



Title: Accessibility Policy	Policy No.:
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1.0 Purpose

In 2005, the Ontario government passed the *Accessibility for Ontarians with Disabilities Act*, (AODA) with the goal to make Ontario accessible to people with disabilities in key areas of daily living. People with disabilities are a vibrant, important and growing part of the Ontario population.

The purpose of the Accessibility Policy is to outline YMCA of Greater Toronto's commitment to working towards being compliant with all the standards under the AODA and to move the Association towards the goal of improved accessibility for people with disabilities.

Our commitment to ensure accessible customer service was reflected in our Accessibility and Customer Service Policy, implemented in January 2011. The elements of that policy have now been added to this overall Accessibility policy. YMCA of Greater Toronto ("YMCA") is committed to Diversity, Equity, Inclusion and Belonging (DEIB) and to providing accessible environments that respect the rights of every individual.

2.0 Persons Affected

This policy applies to employees, participants, visitors, contractors and subcontractors engaged by YMCA, volunteers, and candidates for employment and volunteer positions related to all locations in which YMCA of Greater Toronto operates in Ontario.

3.0 Policy

YMCA recognizes the dignity and worth of every individual and seeks to create inclusive and equitable environments in which everyone, including

persons with disabilities, are able to participate fully. Building on a culture that embraces diversity, inclusion, equity and belonging, YMCA is a shared experience for everyone to enjoy.

YMCA is committed to:

- The principles of dignity and independence of persons with disabilities, integration and equality of opportunity
- Our values of kindness, wellbeing, integrity, inclusiveness, respect and optimism
- Establishing, maintaining and implementing policies, and procedures in the AODA's Customer Service Standards and Integrated Accessibility Standards Regulations including information and communications, employment, and the built environment
- Meeting the accessibility needs of people with disabilities, in a timely manner, through the implementation of this policy
- Excellence in serving participants including people with disabilities. When providing information to, or communicating with a person with a disability, we will provide the information and communication in a manner that takes into account the person's disability
- Ongoing improvements to accessibility in our premises and facilities as required by law, as well as the services offered to customers, employees, and members of the general public
- Ongoing training of all employees, volunteers, persons who deal with customers or the public on YMCA's behalf
- Ongoing training on the requirements of the Integrated Regulations and also the Human Rights Code as it pertains to persons with disabilities.

4.0 Definitions

Accessible formats may include but are not limited to, large print, recorded audio and electronic formats, Braille, and other formats usable by persons with disabilities.

Accommodation is a way, through reasonable efforts or measures, of preventing or minimizing barriers that impede a person with a disability from fully participating in the services offered. Special arrangement is 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 individual's unique needs.

Assistive device is any device that helps a person with a disability do everyday tasks and activities. Assistive devices include digital audio players, hearing aids, teletypewriter (TTY) for people unable to speak or hear by phone, mobility devices (such as scooters, walkers or crutches, or white canes, oxygen tanks), and speech generating devices. Note: Bell has a Relay Service from any phone for free (1-800-855-0511).

Barrier is anything that prevents a person with a disability from fully participating in all aspects of society because of their disability. This may include architectural or physical barriers, an information or communications barrier making it difficult for people to receive or send information, an attitudinal barrier, a technological barrier, a policy, or a practice.

Communications means the interaction between two or more persons or entities or any combination of them, where information is provided, sent or received.

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

Customer is any person who uses the services of YMCA.

Dignity means service is provided in a way that allows the individual to maintain self-respect and the respect of other persons.

Disability means:

- Any degree of physical disability, infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness,
- 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 illness, 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.

Equal opportunity means service is provided to individuals in such a way that they have an opportunity to access goods or services equal to that given to others.

Independence means a person is able to do things on their own without

unnecessary help or interference from others.

Information includes data; facts and knowledge that exist in any format, including text, audio, digital or images that convey meaning.

Integration means service is provided in a way that allows the individual to benefit from equivalent services, in the same place, and in the same or similar way, as other individuals unless an alternative measure is necessary to enable the individual to access goods or services.

Reasonable efforts means taking approaches that meet the required needs of individuals.

Service animal is a Guide Dog as defined in the Blind Person's Rights Act or any animal that can be readily identified as one that is being used by the person for reasons relating to the person's disability, as a result of visual indicators such as the vest or harness worn by the animal. In other cases a support letter from a physician or nurse or other regulated health professional confirming that the person requires the animal for reasons relating to a disability is required. **NOTE:** A support animal which does not meet the above requirements is not considered a service animal.

Support animal is an animal which does not meet the requirements for a service animal (as noted above) and is not considered a service animal

Support person is another person who accompanies a person with a disability to help with communication, mobility, personal care or medical needs or with access to programs and services offered by the YMCA.

5.0 Responsibilities

5.1 **Senior manager and Manager Responsibilities:**

- Monitor and support staff in implementing the Accessibility Policy in their program or process area(s)
- Ensure that their program area(s) facilitate the use by persons with disabilities of their personal assistive devices, service animals, allow access for their support person, as outlined below, when accessing the program and moving through the building
- Ensure that staff participate in relevant training
- Respond to feedback including any accessibility-related issues or concerns
- Ensure notice of temporary disruption is provided where necessary

5.2 Employee and Program Volunteer Responsibilities:

- Participate in required training related to accessibility standards
- Support the implementation of accessibility standards by providing service in a manner that respects the dignity and independence of persons with disabilities, including permitting the use of assistive devices, service animals and support persons as outlined below. Suggested practices and tips for providing customer service for persons with disabilities are available by contacting a supervisor.
- Forward any feedback from members or customers regarding accessibility to their immediate supervisor or manager for handling.

5.3 The Chief Operating Officer and Chief People Officer or designate Responsibilities:

Ensure that processes are put in place to:

- Oversee the implementation of the Association's accessibility plan
- Identify training needs Association-wide
- Ensure that mechanisms are put in place to support managers implementing accessibility standards or responding to accessibility-related concerns
- Ensure that AODA reporting requirements on implementation of accessibility standards are completed and forwarded to the Ontario government
- Ensure that YMCA's policies, practices, and procedures related to the AODA are available to any person upon request
- Ensure that communications with persons with disabilities are done in a manner that takes into account their individual circumstances.

6.0 Procedures

YMCA will work to improve accessibility by developing and updating a multi-year accessibility plan which conforms to the Regulations, outlines a phased-in strategy to prevent and remove barriers. It will also address the identification, removal and prevention of barriers to people with disabilities within the Association; evaluate progress to achieve objectives as per AODA target dates. The plan will meet the needs of all customers and employees with disabilities, and provide a mechanism for reviewing and evaluating the implementation of the AODA Accessibility standards.

6.1 Procedures for Use of Assistive Devices, Service Animals, Support Persons:

- 6.1.1 **Assistive Devices:** Persons with disabilities may use their own personal assistive devices while accessing or using YMCA programs or services in any premise owned, leased or operated by YMCA. Possible barriers to the use of assistive devices will be removed where they can be.
- 6.1.2 **Service Animals:** Service animals are permitted to accompany any person with a disability while accessing or using public areas of YMCA programs or services in any premise owned, leased or operated by YMCA, except where animals are excluded by law (e.g. areas where food is being prepared) or where a Public Health Inspector deems it would constitute a health hazard.
- 6.1.2.1 YMCA staff must make all reasonable efforts to accommodate members, participants, volunteers and visitors with service animals.
- 6.1.2.2 In the ordinary course of business, YMCA staff and volunteers will not assume any responsibility for meeting the needs of the service animal (e.g. exercise, nutrition, toileting.) Persons with service animals must assume full responsibility for the care and behaviour of their service animal. Any requests for exceptions must be made in advance to the General Manager of the program area and will be determined in accordance with the Human Rights Code.
- 6.1.2.3 If any person sustains injuries from a service animal:
- 6.1.2.3.1 The person responsible for the service animal must provide up to date immunization records for the service animal
- 6.1.2.3.2 Any bites or scratches that occur in the City of Toronto must be reported to Toronto Public Health at 416-338-7600. In other regions, reporting may only be required if further investigation is needed. Check your region's requirements and report accordingly.
- 6.1.2.4 Where an animal is excluded by law from the premises, or may affect the health and safety of other individuals, alternative measures will be explored in order to provide service to the person with a disability.
- 6.1.2.5 Where it is not readily apparent that an animal is a service animal, YMCA may request a letter from a physician or nurse or other approved regulated health professional confirming that the animal is used by the person for reasons relating to their disability.

6.1.2.5.1 Approved regulated health professionals include members of the following:

- 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 Physiotherapists of Ontario;
- College of Psychologists of Ontario;
- College of Registered Psychotherapists and Registered
- Mental Health Therapists of Ontario.

6.1.2.5.2 A support animal which does not meet the above requirements is not considered a service animal.

6.1.3 **Support Persons:** Any person with a disability who is accompanied by their support person will be permitted to access and use a YMCA program or service with their support person.

6.1.3.1 In most cases, program fees shall be waived for the support person, provided that the support person remains beside the person with a disability when accessing and using a program or service, and while moving through the building or on YMCA property. However, where a YMCA program or registration fee is charged and a portion of revenues are payable to a third party, or where a fee includes or covers such costs as food or accommodation, the support person may be required to cover these costs. If any amount is payable by the support person, YMCA shall ensure that notice is given in advance about the amount that is payable in respect of the support person.

6.1.3.2 YMCA may require a person with a disability to be accompanied by a support person when on the premises, but only if a support person is necessary to protect the health or safety of the person with a disability or the health and safety of others on the premises.

6.2 Notice of Temporary Disruptions: YMCA is committed to informing stakeholders of any temporary disruption of service at any of its program sites. A temporary disruption means a short-term planned or unplanned

disruption to facilities or services.

6.2.1 If a planned temporary service disruption occurs that would limit a person with a disability from gaining access to YMCA programs, YMCA will let individuals know about the disruption through various means including messages posted to www.ymcagta.org and / or notices posted in building and / or communications to individuals affected by the disruption where feasible. Notices will include information about:

- the reason for the disruption
- its anticipated duration
- alternate means of accessing services if applicable
- alternate services that may be offered.

Contact the Communications Department for sample notice templates.

6.2.2 If an unexpected disruption occurs, YMCA will make every effort to accommodate persons with disabilities by providing services by alternate means.

6.2.3 Before visiting a YMCA program site, people are also encouraged to check the YMCA website www.ymcagta.org or call YMCA (416-928-9622 or 1-800-223-8024) to find out if there is a disruption of program or service and what if any alternative options exist.

6.3 Information and Communication: YMCA is committed to communicating with persons with disabilities in ways that take into consideration their unique needs.

6.3.1 YMCA staff and volunteers will be trained on how to communicate and interact with individuals with disabilities

6.3.2 Individuals with disabilities will be offered alternative communication formats that will meet their needs in a timely manner.

6.3.3 If one type of communication is not suitable for an individual's needs, alternative forms of communication will be offered.

6.3.4 General Managers responsible for various facilities in cooperation with the Asset Development Department staff will assess the emergency response plan and procedures and any other public safety information for barriers to persons with disabilities during an emergency.

6.3.5 General Managers are responsible for updating their emergency procedures to ensure that procedures can be followed by persons with disabilities and to ensure that they meet the needs of persons with disabilities.

- 6.3.6 Upon request, information will be provided in an accessible format or with communication supports as soon as practicable. YMCA will consult with the person with a disability in the case of a request for alternative accessible format and communication supports.
- 6.3.7 YMCA will receive and respond to feedback in accessible format when asked. This includes providing alternative formats such as surveys, focus groups or other processes by which to request input.
- 6.3.8 The public is notified about the availability of accessible formats and communication supports.

6.4 Employment Standard: The employment standard applies to paid employment and aims to make employment practices and workplaces more accessible to potential and existing employees with disabilities. The standard builds on existing requirements of the *Human Rights Code*.

- 6.4.1 Job postings will indicate that candidates can request an accommodation. Upon request, YMCA will provide reasonable accommodation during the hiring process
- 6.4.2 YMCA will work with employees upon request to provide reasonable accommodation
- 6.4.3 Volunteers and student placements may request accommodation through their staff partner and / or the registration process.
- 6.4.4 YMCA will provide individualized workplace emergency response information to employees who have disclosed a disability.

7.0 References and Links / Related Documents including links to Management Practices

YMCA's policies, practices and procedures related to the AODA are available to the public upon request. Where a request is made for a document by a person with a disability, YMCA provides the document or the information contained in the document in a format that takes into account the person's disability.

Staff may send any questions or requests for more information to the following email address: accessibility@ymcagta.org. Every question or information request will receive a response.

7.1 Links / Related Documents

[Accessibility Plan](#)

[Ontario Human Rights Code](#)

[Accessibility for Ontarians with Disabilities Act](#)

Human Rights Policy



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[Accommodation in the Workplace Policy](#)
[Non-discrimination and Harassment Policy](#)
[YMCA Safety and Emergencies Procedures](#)

8.0 Review/Revision History

Date	Revision No.	Revision Type	Reference Section(s)
December 1, 2013	1.0	New Policy	N/A
January 1, 2016	2.0	Revision	N/A
January 13, 2023	3.0	Updates	Revised to new policy format
June 6, 2024	3.5	Moderate	Clarification of Service Animal and Support Animal