

**Effective Date** March 22, 2018

**Approval Date** March 22, 2018

**Review Date** March 2023

Introduction	This policy supports OCH's commitment to providing quality services to persons with disabilities. It provides direction towards eliminating accessibility barriers to OCH housing, employment and services.  The policy recognizes the <i>Accessibility for Ontarians with Disabilities Act, 2005</i> (AODA) and the provincial standards of accessibility for persons with disabilities.  The Accessibility policy does not alter OCH's obligations to persons with disabilities under the <i>Ontario Human Rights Code</i> (the Code).
Policy Statement	OCH is committed to identifying, removing and preventing barriers for people with disabilities.  OCH will provide accessible housing, employment and services in a way that respects the dignity and independence of people with disabilities in compliance with the <i>Accessibility for Ontarians with Disabilities Act</i> (AODA) and in consideration of accessibility needs.
Policy Objectives	<ul> <li>Provide accessible housing, employment and services to persons with disabilities</li> <li>Communicate with tenants, employees, business invitees, volunteers and members of the public with consideration of accessibility needs</li> <li>Include and maintain accessible public spaces in new construction and redevelopment</li> <li>Accessibility approaches will be identified and planned in policies, procedures and business practices</li> </ul>

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Policy Principles	Equitable access to OCH employment, housing, facilities and services nurtures inclusive communities and workplaces
	<ul> <li>Integrating the needs of persons with disabilities into policies and business processes reflects OCH's core values</li> </ul>
	Respecting the dignity and independence of persons with disabilities is fundamental to delivering quality service
Application	This policy applies to all OCH employees, Board and Committee members, partners, volunteers, and business invitees.

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Key Roles	Key Responsibilities
Chief Executive Officer	<ul> <li>Promote an organizational culture of understanding regarding disabilities and accessibility</li> <li>Oversee the implementation of requirements under the AODA, and this Policy</li> </ul>
Vice President, Tenant Experience and Chief Operating Officer	<ul> <li>Provide corporate oversight and support regarding the interpretation, application and administration of the AODA, this policy, procedures and associated documentation</li> <li>Ensure corporate AODA compliance and performance reporting is completed</li> </ul>
Vice President, Asset Management	<ul> <li>Provide oversight and support regarding the provision of technical expertise relating to modifications to OCH assets for persons disabilities</li> <li>Ensure AODA compliance in new construction and redevelopment</li> </ul>
Vice President, Organizational Effectiveness	Provide oversight and support regarding AODA compliance for internal and external communication
Vice President, People and Culture	<ul> <li>Provide oversight and support regarding the application and interpretation of the AODA for employees with disabilities</li> <li>Ensure employee training on AODA is delivered and documented</li> </ul>
Vice Presidents	<ul> <li>Ensure that employees comply with the requirements under the AODA, this Policy, procedures and associated documentation</li> <li>Consider accessibility when developing policies, business processes or making decisions</li> </ul>

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	Consult and work with the appropriate departments and subject matter experts to achieve the objectives of this policy
Managers	Provide supervision and guidance to employees in understanding and complying with the AODA, this policy, procedures and associated documentation
	Discuss this policy and the AODA with employees and highlight any areas or examples that have particular relevance, given the nature of the employee's work
	Work in consultation with Human Resources to address requests for employee accommodation
	Identify barriers for persons with disabilities and work to reduce and eliminate them
	Ensure business invitee adherence to training and documentation requirements under the AODA and when dealing with tenants, members of the public or third parties on behalf of OCH
	Promote and reinforce with volunteers compliance with the AODA when dealing with tenants, members of the public or third parties on behalf of OCH
	Record training provided to volunteers by OCH and confirmation of training volunteers received through other organizations
Employees	Provide service to persons with disabilities in compliance with this policy, procedures and associated documentation
	Participate in finding solutions to meet the needs of persons with disabilities
	Notify a Manager or Human Resources of personal accessibility needs and requests for accommodation due to disability
Volunteers	Comply with the AODA when dealing with tenants, members of the public or third parties on behalf of OCH

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Related OCH Policies and Procedures	Customer Service Procedures Accommodating Employees with Disabilities Procedure Accommodating Tenants with Disabilities Procedure (under development) Return to Work Procedure
Other Supporting References	Accessibility for Ontarians with Disabilities Act AODA, Integrated Accessibility Standards Human Rights Code (Ontario) Ontario Non-Profit Housing Association (ONPHA) Accessibility for Customer Service Manual
Questions / Contact	Director, Tenant Policy, Legal and Special Projects Director, Planning and Engineering Director, Human Resources

Appendices	Appendix 1 – Definitions
	Appendix 2 – Document History

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# **Appendix 1 – Definitions**

Term	Definition	
Accommodation	The special arrangement made or assistance provided so that persons with disabilities can participate in the experiences available to persons without disabilities. Accommodation will vary depending on the person's unique needs.	
Barrier	Anything that prevents a person with a disability from fully participating in all aspects of society because of his or her disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or a practice.	
Business Invitees	Includes vendors, contractors and other providers of goods and services to OCH.	
Disability	<ul> <li>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 impediment, deafness or hearing impediment, muteness or speech impediment, or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device,</li> <li>A condition of mental impairment or a developmental disability,</li> </ul>	
	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, or	
	An injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997	
Manager	Includes an employee's direct supervisor including a Manager, Director, Vice President or Chief Executive Officer.	

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# Appendix 2 – Document History

Revision Number	Date	Author(s)	<b>Brief Description of Change</b>	
1.0	December 8 2011	Kelly Hastings	Customer Service Standards Policy Approved by Board of Directors	
1.1	October 6, 2017	Kelly Hastings	Scope broadened to comply with AODA, Integrated Accessibility Standards	
			Revised formatting to meet current standards.	
1.2	October 12, 2017	Kelly Hastings	Included feedback from Manager, Total Compensation and HR Policy	
1.3	November 30, 2017	Kelly Hastings	Added minor changes identified by members of ELT	
1.4	December 6, 2017	Kelly Hastings	Clarified manager responsibility to ensure business invitee compliance; removed business invitee from roles and responsibilities	
2.0	March 22, 2018		Approved by the Board of Directors	

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