

PHARA

Independence and Housing
Autonomie et logement

Multi-Year Accessibility Plan

Accessibility for Ontarians with Disabilities Act

Statement of Commitment - Accessibility

PHARA is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

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DEFINITIONS:

Accessible Formats – formats that may include, but are not limited to, large print, recorded audio, electronic formats, braille and other formats useable by persons with disabilities.

AODA – Accessibility for Ontarians with Disabilities Act

Assistive Device – a technical aid, communication device or medical aid that is used to increase, maintain or improve the functional abilities of people with disabilities. Assistive devices include, but are not limited to; wheelchairs, walkers, canes, oxygen tanks, hearing aids, etc.

Barriers – anything that prevents a person with a disability from fully participating in all aspects of society. Can be physical, architectural, information and communications, attitudinal, or technological and organizational barriers

- Physical and Architectural barriers are features of buildings or spaces that cause problems for persons with disabilities
- Information and Communication barriers arise when a person cannot easily understand information
- Attitudinal barriers are those assumptions and actions that discriminate against persons with disabilities
- Technological barriers occur when a technology is not designed to support various assistive devices
- Organizational barriers are an organization's policies, practices or procedures that discriminate against people with disabilities

Communications – the interaction between two or more people or entities, or any combination of them, where information is provided, sent or received.

Communications Supports – communication supports may include, but are not limited to: captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communication.

Dignity – service is provided in a way that allows the person with a disability to maintain self-respect and receive respect from others

Disability – 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 impairment, deafness or hearing impediment, muteness or speech impediment, or physical reliance of a guide dog or other animal or on a wheelchair or other remedial appliance or device.

- A condition of mental impairment or 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

- An injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*

Information – data, facts and knowledge that exist in any format, including: text, audio. Digital or images that conveys meaning

Equal Opportunity – service is provided to a person with a disability in such a way that they can access goods and services equal to that given to others

Guide Dog – a guide dog as defined in the *Blind Persons Rights Act*: a dog trained as a guide for a blind person, having qualifications prescribed by the Regulations.

IASR – Integrated Accessibility Standards Regulation.

Independence – when a person with a disability is able to do things on their own without unnecessary assistance or interference from others

Integration – service is provided in a way that allows persons with disabilities to benefit from the same services, in the same place and in the same or similar manner as other customers unless an alternate measure is necessary to enable a person with a disability to access goods and services.

Service Animal – an animal used by a person with a disability where it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Support Person – in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care or medical needs or with access to goods or services.

Unconvertible – information or communications that are unconvertible due to the infeasibility of converting the information or communications.

Undue Hardship – The Ontario Human Rights Code considers 3 things when determining whether an accommodation would cause undue hardship

1. Cost – are the costs “so substantial that they would alter the essential nature of the enterprise, or so significant that they would substantially affect its viability”
2. Outside sources of funding, if any – “Before being able to claim that it would be an undue hardship based on costs to accommodate someone with a psychological disability, and organization would have to show that they took advantage of any available government funding (or other) program to help with such costs”
3. Health and Safety – “If an accommodation is likely to cause significant health and safety risks, this could be considered ‘undue hardship’”

THE ACCESSIBILITY FOR ONTARIANS WITH DISABILITIES ACT:

In 2005, the Ontario Government passed the *Accessibility for Ontarians with Disabilities Act (AODA)* with the goal of making Ontario fully accessible in all aspects of daily living by January 2025. The goal is to achieve this by developing, implementing and enforcing accessibility standards regarding goods, services, facilities, information, accommodation, employment, buildings, structures and premises. To date the AODA includes *Ontario Regulation 429/07 (Accessibility Standards for Customer Service)* and *Ontario Regulation 191/11 (Integrated Accessibility Standards)*

These standards have been combined into a single regulation called the *Integrated Accessibility Standards Regulation (IASR)*. The IASR became law on July 1st, 2011 and it addresses customer service, information, employment, transportation, and buildings and structures.

This Multi-Year Accessibility Plan addresses the standards that are set out in the IASR, which in turn, addresses the requirements set out in *Ontario Regulations 429/07 and 191/11*.

REVIEW AND DUE DATES

The AODA requires an accessibility compliance report be filed every two years with the Government of Ontario with the next report to be filed in 2023. PHARA is in compliance with the filing of these reports. PHARA will review this plan within the legislated time period and it will be approved by the Board of Directors. . PHARA will also make the appropriate changes to this accessibility plan when there is legislative or policy changes that affect the requirements as set by the AODA and the IASR.

Each specific requirement as set by the IASR has a due date by which organizations are required to meet compliance standards. The Multi-Year Plan outlined below not only indicates PHARA's compliance status but also the due date by which compliance was to be met.

PHARA's Multi-Year Accessibility Plan outlines the organization's priorities for accessibility which align with the organization's Mission, Philosophy and Aims.

MISSION:

PHARA provides services in both official languages to people with disabilities and seniors as well as housing opportunities for those with low to moderate incomes.

PHILOSOPHY:

The philosophy of the Physically Handicapped Adult's Rehabilitation Association evolves from the realization that disabled citizens are entitled to shape their own lives and actualize their potential and to utilize services made available to them.

AIMS:

PHARA aims to provide services and advocacy to disabled persons and seniors, who assume responsibility of self-direction and integration in society.

Statement of Commitment - Accessibility

PHARA is committed to ensuring equal access and participation for people with disabilities. We are committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

We believe in integration, and we are committed to meeting the needs of people with disabilities in a timely manner. We will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

PART 1: CUSTOMER SERVICE

Ontario Regulation 191/11

Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
80.46	Establishment of Policies, Practices and Procedures	Develop and implement policies, practices and procedures that govern the provision of goods and services to persons with disabilities. Have a document of such policies, practices and procedures available to the public upon request	PHARA has developed a Customer Service guide that will be made available to all staff. This guide will also be made available to any individual who requests it. The Customer Service Guide can be found in the Appendices of this document. COMPLIANT	Jan 1, 2012	Sept 27 th , 2018
80.47	Use of Service Animals and Support Persons	Ensure persons with services animals or persons accompanied by a support person are permitted to enter the premises. Have a document describing the policies, practices and procedures with respect to service animals and support persons.	Use of service animals and support persons is addressed in PHARA Policy AD-03 which is was approved by the Board of Directors on May 31 st 2018 The process describing the procedures regarding serving customers/clients with service animals and support persons is outlined in the Customer Service Guide. COMPLIANT	Jan 1, 2012	Sept 27 th , 2018
80.48	Notice of Temporary Disruptions	Post a notice of temporary disruption to the public. Include the reason for disruption, anticipated disruption duration and a	The process and procedures for addressing service disruptions on PHARA premises is outlined in the Customer Service Guide; including a list of the locations where disruption notices will be placed.	Jan 1, 2012	Ongoing

		description of alternative facilities that are available.	ONGOING		
Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
80.49	Training for Staff	Ensure that every person that deals with the public receives training on how to interact with persons with various disabilities, and what to do if a person with a disability is having difficulty accessing goods/services	<p>Training for staff is addressed in PHARA Policy AD-03 which was approved by the Board of Directors on May 31st 2018.</p> <p>The procedures concerning training and training documentation is included in the customer service guide along with a list of what is included in terms of AODA training.</p> <p>COMPLIANT</p>	Jan 1, 2012	July 13 th 2018
80.50	Feedback Processes for Providers of Goods and Services	Establish a process for receiving and responding to feedback. Create a document that outlines this process and specifies the actions what will be taken if a complaint is received.	<p>PHARA has developed a feedback process that is outlined in the Customer Service Standard Guide.</p> <p>A blank version of our customer feedback form can be found in the appendices of this document.</p> <p>COMPLIANT</p>	Jan 1, 2012	Sept 27 th , 2018
80.51	Format of Documents	Ensure documents requested by the public under this Regulation are provided in a format that takes into account a person's disability	<p>Upon receipt of a request PHARA will work with the requestor to provide documents in an appropriate accessible format or communication support.</p> <p>ONGOING</p>	Jan 1, 2012	Ongoing

PART 2: GENERAL REQUIREMENTS

Ontario Regulation 191/11

Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
3	Establishment of Accessibility Policies	Develop, implement and maintain policies governing how accessibility will or has been achieved in relation to the Regulation, include a statement committing to meet the needs of persons with disabilities in a timely manner	<p>Policy AD-03: Accessibility was approved by the Board of Directors on May 31st 2018</p> <p>This policy addresses assistive devices, service animals, support persons, feedback and training.</p> <p>COMPLIANT</p>	Jan 1, 2012	May 31, 2018
4	Accessibility Plans	Establish, implement, maintain and document a multi-year accessibility plan which addresses strategies to prevent and remove barriers. This plan is to be reviewed and updated every 5 years, be posted on the website and provide accessible copies upon request.	<p>PHARA will review and update this plan in accordance with the Regulation. As well as when there are any relevant legislative or policy changes.</p> <p>PHARA will maintain all FLS requirements and public posting requirements.</p>	January 2023 for the new approved November 2022 rendition	Ongoing
5	Procuring or Acquiring Goods, Services, or Facilities, etc.	Incorporate accessibility criteria and features when procuring or acquiring goods, services, or facilities.	<p>PHARA will incorporate accessibility criteria when procuring or acquiring any future goods, services or facilities.</p> <p>ONGOING</p>	Jan 1, 2013	Ongoing

Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
6	Self-Service Kiosks	Design, procure and acquire self-service kiosks with regard to the accessibility for persons with disabilities.	Any future design, procurement or acquirement of self-service kiosks by PHARA will be done with regard to accessibility needs. ONGOING	Jan 1, 2014	Ongoing
7	Training	Train all members, staff and volunteers on the requirements of the accessibility standards in the Integrated Accessibility Standard Regulation and on the Human Rights Code as it pertains to persons with disabilities.	PHARA's policy regarding training, Policy AD-03 was approved by the Board of Directors on May 31 st 2018 The procedure for who receives training as well as what is included in the training is addressed in the Customer Service Guide. COMPLIANT	Jan 1, 2012	July 13, 2018

PART 3: INFORMATION AND COMMUNICATION

Ontario Regulation 191/11

Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
11	Feedback	Establish a process for receiving and responding to feedback in a manner that is accessible to persons with disabilities.	<p>The feedback process is addressed in PHARA Policy AD-03 was approved by the Board of Directors on May 31st 2018.</p> <p>The feedback process is also addressed in the Customer Service Guide. The feedback forms can be found in the appendices of this document.</p> <p style="text-align: center;">COMPLIANT</p>	Jan 1, 2012	Sept 27 th , 2018
12	Accessible Formats and Communication Supports	Upon request, provide or arrange for the provision of accessible formats and communication supports, in a timely manner, that takes into account the requestors accessibility needs at a cost not exceeding the regular cost charged to others	<p>Upon request PHARA will provide information in an accessible format or with communication supports that take into account the individual accessibility needs of the requestor.</p> <p style="text-align: center;">ONGOING</p>	Jan 1, 2012	Ongoing
13	Emergency Procedure, Plans or Public Safety Information	Provide any emergency procedures, plans or public safety information, made available to the public, in accessible formats or with appropriate communication supports upon request.	<p>Any emergency plans, procedures and safety information that is available to the public will be provided in an accessible format or with communication support upon request.</p> <p style="text-align: center;">ONGOING</p>	Jan 1, 2012	Ongoing
Section	Requirement	Action Required	Compliance Status	Due Date	PHARA

					Completion Date
14	Accessible Websites and Web Content WCAG 2.0 Level A and Level AA	Ensure all new websites and web content meets Web Content Accessibility Guidelines (WCAG) 2.0 Level A initially, later increasing to Level AA	COMPLIANT	Jan 1, 2021	Sept 1 st , 2018

PART 4: EMPLOYMENT STANDARDS

Ontario Regulation 191/11

Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
22	General Recruitment	Notify employees and the public about availability of accommodation for applicants with disabilities in the recruitment process.	The following language is included on all job postings that PHARA creates: "PHARA welcomes and encourages applications from people with disabilities. Accommodations are available on request for candidates taking part in all aspects of the selection process." COMPLIANT	Jan 1, 2016	June 11, 2018
23	Recruitment, Assessment or Selection process	Notify the individuals selected to participate in an assessment or recruitment process that accommodations are available upon request in relation to the materials or processes to be used. If a request for accommodation is made consult with the requestor to provide appropriate accommodation.	The following language is included on all job postings that PHARA creates: "PHARA welcomes and encourages applications from people with disabilities. Accommodations are available on request for candidates taking part in all aspects of the selection process." COMPLIANT	Jan 1, 2016	June 11, 2018
24	Notice to Successful Applicants	When making offers of employment, notify successful applicants of policies for accommodating employees with disabilities.	The following language is included in all offer letters that PHARA provides: "PHARA has an accommodation process in place that provides accommodations for employees with disabilities. If you require a specific accommodation because of a disability or a medical need, please contact Karen Smith, Director of Operations at 705-476-0733 ext 222 or by e-mail at	Jan 1, 2016	June 11, 2018

			ksmith@phara.org. This ensures that the appropriate accommodations are in place before you begin your employment.”		
			COMPLIANT		
Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
25	Informing Employees of Supports	Inform employees, as soon as practicable, after they begin their employment of policies used to support employees with disabilities.	The following language is included in all offer letters that PHARA provides: “PHARA has an accommodation process in place that provides accommodations for employees with disabilities. If you require a specific accommodation because of a disability or a medical need, please contact Karen Smith, Director of Operations at 705-476-0733 ext 222 or by e-mail at ksmith@phara.org. This ensures that the appropriate accommodations are in place before you begin your employment.”	Jan 1, 2016	June 11, 2018
			COMPLIANT		
26	Accessible Formats and Communication Supports for Employees	Consult with the employee to provide or arrange for the provision of accessible formats and communication supports for any information that is required to perform their job or any information that is generally available to employees in the workplace.	This requirement is addressed in PHARA Policy HR-24: Workplace Accommodation which was approved by the Board of Directors on Sept 27 th , 2018 Any information that is required to perform a job and information that is generally available to all employees will be provided in an accessible format or with communication supports to any staff who requires it	Jan 1, 2016	Sept 27 th , 2018

			COMPLIANT		
Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
27	Workplace Emergency Response Information	Provide individualized workplace emergency response information to employees who have a disability. If the individual requires assistance, with their consent, provide the workplace emergency response information to the person designated to provide the assistance.	PHARA will provide employees with disabilities with individualized emergency response information. With the employees consent the information will be shared with individuals who will provide assistance to the employee if needed. Blank copies of all employee emergency response forms can be found in the appendices of this document. ONGOING	Jan 1, 2016	Ongoing
28	Documented Individual Accommodation Plans	Develop a written process for the development of documented individual accommodation plans for employees with disabilities.	PHARA Policy HR-24: Workplace Accommodation was approved by the Board of Directors on Sept 27 th , 2018 A blank Accommodation Plan worksheet can be found in the appendices of this document. COMPLIANT	Jan 1, 2016	Sept 27 th , 2018
29	Return to Work Process	Develop, document and implement 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	PHARA has a Health and Safety document in place that outlines its policy and procedure for Injury Management and Return to Work. Blank versions of all of Return to Work forms can be found in the appendices of this document.	Jan 1, 2016	Nov 2011

			COMPLIANT		
Section	Requirement	Action Required	Compliance Status	Due Date	PHARA Completion Date
30-32	Performance Management, Career Development and Advancement, and Redeployment.	Take accessibility needs and individual accommodation plans into account during performance management, while providing career development and advancement and when redeploying employees with disabilities.	<p>PHARA Policy HR-44 Performance Management was approved by the Board of Directors on Sept 27th, 2018.</p> <p>COMPLIANT</p>	Jan 1, 2016	Sept 27 th , 2018

PART 5: TRANSPORTATION

Ontario Regulation 191/11

Conventional and Specialized transportation is provided through the City of North Bay.

PART 6: BUILT ENVIRONMENT

Ontario Regulation 191/11

PHARA strives to provide accessible built environments which meet the needs of persons with disabilities. All new construction that will take place on behalf of PHARA will comply with the Built Environment Standards as outlined in Ontario Regulation 191/11.

CONCLUSION

Please let us know what you think about PHARA's Multi-Year Accessibility Plan. Contact us to request a copy of the document in an accessible format or to provide us with feedback on the goods or services you receive.

By Mail or In Person:

PHARA
280 Oakwood Avenue
North Bay, ON
P1B 9G2

Telephone:

705-476-0733 ext. 239

Electronic Mail:

phara@phara.org

APPENDICES

- Appendix 1 - Customer Service Guide
- Appendix 2 - Injury Management and Return to Work Policy
- Appendix 3 – Return to Work Plan
- Appendix 4 – Return to Work Communication Log
- Appendix 5 – Exit Program form – Injury Management and Return to Work
- Appendix 6 – Customer Feedback Form
- Appendix 7 – Record of Customer Feedback Form
- Appendix 8 – Employee Emergency Information Worksheet
- Appendix 9 – Employee Emergency Response Information
- Appendix 10 – Individual Accommodation Plan