

# Accessibility Policy (Employment, Information & Communication, Customer Service, and Built Environment)

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## Intent

Forward House of London is committed to providing a barrier-free environment for all stakeholders, including clients, employees, job applicants, suppliers, and any visitors who enter the premises, work for the company, access information provided by the company, or use the company's goods and services.

The organization is committed to identify and remove barriers and prevent new barriers for persons with disabilities as they relate to employment, receipt of goods and services, the built environment, and information and communications. Forward House 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 meeting our accessibility requirements under the *Accessibility for Ontarians with Disabilities Act* and Ontario's accessibility laws.

Forward House is committed to meeting its current and ongoing obligations under the Ontario Human Rights Code respecting non-discrimination.

Forward House understands that obligations under the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA) and its accessibility standards do not substitute or limit its obligations under the Ontario Human Rights Code or obligations to people with disabilities under any other law.

## Definitions

- **Accessible formats:** Include but are not limited to large print, recorded audio and electronic formats, braille, and other formats usable by persons with disabilities.
- **Assistive device:** Any medical device, mobility aid, communication aid, or other aid that is specially designed to assist a person with a disability with a need related to their disability.
- **Communication supports:** Captioning, alternative and augmentative communication supports, plain language, sign language, and other supports that facilitate effective communications.
- **Constructive discrimination:** Also referred to as adverse effect, is discrimination that unintentionally singles out a particular group, resulting in unequal treatment.
- **Conversion-ready:** An electronic or digital format that facilitates conversion into an acceptable format.
- **Disability:** Any impairment, including a physical, mental, intellectual, cognitive, learning, communication, and sensory impairment, or functional limitation that is either permanent, temporary, or episodic in nature. It can be evident or not in interaction with a barrier to hinder a person's full and equal participation in society.

- Mobility aid: Any manual or electric wheelchair, scooter, boarding chair, walker, cane, crutch, prosthesis, or other aid that is specially designed to assist a person with a disability with a need related to mobility.
- Service animal: An animal that can be recognized by visual indicators such as a vest or harness that is being used by an individual with a disability for reasons relating to the person's disability.
- Support person: Another person who accompanies an individual with a disability in order to help with communication, mobility, personal care, medical needs, or access to goods and services.

## Guidelines

### Employment

Forward House of London makes every effort to identify, remove, and prevent barriers to employment by developing inclusive procedures that support and accommodate persons with disabilities throughout their recruitment and employment. Whenever a candidate requires accommodation to enable them to fully participate in the recruitment and selection process, or a current employee requires accommodation in the workplace, the company works with the individual to provide such accommodation up to the point of undue hardship.

#### Job Design

Forward House of London proactively conducts thorough job analyses to ensure new and existing job requirements are bona fide occupational requirements: that is, reasonable and made in good faith. To determine whether a requirement is bona fide, the company ensures the following:

1. The requirement achieves a goal that is rationally connected to performing the job;
2. The requirement is adopted in good faith and fulfils a legitimate work-related purpose; and
3. The requirement is reasonably necessary to accomplish a work-related process or task.

Where a requirement is not bona fide, the organization evaluates and determines whether reasonable accommodations can be provided to individuals to achieve equal opportunity in the workplace. The company always works to ensure job design is non-discriminatory, including assessing jobs and working requirements for the potential of constructive discrimination.

#### Recruitment and Hiring

Forward House of London will notify employees and the public about the availability of accommodation for job applicants who have disabilities. Applicants will be informed that these accommodations are available, upon request, for the interview process and for other candidate selection methods. Where an accommodation is requested, the company will consult with the applicant and provide or arrange for suitable accommodations in a manner that takes into account the applicant's accessibility needs due to disability.



Successful applicants will be made aware of the company's policies and supports for accommodating people with disabilities.

### Training and Development

Forward House of London recognizes that skills development and career planning can enrich the employment experience, increase engagement, and reduce turnover for all employees. To this end, all employees are treated equally regarding training opportunities, and the company does not discriminate against employees who require accommodation when considering eligibility for training and development.

The company aligns training and development programs to meet the needs of employees with disabilities and provides training as soon as reasonably practicable upon the person being assigned to applicable duties. Training programs are designed with flexibility to allow customization for the individual requirements of the employee, such as providing training materials in accessible or conversion-ready formats that take into account the need of the employee. The company considers employee barriers when implementing performance management processes, or when offering career development, employment support, or advancement opportunities.

We are committed to training all staff and volunteers in accessible customer service, and other Ontario accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities.

In addition, we will train:

- a. all persons who participate in developing the organization's policies; and
- b. all other persons who provide goods, services or facilities on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles.

Training includes:

- purpose of the *Accessibility for Ontarians with Disabilities Act, 2005* and the requirements of the Customer Service Standards
- review of the *Ontario Human Rights Code*.
- policies, procedures, and practices of the company pertaining to providing accessible customer service to customers with disabilities.
- 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
- how to use the equipment or devices available on-site or otherwise that may help with providing goods, services or facilities to people with disabilities. These include:

List Equipment/Devices:

- what to do if a person with a disability is having difficulty in accessing our organization's goods, services or facilities.

We train every person as soon as practicable after being hired and provide training in respect of any changes to the policies.

We maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.



## Emergency Response

If necessary or upon request, Forward House of London creates individualized workplace emergency response plans for employees with disabilities.

The emergency response plan considers the unique challenges created by the individual's disability and the physical nature of the workplace and is created in consultation with the employee.

If an employee with a disability requires assistance from a support person during an emergency, the company designates a fellow employee mutually agreed upon to act as such. Where necessary, this employee will have the required first aid training and certification necessary to provide emergency support.

Customized emergency response plans are reviewed when:

- The employee moves to a different physical location in the organization;
- The employee's overall accommodation needs or plans are reviewed; and
- The company reviews general emergency response policies.

## Documented Individual Accommodation Plans

Forward House of London will develop and have in place written processes for documenting individual accommodation plans for employees with disabilities. The development process for these plans will include:

- The ways in which the employee can participate in the development of the plan;
- The means by which the employee is assessed individually;
- The ways that an employer can request an evaluation by an outside medical expert, or other experts (at the employer's expense) to determine whether accommodation can be achieved, or how it can be achieved;
- The ways that an employee can request the participation of a representative from their bargaining agent or other representative from the workplace (if the employee is not represented by a bargaining agent) for the creation 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 should be reviewed or updated and how it should be done;
- The way in which the reasons for the denial of an individual accommodation plan will be provided to the employee; and
- The means of providing the accommodation plan in an accessible format, based on the employee's accessibility needs.

The individual accommodation should also include information regarding accessible formats, communication supports (upon request), individualized workplace emergency response information, and any other accommodation provided.

## Return to Work

Forward House of London provides a supportive return-to-work program and develops and implements return-to-work processes for employees who are absent from work due to a disability and require accommodations to return to work. The company works with the employee



to develop an individualized return-to-work plan and support the employee in the transition period by identifying and eliminating or reducing any barriers. The return-to-work process outlines the steps the company will take to facilitate the employee's return to work and any individualized accommodation needs.

### Re-deployment

If an employee cannot be accommodated in their current position, even with accommodations to either the job processes or hours, Forward House of London will consider redeployment by placing the employee in an alternative position in the company. Depending on the employee's needs, redeployment to an alternative position may be temporary or permanent. Forward House will work with the Union and the employee to determine whether there is another available and suitable position to accommodate the employee's needs. If the accommodation requires a substantial change in the position, involving duties or hours, the position may be redesigned.

### Performance Management and Career Changes

Forward House of London will consider the accessibility needs, including documented individual accommodation plans, of employees with disabilities during the company's performance management process. These will also be considered in the event of redeployment, or when offering career development or advancement opportunities.

## **Information & Communication**

Forward House of London strives to provide information and communications to all in a format or manner that meets their needs. The company provides or arranges for the provision of accessible formats and communication supports for persons with disabilities upon request. This includes but is not limited to our feedback process and all publicly available safety and emergency information, such as evacuation procedures and floor plans. The company also ensures that our website and web content meet the standards required by the Integrated Accessibility Standards Regulation to enable accessible information and communications online.

The public is informed of the availability of accessible formats and communication supports by accessing the Accessibility Tab on the Forward House of London website, in person at the main office, or via telephone to the main office. Requests for accessible formats or communication supports should be submitted to the Executive Director by email or by telephone. The organization consults with the individual making the request to ensure a suitable format or communication support is provided. Accessible formats and communication supports are provided in a timely manner and at a cost no more than the original format.

### Exceptions

These standards do not apply to:

- Products and product labels;
- Unconvertible information or communications; or
- Information that the company does not control through a contractual relationship.

### Unconvertible Information or Communications

Information or communications are classified as unconvertible where it is not technically practicable to convert them, or the technology required to make the conversion is not readily



available. If Forward House of London determines that information or communications are unconvertible, the organization will provide the individual who made the request with an explanation as to why and a summary of the information or communications.

## **Customer Service**

Forward House of London makes every reasonable effort to ensure that its policies, practices, and procedures are consistent with the principles of dignity, independence, integration, and equal opportunity by:

- Allowing customers with disabilities to do things in their own ways and at their own pace when accessing goods, services, and facilities, as long as this does not present a health and safety risk;
- Using alternative methods of access when necessary to ensure that customers with disabilities have access to the same goods, services, and facilities in a similar manner;
- Take into account individual accommodation needs when providing goods and services; and
- Communicating in a manner that considers the customer's disability.

Upon request, the company provides a person with a disability with a copy of this policy, or the information contained within it, in a format that meets their accessibility needs. Requests should be directed to the Executive Director.

Persons with disabilities may use their own assistive devices or a device that Forward House has, as required when accessing goods or services or facilities. In cases where the assistive device presents a health and safety concern or where accessibility might be an issue, the Executive Director should be informed so that other reasonable measures can be put in place to ensure the access of goods and services.

### Access to Goods and Services

Forward House of London seeks to provide barrier-free access to the organization's goods and services for all customers and stakeholders. Where barriers cannot be removed, alternate means for accessing goods or services are provided to the best of the organization's ability. We will work with the person with disabilities to determine what method of communication works for them.

### Support Persons and Service Animals

If a person with a disability is accompanied by a support person, Forward House of London ensures that both persons may enter the premises together and that the person with a disability is not prevented from having access to the support person. A person with a disability accompanied by a service animal may access premises that are open to the public and third parties unless otherwise excluded by law.

When we cannot easily identify that an animal is a service animal, our staff may ask for documentation (template, letter or form) from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability. A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks.

A regulated health professional is defined as a member of one of the following colleges:



- College of Audiologists and Speech-Language Pathologists of Ontario
- College of Chiropractors of Ontario
- College of Nurses of Ontario
- College of Occupational Therapists of Ontario
- College of Optometrists of Ontario
- College of Physicians and Surgeons of Ontario
- College of Physiotherapists of Ontario
- College of Psychologists of Ontario
- College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario

If service animals are prohibited by another law, we will do the following to ensure people with disabilities can access our goods, services or facilities:

- explain why the animal is excluded
- discuss with the person with a disability another way of providing goods, services or facilities

In certain cases, this organization might require a person with a disability to be accompanied by a support person for the health or safety reasons of:

- the person with a disability
- others on the premises

The company waives admission fees to support persons, or when not possible, ensures the person with a disability is notified of admission costs in advance. Forward House will attempt to accommodate the person with a disability and support person to sit with one another.

In situations where confidential information might be discussed, consent is obtained from the person with a disability before any potentially confidential information is mentioned in front of the support person.

Before making a decision, Forward House will:

- consult with the person with a disability to understand their needs
- consider health or safety reasons based on available evidence
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises

If Forward House determines that a support person is required, we will waive the admission fee or fare (if applicable) for the support person.

### Communication

Forward House of London understands the importance of accessible digital and non-digital forms of communication and does its best to provide accessible types of communication and information to all individuals with disabilities. Such accessible formats and communication supports are provided upon request, in a timely manner and at no additional cost.

Forward House of London will ensure that employees are aware of policies for employees with disabilities and any changes to these policies as they occur. The company will provide the information required to new employees as soon as practicable after they begin their employment.





If an employee with a disability requests it, the company will provide or arrange for the provision of accessible formats and communication supports for the following:

- Information needed in order to perform their job; and
- Information that is generally available to all employees in the workplace.

The company will consult with the employee making the request to determine the best way to provide the accessible format or communication support.

### Service Disruptions

Service disruptions may occur for reasons that may or may not be within the control or knowledge of Forward House of London. In the event of any temporary disruptions to facilities or services that individuals with disabilities rely on to access or use goods or services, reasonable efforts will be made to provide advance notice.

When disruptions occur, Forward House will:

- Post notices in the nearest accessible entrance to the service disruption;
- Update the company website with information about the disruption; and include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.
- Contact customers/ individuals with disabilities with reservations or appointments by any method that may be reasonable under the circumstances.

The following information is provided regarding the disruption, unless it is not readily available or known:

- Goods or services that are disrupted or unavailable;
- Reason for the disruption;
- Expected duration; and
- A description of alternative services or options that are available.

Employees are informed of this information as soon as reasonably possible in the event of a disruption so that they can inform customers and respond to inquiries.

### Emergency Notifications

Forward House of London provides emergency and public safety information, plans, procedures, maps and warning signs at evacuation points, and any other emergency alert information in accessible formats or with appropriate communication supports, upon request. Alarm systems are both auditory and visual.

The company will:

- Work with any individuals requesting information to best meet their needs;
- Ensure emergency information can be seen, read, and heard by anyone, including people with disabilities; and





- If a person with a disability requires assistance in an emergency, make sure an employee is available to assist.

## **Design of Public Spaces**

Forward House will meet accessibility laws when building or making major changes to public spaces.

### Accessible Parking

Forward House of London will ensure that any newly constructed or redeveloped off-street parking facilities provide standard parking spaces and wider parking spaces with signage identifying them as van accessible. Access aisles will be provided for all accessible parking spaces to ensure individuals can enter and exit their vehicles.

Accessible parking spaces will be designated for the use of people disabilities and will be marked with an accessible permit parking sign. The number of and location of accessible parking spaces will be determined accordance with the IASR.

### Obtaining Services

To ensure services are accessible to individuals who use mobility aids or mobility assistive devices, Forward House of London will comply with the requirements set out in the IASR when:

- Constructing new service counters (including replacing them) and fixed queuing guides; and
- Constructing new or developing waiting areas.

## **Feedback**

Forward House of London acknowledges that customer, individuals with a disability and employee feedback can lead to improved service, increased clientele, a reduction in complaints, improved working conditions, and an improved workplace culture, especially as it applies to accessibility. The company ensures that feedback can be provided by persons with disabilities through various methods. Feedback forms, along with alternate accessible methods of providing feedback, are available on the Forward House of London website under the Accessibility tab, via email request, or a paper copy located at the main office.

Individuals who provide formal feedback receive acknowledgement of their feedback, along with information regarding any resulting actions based on their submitted concerns or complaints.

Feedback can be submitted to:

Mark Gowing  
[mgowing@forwardhouseoflondon.com](mailto:mgowing@forwardhouseoflondon.com)  
519-953-5039  
111 Waterloo St. Suite 402  
London, Ontario

Feedback can be provided anonymously if desired, and feedback remains confidential unless the person consents to the disclosure of their personal information. Feedback is received in whatever format the individual providing the feedback is most comfortable with. The personal



information of anyone who provides feedback remains confidential in accordance with all applicable privacy laws.

## **Building Accessibility**

Forward House of London works to ensure that the built environment, including building interiors and exteriors, is designed to facilitate barrier-free access to goods, services, and employment for customers, individuals with disabilities and employees. If areas of the built environment are not accessible for certain individuals with disabilities, the company will work with the individual to provide an alternate means of access up to the point of undue hardship.

### Review

This policy will be reviewed regularly to ensure that it reflects current practices of Forward House of London as well as legislative requirements.

## **Acknowledgement and Agreement**

By signing below, I acknowledge that I have read and understand the contents of this policy. I agree to adhere to this policy and will ensure that employees working under my direction adhere to this policy. I understand that if I violate the rules set forth in this policy, I may face disciplinary action up to and including termination of employment.

Name: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_