



MULTI-YEAR ACCESSIBILITY PLAN 2024-2029

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Introduction

Community Living Greater Sudbury's (CLGS) mission is to recognize challenges and provide the highest quality service and support that empowers people to reach for their own goals. We achieve this through our understanding of the harmful effects of marginalization, discrimination and oppression as well as supporting individuals to live their best lives. We direct our energies to support individuals and families in our core service areas – residential housing, community support services, and host families.

We envision a city in which people are resilient and thriving in more inclusive and supportive communities. CLGS also administers PassportONE for our Passport recipients. At the same time, we work to influence policy, build knowledge, strengthen communities and advocate for system change.

Statement of Commitment

Community Living Greater Sudbury is committed to building an inclusive society by providing a barrier-free environment for clients, staff, community members and visitors who enter our premises, use our services and access our information. We strive to meet the needs of individuals with disabilities in a timely and effective manner and in a way that meets their individual needs. We ensure that our service delivery supports the core principles of the *Accessibility for Ontarians with Disabilities Act, 2005 (AODA)*: independence, dignity, integration and equal opportunity.

CLGS respects and upholds the goals and requirements set forth under the AODA and its associated regulations. CLGS will ensure that its policies, procedures and best practices are consistent with the accessibility standards established under the AODA and will work to identify and remove physical, attitudinal and systemic barriers.

CLGS's *Accessible Customer Service Policy (1.08)* includes its *Statement of Commitment* and requirements for employees at all levels of the organization to meet the accessibility requirements for persons with disabilities in a timely manner.

General Requirements

i. **Accessibility Policies**

CLGS developed, implemented and maintains Accessibility Policies, Procedures and Directives including *Accessible Customer Service Policy (1.08)*. Other CLGS policies and procedures related to the AODA requirements include:

- 1.06 Complaints & Feedback
- 1.09 Business Continuity Planning
- 5.0 Admissions Process
- 7.08 Respectful Workplace

- 8.01 Recruitment, Hiring and Retention
- 8.09 Inclusivity Policy
- 5.26 Intake, Transfer and Termination of Service

ii. **Multi-Year Accessibility Plan**

CLGS has developed a Multi-Year Accessibility Plan (2024-2029) which is posted on CLGS's website. The plan will be provided in an accessible format, when requested. CLGS will prepare annual status updates on what has been done to achieve the Accessibility Plan. Updates will be posted on CLGS's website and will be provided in an accessible format, when requested.

The Plan will be reviewed and updated at least every five years based on changing accessibility requirements and feedback from internal and external stakeholders. In September 2024, a newly formed Accessibility Advisory Group including stakeholders with lived experience will be initiated. They will provide input into CLGS's Accessibility Policies and Procedures and the Multi-Year Accessibility Plan.

Training

As detailed in the *Accessibility Framework on our website*, CLGS is committed to providing training to all personnel (employees, volunteers and students) on the purpose of the Act, the requirements, the *Integrated Accessibility Standards Regulations (IASR)* and the *Ontario Human Rights Code* as it relates to people with disabilities. Mandatory training is provided immediately after the commencement of employment or assignment as a key component of CLGS's onboarding/orientation process.

Management provides leadership in advancing organization-wide accessibility and building an inclusive and accessible environment for the public and CLGS personnel. Management team members who develop CLGS policies are required to have additional expertise, through additional training and/or experience. Changes to policies are communicated to staff and training is provided on an ongoing and annual basis. Training records indicating the names of staff and the dates of completion are maintained.

Training includes:

- i. How to interact and communicate with people with various types of disabilities.
- ii. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
- iii. How to use equipment or devices available on the provider's premises or otherwise provided by the provider that may help with the provision of goods, services or facilities to a person with a disability.

- iv. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods, services or facilities.

Information and Communication Standards

i. **Feedback**

CLGS has processes for receiving and responding to feedback about the manner in which it provides goods, services or facilities to persons with disabilities. The processes are posted on CLGS's website. The feedback process specifies the actions that the provider will take if a complaint is received about the manner in which it provides goods, services or facilities to persons with disabilities.

ii. **Format of Documents**

CLGS provides and arranges for accessible formats and communication supports, upon request. This is provided in a timely manner that takes into account the person's accessibility needs due to disability. CLGS will consult with the person making the request in determining the suitability of accessible formats or communication supports. This is done at a cost no more than the regular cost charged to other persons. CLGS informs the public about the availability of accessible formats and communication supports.

There are three situations where we can't provide accessible formats and communication supports:

1. It is technically impossible to convert a document.
2. When information is from another organization.
3. If CLGS doesn't have control over the information.

If CLGS can't convert something, we will provide the reasons why and provide a summary of the important points.

iii. **Billing**

CLGS is committed to providing accessible invoices to all service users who access fee charging programs and services. Invoices shall be made available in a range of accessible formats including hard copy or secure e-mail. Upon request invoices shall be created in large print.

Personnel shall answer any questions service users may have about the content of the invoice in person, by telephone or via secure e-mail.

iv. Accessible Websites and Web Content, Web Content Accessibility Guidelines (WCAG) 2.0 Level AA

CLGS is committed to ensuring the accessibility of its web content to all stakeholders and visitors with disabilities. CLGS's websites are designed to comply with WCAG 2.0 Level AA standards for web accessibility in accordance with the Integrated Accessibility Standards outlined in the *Accessibility for Ontarians with Disabilities Act, 2005* (AODA).

CLGS's Communications department monitors monthly accessibility reports from its web support service to ensure sites continue compliance with current and evolving standards. Issues identified as non-compliance are addressed and resolved as quickly as possible.

Corporate Website Management is the focus of CLGS Policy 11.10 which is reviewed and updated regularly to comply with any legislative changes. CLGS manages and maintains one website and all publicly available web content is addressed under this policy.

The website is:

1. <https://communitylivinggreatersudbury.ca/>

CLGS has four social media channels:

1. LinkedIn – <https://www.linkedin.com/in/community-living-greater-sudbury/>
2. X (Twitter) – https://x.com/Community_LGS
3. Instagram – <https://www.instagram.com/communitylivinggs/?hl=en>
4. Facebook – <https://www.secure.facebook.com/communitylivingGS/>

Customer Service Standards

i. Accessible Customer Service Policy

Community Living Greater Sudbury developed the *Accessible Customer Service policy* (1.08) which includes procedures regarding communication, telephone services, assistive devices, billing, use of service animals, use of support persons, notice of temporary disruption, training for personnel, as well as the procedure for feedback, complaints and questions and modifications to policies.

ii. Notice of Temporary Disruption

In the event of a planned or unexpected disruption, CLGS shall provide service users with as much advance notice as is reasonable. This notice shall include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

The notice shall be placed on CLGS's website, at public entrances and at reception counters on CLGS premises. If clients/participants will not reasonably have access to notifications through these means, personnel shall make every effort to contact them by phone or e-mail to inform them of the disruption.

iii. Use of Service Animals

CLGS welcomes people with disabilities who are accompanied by a service animal. At no time shall a person with a disability who is accompanied by a service animal be prevented from having access to their service animal.

iv. Use of Support Persons

CLGS welcomes people with disabilities who are accompanied by a support person. At no time shall a person with a disability, who is accompanied by a support person, be prevented from having access to their support person while on CLGS premises. Support persons who participate in a program or service for the purposes of supporting a person with a disability shall not be charged a fee.

Employment Standards

CLGS is committed to inclusive and accessible employment practices that attract and retain qualified employees with disabilities. By removing barriers across the employment life cycle, we create a workplace that is diverse and accessible.

i. Recruitment

All postings (internal and external) include notices about the availability of accommodations for disabilities, where needed to support the participation of persons with disabilities in recruitment processes. All postings include the statement:

"In accordance with Ontario Human Rights Code, Accessibility for Ontarians with Disabilities Act, 2005, and CLGS's Equity and Inclusion policy, accommodation will be provided in all parts of the hiring process. Applicants need to make their needs known in advance."

Job applicants who are selected for an interview and/or testing are notified that accommodations are available, upon request in relation to the materials or processes to be used.

If a selected applicant requests an accommodation, we will consult with the applicant and provide a suitable accommodation that takes into account the applicant's accessibility needs due to disability. When making an offer of

employment we notify the successful applicant of CLGS policies for accommodating employees with disabilities.

i. Informing employees of supports

CLGS informs its employees of its policies used to support its employees with disabilities, including, but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

CLGS provides the information to new employees as soon as practicable after they begin their employment.

CLGS provides updated information to its employees whenever there is a change to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability.

ii. Accessible formats and communication supports for employees

Where an employee with a disability requests it, CLGS shall consult with the employee to provide or arrange for the provision of accessible formats and communication supports for:

- a. information that is needed in order to perform the employee's job;
and
- b. information that is generally available to employees in the workplace.

CLGS shall consult with the employee making the request in determining the suitability of an accessible format or communication support.

iii. Workplace emergency response information

CLGS will provide individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary, and the employer is aware of the need for accommodation due to the employee's disability.

If an employee who receives individualized workplace emergency response information requires assistance and with the employee's consent, the employer shall provide the workplace emergency response information to the person designated by the employer to provide assistance to the employee.

CLGS shall provide the information required under this section as soon as practicable after the employer becomes aware of the need for accommodation

due to the employee's disability. CLGS will review the individualized workplace emergency response information when:

- a. the employee moves to a different location in the organization;
- b. the employee's overall accommodations needs or plans are reviewed;
and
- c. when CLGS reviews its general emergency response policies.

iv. Documented individual accommodation plans

CLGS has a written process for the development of documented individual accommodation plans for employees with disabilities. The process includes the following components:

1. The manner in which an employee requesting accommodation can participate in the development of the individual accommodation plan.
2. The means by which the employee is assessed on an individual basis.
3. The manner in which the employer can request an evaluation by an outside medical or other expert, at the employer's expense, to assist the employer in determining if accommodation can be achieved and, if so, how accommodation can be achieved.
4. The manner in which the employee can request the participation of a representative from their bargaining agent, where the employee is represented by a bargaining agent, or other representative from the workplace, where the employee is not represented by a bargaining agent, in the development of the accommodation plan.
5. The steps taken to protect the privacy of the employee's personal information.
6. The frequency with which the individual accommodation plan will be reviewed and updated and the manner in which it will be done.
7. If an individual accommodation plan is denied, the manner in which the reasons for the denial will be provided to the employee.
8. The means of providing the individual accommodation plan in a format that takes into account the employee's accessibility needs due to disability.
9. Individual accommodation plans will:
 - a. if requested by the employee, include any information regarding accessible formats and communications supports provided,

- b. if required, include individualized workplace emergency response information, and
- c. identify any other accommodation that is to be provided.

v. Return to work process.

CLGS has 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. The process includes the steps that CLGS will take to facilitate the return to work and includes documented individual accommodation plans. The return-to-work process referenced in this does not replace or override any other return-to-work process created by or under any other statute.

vi. Performance management

CLGS's performance management process will take into account the accessibility needs of employees with disabilities, as well as individual accommodation plans.

vii. Career development and advancement

CLGS's career development and advancement process will take into account the accessibility needs of its employees with disabilities as well as any individual accommodation plans.

Career development and advancement includes providing additional responsibilities within an employee's current position and the movement of an employee from one job to another in an organization that may be higher in pay, provide greater responsibility or be at a higher level in the organization or any combination of them and, for both additional responsibilities and employee movement, is usually based on merit or seniority, or a combination of them.

Design of Public Spaces Standards

In 2021, Community Living Greater Sudbury moved into a new administration office which has an accessible welcome desk and counter in the main lobby. It is fully accessible for people with mobility aids. The design is in keeping with the requirements set out in the Integrated Accessibility Standards - The Design of Public Spaces Standards and Ontario's Building Code.

Procedures for preventative and emergency maintenance of the accessible elements of Community Living Greater Sudbury's (CLGS) public spaces are included in CLGS's Asset Management Program.

Procedures for dealing with temporary disruptions when accessible elements are not in working order are included in CLGS's Accessible Customer Service policy (1.08).

Measuring Results and Seeking Feedback

- i. Accessibility Status Reports
 - a. We'll create yearly reports outlining how we've achieved our goals and legislative requirements.
 - b. These reports, based on this plan, will be accessible on our website and can be provided in different formats upon request.
- ii. Reviewing Feedback
 - a. We'll assess and learn from feedback received throughout the year to enhance our processes.
 - b. This information may be incorporated into our accessibility reports and long-term plans.
- iii. Revisions to Accessibility Plan
 - a. If feedback, public input, or our internal processes suggest the need, we'll update our multi-year plan.
 - b. Revised plans will be accessible on our website and can be provided in alternative formats upon request.

Feedback is Welcomed!

We value your input on our accessibility efforts and compliance with AODA and IASR.

Contact us via email at ssalo@clgs.ca or by phone at 705-671-7181 Ext. 211.

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