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Policy Owner:	Director, Talent Management

1.0 Purpose

Pathways Canada is committed to providing a respectful, welcoming, accessible and inclusive environment for all. Pathways Canada strives to ensure that the Accessibility for Ontarians with Disabilities Act 2005 (AODA) and all other relevant legislation concerning accessibility are rigorously observed.

This policy is intended to meet the requirements of the Integrated Accessibility Standards for Customer Service and addresses the provision of goods and services to the public or other third parties. This policy is current to the most recent (July 1, 2018) changes to accessibility legislation.

2.0 Policy Scope

This policy applies to all employees of Pathways Canada.

3.0 Definitions

A full list of definitions can be found in Section 7.0 - Appendix A.

4.0 Policy Statement and Guidelines

The provision of all goods and services by Pathways Canada will follow the principles of dignity, independence, integration and equal opportunity, in accordance with the Integrated Accessibility Standards, Regulation under the Accessibility for Ontarians with Disabilities Act, 2005.

- The Provision of Goods and Services to Persons with Disabilities

- The Use of Assistive Devices
- The Use of Guide Dogs, Service Animals, and Service Dogs
- The Use of Support Persons
- Notice of Service Disruptions
- Customer Feedback
- Training
- Notice of Availability and Format of Required Documents

GENERAL REQUIREMENTS

Pathways Canada is committed to improving opportunities for persons with disabilities and implementing strategies that comply with the legislative requirements of the IASR.

Pathways Canada will:

- **Establish Accessibility Policies and Plans**
Pathways Canada will develop, implement and maintain policies governing how it will achieve accessibility.
- **Meet Training Requirements**
Pathways Canada will provide training for its employees and volunteers regarding the IASR and the [Ontario Human Rights Code](#) as they pertain to individuals with disabilities. Training will also be provided to individuals who are responsible for developing Pathways Canada's policies, and all other persons who work under a contractual agreement directly with Pathways Canada or provide goods, services or facilities on behalf of the Organization. Training will be provided as soon as is reasonably practicable, but no later than within the first three months of employment and ongoing as changes to Pathways Canada's accessibility policies occur.
- **Review AODA Policies**
This policy will be reviewed regularly to ensure that it is reflective of Pathways Canada's current practices as well as legislative requirements.

The Provision of Goods and Services to Persons with Disabilities

Pathways Canada will make every reasonable effort to ensure that its policies, practices and procedures are consistent with the principles of dignity, independence, integration and equal opportunity by:

- Ensuring that all customers receive the same value and quality
- Allowing customers with disabilities to do things in their own ways, at their own pace when accessing goods and services as long as this does not present safety risk

- Using alternative methods when possible to ensure that customers with disabilities have access to the same services, in the same place and in a similar manner
- Taking into account individual needs when providing goods and services
- Communicating in a manner that takes into account the customer's disability

The Use of Assistive Devices

Persons with disabilities may use their own assistive devices as required when accessing goods or services provided by Pathways Canada. In cases where the assistive device presents a safety concern or where accessibility might be an issue, other reasonable measures will be used to ensure the access of goods and services up to the point of undue hardship.

Guide Dogs, Service Animals and Service Dogs

A customer with a disability that is accompanied by guide dog, service animal, or service dog will be allowed access to premises that are open to the public unless otherwise excluded by law. "No pet" policies do not apply to guide dogs, service animals and/or service dogs.

Food Service Areas

A customer with a disability who is accompanied by guide dog or service animal will be allowed access to food service areas that are open to the public unless otherwise excluded by law.

Other types of service animals are only permitted into areas where food is served, sold, or offered for sale due to the *Health Protection and Promotion Act*, Ontario Regulation 493/17.

Exclusion Guidelines

If a customer's guide dog or service animal is excluded by law (see applicable laws below), Pathways to Education Canada will offer alternative methods to enable the person with a disability to access goods and services, when possible. For example, the company might accommodate a customer's disability by securing the animal in a safe location and offering the assistance of an employee to facilitate the delivery of goods and services.

Applicable Laws

Food Safety and Quality Act, 2001, Ontario Regulation 31/05: Animals not intended for slaughter or to be euthanized are not allowed in any area or room of a meat plant. An exception is made for service dogs to allow them in those areas of a meat plant where

food is served, sold, or offered for sale to customers and in those areas that do not contain animals or animal parts and are not used for the receiving, processing, packaging, labelling, shipping, handling, or storing of animals or parts of animals.

Dog Owners' Liability Act, 2005: If there is a conflict between a provision of this legislation or of a regulation under this or any other act relating to banned breeds (such as pit bulls) and a provision of a by-law passed by a municipality relating to these breeds, the provision that is more restrictive in relation to controls or bans on these breeds prevails. Staff will respectfully explain that the service animal must be removed from the public area due to a municipal by-law and make alternate arrangements or provide the service outside the public area.

Recognizing a Guide Dog, Service Dog and/or Service Animal: If it is not readily apparent that the animal is being used by the customer for reasons relating to his or her disability, Pathways Canada may request verification from the customer.

Care and Control of the Animal: The customer who is accompanied by a guide dog, service dog and/or service animal is responsible for maintaining care and control of the animal at all time.

Allergies and Other Health and Safety Concerns

If a health and safety concern presents itself, for example, in the form of a severe allergy to the animal, Pathways to Education Canada will make all reasonable efforts to meet the needs of all individuals. Pursuant to the company's obligations under the *Human Rights Code* and the *Occupational Health and Safety Act*, each customer's accommodation needs will be considered on a case-by-case basis, up to the point of undue hardship.

Due diligence needs to be paid to address health and safety requirements. For example, if a person's health and safety could be seriously affected by the presence of a service animal on the premises open to the public, management must fully analyse all options for safely accommodating the service animal. Options could include creating distance between the two individuals to eliminate in-person contact, changing the time the two individuals receive service, or using air purifiers and other measures that could allow the person to use their service animal on the premises.

In very exceptional circumstances where a service animal becomes out of control, causing a clear disruption or a threat to the health and safety of others, and the animal's behaviour is not corrected by the owner, a person with a disability can be asked to remove their service animal from the premises.

As a courtesy, particularly if the person and service animal have been in attendance on the premises for a long time, staff may ask whether the animal requires water, may

designate an area in which the service animal can relieve itself, or ask whether the staff can be of assistance pertaining to the service animal.

The Use of Support Persons

If a customer with a disability is accompanied by a support person, Pathways Canada will ensure that both persons are allowed to enter the premises together and that the customer is not prevented from having access to the support person. All customer confidentiality requirements and practices will also apply to support persons.

Notice of Disruptions in Service

Service disruptions may occur due to reasons that may or may not be within the control or knowledge of Pathways Canada. In the event of any temporary disruptions to facilities or services, reasonable efforts will be made to provide advance notice. In some circumstances such as in the situation of unplanned temporary disruptions, advance notice may not be possible.

When disruptions occur Pathways Canada will provide notice by:

- Posting notices in conspicuous places including at the point of disruption, at the main entrance and the nearest accessible entrance to the service disruption and/or on the Pathways Canada's website
- Contacting customers with appointments or scheduled meetings
- Verbally notifying customers when they are making an appointment
- By any other method that may be reasonable under the circumstances

In the event that a notification needs to be posted the following information will be included unless it is not readily available or known:

- Goods or services that are disrupted or unavailable
- Reason for the disruption
- Anticipated duration
- A description of alternative services or options

Customer Feedback

Pathways Canada will provide customers with the opportunity to provide feedback on the service provided to customers with disabilities. Information about the feedback process will be readily available to all customers and notice of the process will be made available on Pathways Canada's website. Alternate methods of providing feedback such as verbally (in person or by telephone) or written (hand written, delivered, website or email), will be available upon request.

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Feedback can be submitted to:

Office of the President and CEO

416-646-0123 ext. 110

439 University Avenue – Suite 1600, Toronto, ON M5G 1Y8

info@pathwayscanada.ca

Customers who provide formal feedback will receive acknowledgement of their feedback, along with any resulting actions based on concerns or complaints that were submitted within seven (7) days. Any feedback provided will be kept on file by the Office of the President and CEO.

Training

Training will be provided to all employees, volunteers, persons who provide goods and services on behalf of Pathways Canada, and persons who participate in the development of Pathways Canada's policies. The training will be provided as soon as practicable and as part of employee or volunteer orientation. Revised training will be provided in the event of changes to legislation or Pathways Canada's policies, practices or procedures. Pathways Canada will keep a record of training that includes the dates training or training resources were provided, the number of employees and names of employees trained.

Training will include; review of the AODA 2005, information on the purposes of the AODA requirements of the Customer Service Standards, how to communicate and interact with people with disabilities, how to interact with service animal or support person, how to utilize assisted devices that are available at Pathways Canada's premises, what to do if a person has difficulty accessing the Pathways Canada's services or facilities, and our policies procedures and practices pertaining to providing accessible customer service to people with disabilities.

5.0 Procedures and Responsibilities

The Director, Talent Management will be responsible for ensuring adherence to the policy requirements outlined in Section 4 and will monitor compliance of this policy and update the CEO and the HR & Compensation Committee on an annual basis.

6.0 Related Policies and Legislation

AODA – Information, Communications and Employment Policy (##)

Human Rights Policy (##)

Ontario Human Rights Code

Accessibility for Ontarians with Disabilities Act, 2005 (AODA)

Ontario Regulation 191/11, Integrated Accessibility Standards Regulations (IRASR)

Employment Standards Act

7.0 Supporting Information Exhibits / Appendices / Forms

Appendix A: Definitions

Assistive Device – Is 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 customers 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.

Accessible Formats– Include but are not limited to large print, recorded audio and electronic formats, braille and other formats usable by persons with disabilities.

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

Conversion Ready – An electronic or digital format that facilitates conversion into an acceptable format.

Customer – Those to whom Pathways provides a service which includes current and prospective donors, community partners, members of the public inquiring about Pathways, Pathways alumni, and job applicants.

Disability – The term disability as defined by the *Accessibility for Ontarians with Disabilities Act, 2005*, and the *Ontario Human Rights Code*, refers to:

- 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;

- A condition of mental impairment or a developmental disability;
- A learning disability, or 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*.

Guide Dog – Is a highly-trained working dog that has been trained at one of the facilities listed in Ontario Regulation 58 under the *Blind Persons' Rights Act*, to provide mobility, safety and increased independence for people who are blind.

Service Animal – an animal is a service animal for a person with a disability if:

1. the animal 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; or
2. the person provides documentation from one of the following regulated health professionals confirming that the person requires the animal for reasons relating to the disability:
 - A member of the College of Audiologists and Speech-Language Pathologists of Ontario;
 - A member of the College of Chiropractors of Ontario;
 - A member of the College of Nurses of Ontario;
 - A member of the College of Occupational Therapists of Ontario;
 - A member of the College of Optometrists of Ontario;
 - A member of the College of Physicians and Surgeons of Ontario;
 - A member of the College of Physiotherapists of Ontario;
 - A member of the College of Psychologists of Ontario; or
 - A member of the College of Registered Psychotherapists and Registered Mental Health Therapists of Ontario.

Service Dog – As reflected in *Health Protection and Promotion Act, Ontario Regulation 562* a dog other than a guide dog for the blind is a service dog if:

- It is readily apparent to an average person that the dog functions as a service dog for a person with a medical disability; or
- The person who requires the dog can provide on request a letter from a physician or nurse confirming that the person requires a service dog.

Services – the activities that Pathways undertakes that are related directly to its core mission, or, indirectly to serving its various customers or stakeholders. Services related to core mission include, but are not limited to: providing funding and support to community partners, working

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with current and prospective donors to secure funding, working with other community or government stakeholders, including volunteers, to further Pathways' work. Services related to other customers or stakeholders include but are not limited to: providing information through various communication including phone, digital media, advertising, printed materials or in-person.

Support Person – a support person means, in relation to a person with a disability, another person who accompanies him or her in order to help with communication, mobility, personal care, medical needs or access to goods and services.

Volunteer – a volunteer is defined as an individual who contributes time and talent to Pathways without compensation or expectation of compensation.