



Policy: AODA (Accessibility for Ontarians with Disabilities Act) Policy
Subsection: (Finance, Governance, HR, etc.): Human Resources
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1. Purpose

The Canadian Paralympic Committee’s (“CPC”) vision is “through Paralympic sport, an inclusive world”. We imagine an inclusive Canada where people feel a sense of belonging; where accessibility is centered, where we work together to create access; and where people with disabilities are valued for all their capabilities, diversity, and differences. Through Paralympic sport, we have a platform to model and promote what disability inclusion and accessibility can look like, and we will work across several areas to drive meaningful change.

This policy meets the requirements of the AODA which we consider to be minimal standards. We strive to achieve inclusion above and beyond the AODA accessibility standards in order to meet our vision of an inclusive world.

In keeping with the standards of the Accessibility for Ontarians with Disabilities Act, 2005 (AODA) and the Ontario Human Rights Code, CPC will strive to continuously improve the accessibility of services and meet the needs of individuals with disabilities. CPC will do this by working to reduce and/or eliminate barriers, including physical, environmental, attitudinal, communication, technological, and systemic that may prevent the full participation of persons with disabilities in CPC’s services and support. We are committed to ensuring that all AODA requirements are adhered to in a rigorous fashion. Everyone has a role in creating an equitable and inclusive environment, as well as in the accommodation process and the identification, removal, and/or reduction of accessibility barriers. Any policy of the CPC that does not contribute to the dignity and independence of people with disabilities will be modified or removed.



2. Equity, Diversity & Inclusion

This policy has been assessed for any implications it may have on inclusion, diversity, equity, and accessibility.

3. Scope of Policy

This Policy applies to all CPC full-time and part-time employees, employees on short-term contracts, interns, Board of Directors, and volunteers.

4. Responsibilities

4.1 The Board of Directors are responsible for:

- Provide oversight of the Policy.
- Ensure that this policy and procedure is accessible, available to, and supported by all staff; and
- Review and monitor initial risk assessments and subsequent reviews.

4.2 CEO/Senior Leadership are responsible for ensuring that:

- Providing corporate leadership on the implementation of this Policy in order to achieve organizational objectives.
- Overseeing the implementation of CPC's AODA Policy
- Ensure CPC staff receives appropriate training on the content of this Policy.

4.3 Employees are responsible for:

- Participate in AODA training.
- Familiarize with the content of the Policy.

4.4 People & Culture Committee is responsible for:

- Annual Review of this Policy.

5. Definitions

Accessible Formats: include, but are not limited to accessible electronic formats, Braille, text transcripts, large print, recorded audio, colour contrasts, and other formats accessible to persons with disabilities.

Assistive Device: a technical aid, communication device, or other instrument that is used to maintain or improve the functional abilities of people with disabilities. Personal assistive devices are typically devices that people bring with them such as a wheelchair, walker, or a personal oxygen tank that might assist in hearing, seeing, communicating, moving, breathing, remembering, and/or reading.



Barrier: as defined by the Ontarians with Disabilities Act, 2001, anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. This includes:

- Physical barriers,
- Architectural barriers,
- Informational or communications barriers,
- Attitudinal barriers,
- Policy, practice, or procedure barriers.

Client, Consumer, Customer: ^[SEP] a person who inquires about our services, access our services, or does business with us. ^[SEP]

Communication Supports: include but are not limited to sign language, plain language, closed captioning, and other communication supports that facilitate effective communications.

Disability: A key feature of the AODA is its definition of "disability". Under the AODA, the definition of "disability" is the same as the definition in the Ontario Human Rights Code:

Any degree of physical disability, infirmity, malformation, or disfigurement including, but not limited to:

- Diabetes mellitus;
- Epilepsy;
- A brain injury;
- Any degree of paralysis;
- Amputation;
- Lack of physical coordination;
- Blindness or visual impediment;
- 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 a 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 & Insurance Act, 1997.

Service Animal: an animal is qualified to be a service animal:

- If it is readily apparent the animal is used by the person for reasons relating to his or her disability;

or ^[1]_[SEP]

- The person provides a letter from a physician or nurse confirming the use of the animal for reasons relating to the disability. ^[1]_[SEP]

Support Persons: any person, whether a paid professional, volunteer, family member, or friend, who accompanies a person with a disability to help with communications, mobility, personal care, or medical needs while accessing our goods and services.

6. Implementation

Training

We know that training provides people with the tools and resources they need to serve people effectively. Training also helps our employees and volunteers develop their skills. We are committed to all members of the Paralympic community and endeavor to deliver high-quality training to obtain the best possible outcomes.

To that end, CPC's training meets all relevant requirements of the AODA as well as the Ontario Human Rights Code. Training has been delivered to all employees who deal with clients, the public, or third parties on our behalf as well as to people involved in the development of policies, plans, practices, and procedures related to the provision of our goods and services.

Training is also included as part of onboarding for new employees and refreshed on a regular basis. Documentation is kept on employee training.

As appropriate to the employee's function, AODA training covers:

- An overview of the AODA and its Regulations
- All requirements of the Customer Service Standard including:
 - How to interact and communicate with people with various types of disabilities
 - How to interact with people with disabilities who use an assistive device or require the assistance of a service animal or a support person



- What to do if a person with a disability is having difficulty accessing Cota's services
- Requirements related to information and communications including:
 - The elements of accessible websites
 - Types of accessible formats
 - Colour contrast and accessibility
 - Developing accessible documents
- Requirements of the Employment Standard and Cota's policies, including:
 - Recruitment, assessment and selection
 - Accessible formats and communications
 - Workplace emergency response information
 - Documented individual accommodation plans
 - Return to work
 - Performance management
 - Career development and advancement
 - Redeployment
- The Ontario Human Rights Code as it relates to people with disabilities.
- Similarities and differences between the AODA and the Ontario Human Rights Code

7. Procurement

As required, we will endeavor to incorporate accessibility provisions into our procurement practices. We understand that when accessibility is used as one of the criteria for purchasing decisions, the outcome will be products and services that are universally accessible to everyone. Where applicable, our procurement practices may outline the desired accessibility elements to be met. Examples where accessible procurement may be relevant may include computer purchases, software, office equipment, and leasing space.

8. Customer Service Policy

CPC is committed to excellence in serving all people with disabilities. For the purposes of this customer service policy, employee means every person who deals with clients or members of the public on behalf of CPC whether the person does so as an employee, volunteer, contractor, or intern.

8.1 Assistive Devices

We will ensure that our staff is trained and familiar with various assistive devices we have on-site or that we provide that may be used by customers with disabilities while accessing our goods or services.

8.2 Communication

We will communicate with people with disabilities in ways that take into account their disability. Prior to making final decisions on alternate forms of communication when requested, we will consult with the affected individual. CPC will train employees who communicate with clients as how to effectively communicate with people with various types of disabilities.

8.3 Service Animals

We welcome people with disabilities and their service animals. Service animals are allowed on all parts of



our premises, typically open to the public or other third-party stakeholders unless prohibited by law. We welcome service animals in any CPC location that is typically open to the public or other third-party stakeholders and in all Games environments. Where the use of a service animal may impact the well-being of others (e.g., allergies), CPC will mediate and explore options for reasonable solutions with all parties involved. ^[1]_{SEP}

8.4 Support persons

A person with a disability who is accompanied by a support person will be allowed to have that person accompany them on our premises. At no time will a person with a disability who is accompanied by a support person be denied their support person while on our premises. Permission will be obtained from the person with a disability prior to a confidential conversation taking place with the support person present.

8.5 Feedback Process

CPC welcomes feedback about how accessible our customer service approaches are and how our steps to comply with AODA meet the needs of people living with various types of disabilities. ^[1]_{SEP}
Any feedback about how to improve accessibility is important to us. ^[1]_{SEP} This feedback may be provided in the following ways:

- By regular mail, addressed to Agustina Santos (Senior Manager, People & Culture) 100-85 Plymouth St, Ottawa ON K1S 3E3
- By telephone: 1 613-212-5899
- By email: asantos@paralympic.ca (Agustina Santos-Senior Manager, People & Culture)

If a person would like to register a complaint about CPC's accessibility to persons with disabilities, we request that the complaint be made in writing (e.g., by e-mail or letter) wherever possible. All written complaints will be treated as formal complaints and will receive follow-up. Instructions on how to register a formal complaint are posted on our website and support will be provided upon request.

9. Employment Policy

CPC is committed to an accessible and inclusive workplace where all employees are encouraged to excel without being hampered by barriers. For the purpose of the Employment Policy, employees include all paid employees, whether full-time, part-time, or seasonal. Volunteers or other unpaid persons are not covered by the employment standard.

CPC recognizes that both Ontario Human Rights Code policies and the AODA have specific requirements related to employment accommodation. While there is close alignment between the two pieces of legislation, they are not the same. This policy is specific to AODA Employment Standard requirements.

All employees will be notified with respect to CPC's AODA Employment policy.



9.1 Recruitment, assessment, and selection

During the recruitment process, CPC shall notify job applicants and the public about its commitment to accommodate those with disabilities and shall advise those selected for an interview that accommodation is available upon request. If a selected applicant requests accommodation, CPC shall consult with the applicant and provide or arrange for the provision of suitable accommodation in a manner that takes into account the applicant's accessibility needs due to disability.

Advertisements will include a statement that people with disabilities are invited to apply. (*NOTE – alternative – Advertisements will include a statement that CPC is an inclusive workplace and welcomes all qualified applicants to apply.*)

Successful applicants and employees shall be notified of CPC policies regarding accommodating employees with disabilities as soon as possible after their employment begins and whenever a change in policy takes place.

9.2 Accessible formats and communications support

As part of an approved accommodation plan, accessible formats and communication support may be provided. Appropriate formats will be provided in consultation with the individual. The final decision of what to provide rests with the CPC.

9.3 Workplace emergency response information

Individual and documented emergency and evacuation plans will be provided to any employee with accessibility needs as well as to any person designated to assist the employee, with the consent of that employee, and shall review the individualized workplace response information upon the following events:

- a) When the employee moves to a new location in the workplace;
- b) When the employee's overall accommodation needs are reviewed; and
- c) Upon review of CPC's general emergency response policies.

9.4 Documented individual accommodation plans

Any employee requesting accommodation will have a documented plan that will be reviewed and updated regularly. An individualized plan will take into account the nature and severity of the disability, the nature of the work, and the workplace environment. It will also include any emergency-related information, accessible formats and communications support, and any other accommodations a person needs to perform the essential duties of their job.

9.5 Return to work process

A documented process has been established for supporting employees who return to work for reasons related to disability. If an individual's illness or injury is covered by the Workplace Safety and Insurance



Act, then the Act's return to work processes applies.

9.6 Performance management, career advancement, and reassignment

An employee's accommodation needs will be taken into effect during the performance management process when determining advancement opportunities, and when a reassignment is being contemplated.

9.7 Review of job descriptions

Job descriptions will be reviewed to ensure that stated requirements are necessary, and any barriers are removed.

10. Information and Communications Policy

10.1 Alternate Formats

Ensuring that our people can communicate effectively is important to us. Our vision is to ensure that our communications are inclusive to everyone so that we can provide excellent service.

This policy relates to print and digital media as well as two-way communication via telephone, email, in-person, and virtual meetings and presentations. It does not apply to commercial products or product labels, information that is not controlled directly by CPC, or information or communications that cannot be converted.

We will ensure that we provide information and communications to our customers in alternate formats upon request and in a timely manner. Depending on the situation this may include, and is not limited to:

- Large print
- Braille
- Audio
- Closed captioning,
- High colour contrast
- American Sign Language
- Text transcription of audio or visual information
- Information written in plain language
- An electronic format formatted to be accessible for use with a screen reader

In determining an appropriate format, we commit to consulting with the requestor.

10.2 Websites

CPC is compliant with the Worldwide Consortium Accessible Guidelines 2.0 (WCAG) as outlined in section 14 of the Integrated Accessibility Standards Regulation.

10.3 Emergency Information

CPC will ensure that accessibility is considered in emergency procedures and that alternate formats are provided upon request.



11. Revision History

New Policy.

The Policy will be reviewed annually.