



AODA- INTEGRATED ACCESSIBILITY STANDARDS REGULATION (IASR) INFORMATION AND COMMUNICATION POLICY	Document Type: OPERATIONAL POLICY
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	Policy # 3.2.46

1.0 Purpose

The Information and Communication Policy is intended to meet the requirements of the *Integrated Accessibility Standards, Ontario Regulation 191/11* for the Information and Communications Standard set forth under the *Accessibility for Ontarians with Disabilities Act, 2005*. This policy applies to the provision of information and communication services and materials for people with disabilities. All information and communications materials and services provided by DPNCHC shall follow the principles of dignity, independence, integration and equal opportunity.

2.0 Revision History

Date	Change
January 2014	Protocol was Created, Reviewed & Approved by Policy Committee & Board
January 2017	Reviewed & Approved by Policy Committee
February 2017	Reviewed & Board Approved
February 2021	Reviewed & Approved by Policy Committee
March 2021	Reviewed & Board Approved
April 2022	Reviewed & Approved by Policy Committee & Board

3.0 Persons Affected

This policy shall apply to staff, volunteers and every person who deals with members of the public or their agents on behalf of DPNCHC.

4.0 Definitions

- 4.01 **Davenport-Perth Neighbourhood and Community Health Centre** is also referred to as DPNCHC or the Centre.
- 4.02 **AODA - Accessibility for Ontarians with Disabilities Act, 2005.**
- 4.03 **Integrated Accessibility Standards Regulation (IASR)** applies to all public, private and not-for-profit organizations. The IASR are legislated requirements organizations must meet in order to met AODA obligations in the areas of Information & Communications, Employment, Customer Service, Design of Public Spaces and Transportation. Only the Information and Communication, Employment and Customer Service Standards apply to DPNCHC.
- 4.04 **Accessible Formats** – include but not limited to large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities.
- 4.05 **Communication Supports** – include but not limited to captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications.

- 4.06 **Conversion Ready** – an electronic or digital format that facilitates conversion into an acceptable format.
- 4.07 **Designated Public Sector Organization** – refers to every municipality and every person or organization listed in Column 1 of Table 1 of *Ontario Regulation 146/10* (Public Bodies and Commission Public Bodies—Definitions) made under the *Public Service of Ontario Act, 2006*.
- 4.08 **Extranet Website** – a controlled extension of the intranet, or internal network of an organization to outside users over the Internet.
- 4.09 **Information** – includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and conveys meaning.
- 4.10 **Internet Website** – a collection of related Web pages, images, videos or other digital assets that are addressed relative to a common Uniform Resource Identifier (URI) and are accessible to the public.
- 4.11 **Intranet Website** – an organization’s internal website that is used to privately and securely share any part of the organization’s information or operational systems within the organization and includes extranet websites.
- 4.12 **Support Person** – in relation to a person with a disability, another person who accompanies the person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.
- 4.13 **Web Content Accessibility Guidelines** – refers to the World Wide Web Consortium Recommendation, dated December 2008, entitled “Web Content Accessibility Guidelines (WCAG) 2.0.”

5.0 **Policy**

In accordance with the *Integrated Accessibility Standards, Ontario Regulation 191/11*, this policy addresses the following:

- A. General Requirements
- B. Accessible Formats and Communication Supports
- C. Accessible Websites and Web Content
- D. Emergency Procedures, Plans or Public Safety Information
- E. Exceptions
- F. Feedback

A. General Requirements

The following general requirements apply to the five standards: Information and Communications, Employment, Customer Service, Design of Public Spaces and Transportation but only the Information and Communication, Employment and Customer Service Standards apply to DPNCHC.

Establishment of Accessibility Policies and Plans

DPNCHC will develop, implement and maintain policies governing how it will achieve accessibility through these requirements. DPNCHC is responsible for including a statement of its commitment to meeting the accessibility needs of persons with disabilities in a timely manner in its policies. This will be achieved through documentation in DPNCHC’s policies and making these documents publicly available, in an accessible format upon request.

DPNCHC will establish, implement, maintain and document a multi-year accessibility plan outlining its strategy to prevent and remove barriers and meet its requirements under the IASR regulation. DPNCHC will post its accessibility plans on its website and provide the plan in an accessible format

upon request. DPNCHC will review and update its accessibility plan once every five years and will establish, review and update its accessibility plans in consultation with persons with disabilities or an advisory committee. Annual status reports will be prepared to report on the progress of steps taken to implement DPNCHC's accessibility plan. These status reports will be posted on DPNCHC's website. If requested, the reports shall be created in an accessible format.

Procuring or Acquiring Goods and Services, or Facilities

DPNCHC will incorporate accessibility criteria and features when procuring or acquiring goods, services or facilities. The only exception is in cases where it is impracticable to do so.

Training Requirements

DPNCHC will provide training for its employees and volunteers regarding the IASR and the Ontario *Human Rights Code*. Training will be provided for individuals who are responsible for developing DPNCHC's policies, and all other persons who provide goods, services or facilities on behalf of DPNCHC. Training will be provided as soon as is reasonably practicable and regularly to new employees and as changes to DPNCHC's accessibility policies occur. We will maintain records on the training provided, when it was provided and the number of employees who were trained.

B. Accessible Formats and Communication Supports

Unless deemed unconvertible, DPNCHC will provide or arrange for the provision of accessible formats and communication supports for persons with disabilities in a timely manner and at no cost to the individual. DPNCHC will take into account the person's accessibility needs when customizing individual requests and will consult with the individual making the request to ensure suitability.

C. Accessible Websites and Web Content

Departments governed by DPNCHC will make their web content conform to the Web Content Accessibility Guidelines (WCAG) 2.0 at Level AA. Web content includes any information which resides on an internet or intranet website.

D. Emergency Procedures, Plans or Public Safety Information

When DPNCHC prepares public emergency procedures, plans or public safety information, it is responsible for providing the information in an accessible format or with appropriate communication supports as soon as practicable, upon request.

E. Exceptions

- a. The *Information and Communications Standard* does not apply to products and product labels; unconvertible information or communications, or information that DPNCHC does not control directly or indirectly through a contractual relationship. If DPNCHC determines that information or communications are unconvertible, it will provide the person requesting information or communication with the following (Information is regarded as *unconvertible* if it is not technically feasible to convert the information or communications, or if the technology to convert the information is not readily available).
- b. An explanation as to why the information or communications are unconvertible
- c. A summary of the unconvertible information or communications

F. Feedback Process

DPNCHC has a process in place for receiving and responding to feedback. DPNCHC shall notify the public about the availability of these accessible formats and, upon request, must ensure that all

feedback processes, both internal and external are accessible to persons with disabilities by providing or arranging for the provision of accessible formats and communications supports. DPNCHC will solicit feedback from the public on the accessibility of the feedback process itself.

6.0 Procedures

Administration

If you have any questions or concerns about this policy or its related procedures, please contact:

HR Coordinator
416 656-8025, ext 368
1900 Davenport Road, Toronto, ON
M6N 1B7
E: info@dpnchc.ca

This policy and its related procedures will be reviewed as required in the event of legislative changes.

7.0 Cross References

Also, see:

- 3.2.41 Customer Service Policy
- 3.2.42 Accessibility for Ontarians with Disabilities Training Policy
- 3.2.45 Employment Policy

Referenced Documents

- Accessibility for Ontarians with Disabilities Act, 2005
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_05a11_e.htm#BK19
- Integrated Accessibility Standards, Ontario Regulation 191/11
http://www.e-laws.gov.on.ca/html/source/regs/english/2011/elaws_src_regs_r11191_e.htm#BK0
- Ministry of Community and Social Services, *Making Ontario Accessible* (Access ON)
<http://www.mcscs.gov.on.ca/en/mcscs/programs/accessibility/index.aspx>
- Ontario Human Rights Code, 1990
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90h19_e.htm
- WWW Consortium Web Content Accessibility Guidelines 2.0
<http://www.w3.org/WAI/intro/wcag>

Integrated Accessibility Standards Regulation Policy, Information & Communications Standard

Acknowledgement & Agreement

I, _____, acknowledge that I have read and understand the AODA
(print name)

Integrated Accessibility Standards Regulation Policy, Information & Communications Standard of DPNCHC. Further, I agree to adhere to this Policy and will ensure that employees working under my direction adhere to these guiding principles. I understand that if I violate this Policy, I may face corrective action, up to and including termination of employment.

Name: _____

Signature: _____

Date: _____

Witness: _____