources, products, practices and systems that are consistent with the requirements of the Information and Communication Standard of the AODA.

To ensure that all information and communication is accessible and inclusive ILCWR will follow the standards stated in this document. ILCWR will consider the values of the organization when preparing any information or communication: justice, dignity and teamwork.

3.2 Plain Language

ILCWR will make every effort to ensure that all information and communication is accessible and inclusive. When possible, documents created for public review will be written taking the principles of plain language into account. This includes policies, forms and manuals. In the event that it is not possible to create a document in plain language (e.g. a policy with technical language) a separate plain language version will be provided upon request.

Plain language documents:

- use familiar words
- use personal pronouns
- use an active voice
- avoid unnecessary qualifiers and multiple negatives
- leave plenty of white space on the page

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- use large accessible font with even larger headings
- include visuals where appropriate
- are as short as possible and well organized

3.3 Alternative Formats

Alternative formats for all ILCWR public documents will be available upon request.

a) Timeline

ILCWR will provide information in an appropriate format within a reasonable timeframe.

b) Cost

Where possible, ILCWR will prepare alternative formats in-house. In the event that we must hire outside of the agency, ILCWR will cover the cost for this service. If there is a fee for a document there will be no additional fee for an alternative format.

c) Communication Service Requests

When an ILCWR consumer or member of the public requests an ASL interpreter, captioner or note-taker, for an ILCWR meeting or event, ILCWR will arrange for the services at no cost to the consumer or community member. It is assumed if someone requires an intervenor that they will bring their own staff person, however, in the event that this is not the case, ILCWR will contact Canadian Hearing Society to make arrangements.

3.4 Notification and Feedback

a) Duty to Notify

ILCWR will notify members of the public about the availability of accessible information and communications using a variety of measures including: a sign

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at reception or on the front door, a notice on printed documents and on the ILCWR website.

b) Feedback

ILCWR has a feedback process available to the public with regards to accessible Information/Communication practices.

Feedback and complaint processes shall permit people to identify their communication needs and to do so using alternative formats, communication supports and services when necessary.

There is a comment and complaint form available on the ILCWR website. All feedback will be directed to the Community Relations Coordinator. Responses will be received within 10 business days in the same format in which the feedback was received.

Section 4: ILCWR's Information and Communication Plan

Definitions

For the purpose of this policy, **multimedia** refers to the combination of text, sound, and/or motion video. In this context it refers most specifically to Microsoft PowerPoint presentations.

For the purpose of this policy, **alternative text** refers to text that appears when you move your pointer over a picture or object. This helps people using screen readers understand the content of image and tables in your presentation.

4.1 Electronic Information and Communication

All electronic information and communication will be accessible in terms of writing style, font and point size. This pertains to both internal and external:

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emails, brochures, newsletters, excel documents and other publications.

a) Email

All Head Office and Assisted Living Site Supervisor's will set their email font default to a minimum of Arial 14, Verdana 12 or Tahoma 12. Email signatures will be set to above listed font options and will include job title, organization, contact information and will include the tag line "Helping people with disabilities achieve independence since 1982".

b) Word and Excel Documents

The default font for Word and Excel documents will be either: Arial 14, Verdana 12 or Tahoma 12. These point sizes are a minimum requirement.

c) ILCWR website

ILCWR's redesigned website will meet the web content accessibility guidelines from the Web Content Accessibility Guidelines (WCAG) 2.0 and will incorporate the elements of plain language listed above.

d) Multimedia presentations

All multi-media presentations must:

- avoid templates with busy patterns
- use a standard layout
- consist of black text on a white screen in the above listed approved fonts
- use consistent fonts throughout the presentation
- use a point size of 44 for headings (may be bolded)
- use a minimum point size of 24 for the text in the body of the slide
- offer a strong contrast when using coloured text (e.g. dark red on white)

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- not use color as the only way to convey content (i.e. when listing items on a slide, instead of making the priority item red, add an arrow beside the red text)
- limit the amount of information on each slide (no more than 10 lines)
- avoid long sentences and paragraphs (bullet points are best)
- offer enough white space when images are used
- use simple transitions when changing slides, so they do not distract from the content
- be written in plain/ clear language
- add alternative text to images and objects. This pertains only to slides that will be viewed individually not in a group setting where slides are discussed by presenter

4.2 Printed Documents

All printed documents will be accessible in terms of writing style, font and point size. Changes to printed documents include:

a) Document font and point size

All ILCWR documents must be written in a minimum of Arial 14, Verdana 12 or Tahoma 12.

b) Handouts

All ILCWR brochures, reports and other handouts must be written in a minimum of Arial 14, Verdana 12 or Tahoma 12 and incorporate elements of plain language listed above.

c) Business cards

All business cards will be redesigned to include larger, more accessible font.

d) Letterhead

ILCWR electronic and hard copy letterhead will utilize space more

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appropriately to increase font size.

4.3 Emergency and Public Safety Information

a) For the Public

In all ILCWR public spaces, accessible information regarding evacuation procedures and information about building alarms will be provided. This will also include information about incidents that threaten life, property, operations or the environment and any related procedures.

b) For employees

ILCWR shall provide accessible emergency and public safety information to all staff. This will include workplace evacuation procedures and information about building alarms, workplace health and safety, and plans for addressing incidents that threaten life, property, operations or the environment and related procedures.

4.4 Notification of Alternative Formats

All emergency and safety information is available in alternative formats when requested.

4.5 Training Staff

Head office staff and supervisors will be trained in person on the Accessible Information and Communication Standard and ILCWR's accessible information and communication plan. All other employees including attendants and volunteers will be given the information in written format. There may be other learning opportunities through staff meetings or other measures.

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Section 5: Accessible Employment

Definitions

For the purposes of this policy, **Performance management** refers to activities related to assessing and improving employee performance, productivity and effectiveness, with the goal of facilitating employee success.

For the purposes of this policy, **career development and advancement** includes providing additional responsibilities to an employee's current position, the movement of an employee from one job to another, providing greater responsibility or moving to a higher level within the organization. Employee movement is based on merit, seniority, or a combination of both.

For the purposes of this policy, **Redeployment** refers to 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.

5.1 Statement of Commitment

ILCWR is committed to being an inclusive and accessible workplace for all employees, volunteers and third party contactors. While we strive to carry out processes outlined below for all ILCWR stakeholders, this section applies only to paid employees.

5.2 Recruitment and Selection Process

- a) ILCWR will notify employees and the public about the availability of accommodations for applicants with disabilities during the recruitment process.

- c) ILCWR will notify job applicants when they are individually selected to

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participate in an assessment or selection process that accommodations are available upon request in relation to the process and/or materials to be used.

- d) If accommodations are requested, ILCWR will consult with the applicant and provide or arrange for suitable accommodations.
- e) When making an offer of employment, ILCWR will notify the successful applicants of its policies for accommodating staff with disabilities.

5.3 Communication Supports and Accessible Formats for Employees

- a) ILCWR will inform employees of policies used to support employees with disabilities, including but not limited to, policies on the provision of job accommodations.
- b) ILCWR will provide the information required under this section to new employees as soon as practicable after they begin their employment.
- c) Updated information will be provided whenever there is a change to existing policies on the provision of job accommodations.

When an employee with a disability requests it, ILCWR in consultation with the employee, will provide or arrange for the provision of accessible formats and communication supports for:

1. Information that is needed in order to perform the employee's job and;
2. Information that is generally available to employees in the workplace.

ILCWR shall consult with the employee making the request to determine the suitability of an accessible format or communication support.

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5.4 Workplace Emergency Response Information

With the employees consent, ILCWR will provide individualized workplace emergency response information for employees who have a disability and require individualized accommodation. These plans will be made in consultation with the employee. ILCWR will provide the information required under this section as soon as practicable after the request for accommodation is made.

ILCWR shall review the individualized workplace emergency response information:

- a) When the employee moves to a different location within the organization
- b) When the employee's overall accommodation needs or plans are reviewed; and
- c) When ILCWR reviews its general emergency response policies

5.5 Documented Individual Accommodation Plans

ILCWR strives to create an inclusive and accessible workplace; however, individualized accommodation plans for employees with disabilities will still be necessary. There is a written process in place for individualized accommodation plans for employees with disabilities. This process includes the following elements:

- a) The manner in which an employee requesting accommodation can participate in the development of their accommodation plan
- b) The means by which the employee is assessed on an individual basis
- c) The manner in which ILCWR can request the participation of a representative either internal or external to ILCWR

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- d) The steps taken to protect the privacy of the employee's personal information
- e) The frequency with which the plan will be reviewed and updated and the manner in which it will be done
- f) If an individual accommodation plan is denied, the reasons for the denial will be provided to the employee
- g) The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs

In the circumstance of significant and long term disability, an outside medical (or other) expert may be consulted to assist with the accommodation plans. This process would take place for paid employees only after exhausting internal resources. ILCWR will cover the cost of outside experts to assist with accommodation plans; however, the decision to do so is at the discretion of the ILCWR.

Notes such as, *Return to Work* or *Fitness for Duty*, which are requested on a regular basis, remain at the expense of employees.

Individual accommodation plans shall:

- a) include any information regarding accessible formats and communication supports provided
- b) include individualized workplace emergency response information
- c) identify any other accommodations required for the employee to function in the workplace

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5.6 Return to Work Process

ILCWR has in place a return to work process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work. This process, as described above, outlines the steps ILCWR will take to facilitate the return to work of the employee.

Note: the return to work process referenced here does not replace or override any other return to work process created by or under any other statute.

For work-related injuries see ILCWR's Return to Work Policy (12.1)

5.7 Performance Management

When ILCWR uses performance management to assess employees, the accessibility needs of employees with disabilities, as well as individual accommodation plans, will be taken into account.

5.8 Career development and Advancement

When ILCWR provides career development and advancement to employees, the accessibility needs of employees with disabilities as well as any accommodation plans will be taken into account.

5.9 Redeployment

When ILCWR uses redeployment, the accessibility needs of employees with disabilities, as well as individual accommodation plans will be taken into account.

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Section 6: Design of Public Spaces

Definitions

For the purposes of this policy, **Redevelopment** refers to any significant and planned changes to a public space.

6.1 Statement of Commitment

ILCWR is committed to creating accessible and inclusive public spaces.

6.2 Implementation

ILCWR must make all new constructions and redeveloped existing spaces accessible. ILCWR is **not** required to retrofit existing spaces and this legislation does **not** refer to ongoing maintenance of spaces.

The Design of Public Spaces Standard under the AODA covers 7 areas:

1. Accessible Parking
2. Exterior paths of travel
3. Service-related elements
4. Outdoor public-use eating areas
5. Maintenance of spaces
6. Recreational trails and beach access routes
7. Outdoor play spaces

To review the specific requirements of the above accessibility features please reference Accessibility of Ontarians with Disabilities Act (AODA), 2005.

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Section 7: Responsibilities

This policy was produced in accordance with the Accessibility For Ontarians With Disabilities Act (AODA), 2005.

6.1 Modifications to this or other policies

ILCWR is dedicated to inclusion and pledges to provide services that respect and promote the dignity and independence of all people. ILCWR's accessibility plans will be reviewed at least once every five years. However, no changes will be made to this policy before considering the impact on people with disabilities.

6.2 Accountability

These policies and accessibility plans are available to the public and are available in alternative formats upon request.

6.3 Questions about this policy

Any questions or concerns regarding this policy can be directed to the Community Relations Coordinator.