

Pathways to Education

Accessibility Plan **Updated December 2023**



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AODA Requirements

To be compliant with AODA, Pathways must have completed the following actions:

1. File an accessibility compliance report
2. Train staff and volunteers
3. Develop a statement of commitment to accessibility, and make it publicly available
4. Create a written accessibility policy, and make it publicly available
5. Create written multi-year accessibility plans, update them at least once every five years, and post them on our website along with accessibility plan

If requested, Pathways must provide its statement of commitment, accessibility policies and plan in an accessible format.

A statement of commitment establishes an organization's vision and goals for accessibility. It is an important first step in the development of accessibility policies and plans as it gives an organization purpose and direction. Accessibility policies are the formal rules an organization puts in place to achieve its accessibility goals. An accessibility plan outlines what steps an organization will take to prevent and remove barriers to accessibility and when it will do so. These three elements work in tandem. Together, they make accessibility a permanent part of our organization's culture and business practices.

Pathways' Approach

Pathways believes that part of inclusiveness is the removal and prevention of barriers to accessibility. A barrier free Pathways supports accessibility for all parties and benefits everyone. As such, we have and will continue to work with a cross-functional team of employees to develop and review our accessibility policies and plans. Pathways is committed to developing, implementing, and maintaining policies that govern how our organization achieves or exceeds accessibility requirements of the Accessibility for Ontarians with Disabilities Act. To facilitate this commitment, Pathways has established, maintained, and documented a policy and plan, that is reviewed and updated every five years, to identify progress made in addressing barriers. In order to drive change from the top, our team is led by Human Resources and includes at least one member of our Executive team in order to demonstrate commitment and to champion the multi-year accessibility plan.

Executive Commitment Statement

Pathways is committed to ensuring equal access, opportunity, and participation for people with Disabilities and is committed to treating people with Disabilities in a way that allows them to maintain their dignity and independence, while being fully integrated into all our organization has to offer.

An accessible Pathways is one that grants accessibility to all parties and is able to foster engagement and presence from the widest possible range of individuals. An accessible Pathways allows us to create a stronger bond with the communities, people, and workforce we influence.

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 by meeting or exceeding our accessibility requirements under Ontario's accessibility laws.

This commitment is part of the Pathways to Education's Accessibility policy and is also posted on the Pathways to Education website at www.pathwaystoeducation.ca.

Pathways' Accessibility Policy

Our accessibility policy and plan will be provided to all current and new employees and will require every individual to read and acknowledge through signature their review and commitment to this policy. Signed acknowledgements will be stored and managed by Human Resources.

This policy is posted on the Pathways to Education website at www.pathwaystoeducation.ca.

Identification of Barriers to Accessibility

In order to develop an accessibility plan, we have identified the various barriers to accessibility that either currently or potentially exist (see chart below). As part of our accessibility plan, we have assessed barriers in each category and developed appropriate plans when required.

Type of Barrier	Example
<p>Attitudinal: Behaviors, perceptions, and assumptions that discriminate against a person with disabilities. These barriers often emerge from a lack of understanding, which can lead to misconceptions or unawareness.</p>	<ul style="list-style-type: none"> • An individual who talks to an individual's support person rather than the individual with a disability. • Thinking that because a person's disability is not visible, they do not require accommodation.
<p>Informational and Communication: Occur when sensory disabilities, such as hearing, seeing, or learning disabilities, have not been considered. These barriers relate to both the sending and receiving of information. These barriers arise when a person with a disability cannot easily receive and/or understand information that is available to others.</p>	<ul style="list-style-type: none"> • A person with vision impairment may not be able to read printed material in small print, read signs, or see a hazard. • A person with an intellectual disability may not understand information that is not expressed in plain language. • Publications that are not available in large print, digitally, Braille or other accessible formats.
<p>Technological: These barriers occur when a device or technological platform is not accessible to its intended audience and cannot be used with an assistive device. Technology can enhance a user's experience, but it can also create unintentional barriers for some. Technological barriers are often related to information and communications barriers.</p>	<ul style="list-style-type: none"> • A website does not support screen-reading software or does not provide alternative text for images. • Material or handouts that are only available in hard copies.
<p>Organizational or Systemic: Barriers in policies, practices and procedures that unfairly discriminate and can prevent individuals from participating fully in a situation. These barriers are often put into place unintentionally and result in people with disabilities to being treated differently than others or sometimes excluded altogether.</p>	<ul style="list-style-type: none"> • Eligibility criteria that effectively exclude people with disabilities. For example, requiring a job applicant to have a driver's license even though it isn't essential to do the job. • A hiring process that only permits applicants to submit their resume through an online system and the organization does not offer any alternative processes. • Meetings or conferences that are held in locations that are not accessible to people with disabilities.

<p>Architectural or Physical: Elements of buildings or outdoor spaces that create barriers to persons with disabilities. These barriers relate to elements such as the design of a building’s stairs or doorways, the layouts of rooms, or width of halls and sidewalks.</p>	<ul style="list-style-type: none"> • A door knob that cannot be twisted by a person with limited mobility and strength, such as someone with arthritis. • A hallway or door that is too narrow for a person who uses a wheelchair to pass through safely.
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Pathways’ Internal Policies

Pathways to Education underwent a thorough audit, update, and training of our Human Resources and core internal policies in November 2023 in order to ensure we remain not only compliant, but that we have policies that are effective, easy to understand, and ensure the fair treatment of all people.

We will continue to review and update policies as required in order to continue to achieve this goal. This is an important part of our multi-year accessibility plan (MYAP).

Pathways’ Multi-Year Accessibly Plan

Our MYAP can be found in the appendix of this document.

Section One lists what our organization has done to remove and prevent barriers to accessibility.

Section Two are the strategies we will put in place to meet Ontario’s accessibility laws and to remove and prevent barriers.

Posting of the Multi Year Accessibility Plan (MYAP)

Externally, Pathways MYAP has been posted to our corporate website at www.pathwaystoeducation.ca for access by the general public.

Internally, all new hires must review a variety of policies and training including in the area of Accessibility. All employees sign a code of conduct acknowledging their familiarity, and agreement to abide by, organizational policies.

Updates in terms of progress against the Pathways MYAP will be posted both internally as well as on our corporate website.

Review and Reporting of the MYAP

Pathways' progress against our MYAP is assessed by the organization's Joint Health & Safety Committee, and the Senior Leadership Team, on at least an annual basis. To ensure this happens, a review of the plan has been built into our existing corporate and strategic business cycle.

Pathways will ensure compliance with legislation by filing an accessibility report every 3 years at www.ontario.ca/ACCESSION.

Our MYAP can be found in the appendix of this document.

Standard of Accessibility Under AODA

General Requirements

Pathways recognizes that in order to create an accessible and barrier free environment, the core principles of accessibility regulations and guidelines must not only be incorporated but implemented throughout our training, policies, and best practices. Pathways has created accessibility plans, policies, and trainings that emphasize an inclusive setting for all individuals.

Activity	Status
Create a multi-year plan outlining Pathways strategy to prevent and remove barriers. Meet requirements set out by IASR ON Regulation 191/11. Make ongoing revisions and update and publish a new plan every 5 years.	2023 MYAP – Complete Next Update – 2028
Establish and maintain a policy that sets out to govern the Pathway organization and all associated, that will meet IASR standards. Make it publicly available.	Complete Newest Version as of Mar 2023
Deliver training to all employees, volunteers, individuals associated with Pathways through informative videos and modules, along with a test employees are required to pass. (https://aoda.ca/free-online-training/).	2023 Training – complete for all existing employees. Ongoing for new hires.
Have HR maintain record of employee training, certificates, and all signed documents; including dates and number of employees trained.	2023 Tracked Training – complete for all existing employees. Ongoing for new hires.
Incorporate accessibility criteria, features, and design when procuring goods, services or facilities that aid in accessibility, where it is practicable.	Ongoing

Information and Communication Standards

Pathways commits to ensuring organizational information and communications are accessible to all parties in numerous ways. When developing, implementing, and maintaining information, Pathways strives to diversify and incorporate the most efficient and effective ways for individuals with disabilities to access information. This includes, but is not limited to, telephone and in-person communication, various communication materials, and use of technology.

Activity	Status
Establish processes for receiving and responding to feedback that are accessible to people with disabilities. Have contact information and ways for the public to relay feedback about various processes and accessibility.	Complete Feedback Guide – See Below
Have emergency plans and procedures, along with public safety information in accessible formats upon request.	Complete
Upon request, be able to provide information in accessible formats or communication support for a person with disabilities, in a timely manner. Make it known that there are accessible communication formats for various needs.	Complete/Ongoing
Make sure your accessibility plan is posted on your website for all interested parties to read.	Complete

Employment Standards

Pathways is committed to fair and accessible employment practices that attract and retain employees of all abilities. Pathways strives to accommodate any request to aid in accessibility for employment or recruitment of a person with disabilities.

Activity	Status
Notify employees and outside parties that accommodations are available for any applicants during the recruitment process.	Complete/Ongoing
All successful applicants, regardless of status, are notified about Pathways' policies for accommodation for employees with disabilities.	Complete/Ongoing
Inform all employees about Pathways' accessibility policies and procedures.	Complete/Ongoing

All employees will be given any updated information regarding accessibility when policies, plans, or procedures have been revised.	Complete/Ongoing 2023 Rollout – December 2023
Consult with employees and clients who have disabilities to provide them with accessible communication and formats they require to be successful.	Complete/Ongoing
Develop individual accommodation plans for employees with disabilities. Each plan will be unique to an individual and include information on accessibility formats, communication supports required, emergency plans, other accommodations, and feedback.	Complete/Ongoing
Establish a process that outlines the steps that will be taken to help employees return to work when they have been absent because of a disability or need accommodation to return to work.	Complete/Ongoing
Provide individualized workplace emergency response information to staff with disabilities.	Complete/Ongoing

Design of Public Spaces

Pathways is committed to maintaining public spaces in accordance with the Accessibility Standard for Design of Public Spaces

Activity	Status
Continue to improve public spaces to meet accessibility criteria, when practical. Where applicable, meet requests to comply with an individual's disability, to provide and accessible and accommodating space.	Complete/Ongoing

Customer Service

Pathways is committed to providing accessible and inclusive customer service. Pathways will provide goods and services to everyone with the same quality and efficiency.

Activity	Status
Establish and maintain a policy governing the provisions of goods, services, and facilities to persons with disabilities. This includes: service animals, supports persons, assistive devices, notice of disruptions, etc.	Complete Customer Service Policy
Develop a process to receive and respond to feedback about customer service that is accessible to persons with disabilities. Notify the public about the feedback process; website or informative emails/hardcopies.	Complete Feedback Information Below
Deliver training about provisions to goods, services, and facilities to persons with disabilities, to all employees, volunteers, and individuals who provide these on behalf of Pathways.	Complete/Ongoing for new employees
Maintain record of training, including name of employee, date of completion, certificates, and number of employees trained.	Complete/Ongoing for new employees
Upon request, provide or arrange for information in various accessible formats or communication supports. Provide customers with notice in the event of a planned or unexpected disruption in services or facilities used by persons with disabilities with all the information required.	Complete/Ongoing Provided on Pathways Website

Pathways' AODA Policies

Policy Number:	610.3.7
Policy Name:	AODA – Customer Service Policy
Policy Created Date:	January 2019
Policy Revised Date:	January 2024
Effective Date:	January 2024
Approved By:	President & CEO
Last Review Date:	August 2023
Next Review Scheduled:	December 2024
Policy Owner:	Director, Talent Management

1.0 Purpose

Pathways to Education Canada is committed to fostering an inclusive workplace that provides an accessible environment for all employees, job applicants, suppliers, and visitors who may enter our premises, access our information, or use our services.

This policy has been established to support this commitment and meet the requirements of the Integrated Accessibility Standards for Customer Service which addresses the provision of goods and services to the public or other third parties.

This policy is current to the most recent 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 meet or exceed 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 (Ontario) 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 (3) months of employment and ongoing as changes to Pathways Canada's accessibility policies occur.
- **Review AODA Policies**
This policy will be reviewed annually 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
- Considering 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 their 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 times.

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 analyze 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.

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 (Ontario), 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 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 was 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

Pathways AODA – Information, Communications and Employment Policy

Pathways 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.

Barrier – any obstacle, including anything physical, architectural, technological or attitudinal, based on information, communications or result of a policy or a practice that hinders the full and equal participation in society of persons with a disability, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

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 with current and prospective donors to secure funding, working with other community or government stakeholders 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.

Policy Number:	610.3.6
Policy Name:	AODA – Integrated Accessibility Standards Regulation – Information, Communications, and Employment
Policy Created Date:	January 2019
Policy Revised Date:	January 2024
Effective Date:	January 2024
Approved By:	President & CEO
Last Review Date:	August 2023
Next Review Scheduled:	December 2024
Policy Owner:	Director, Talent Management

1.0 Purpose

Pathways to Education Canada is committed to fostering an inclusive workplace that provides an accessible environment for all employees, job applicants, suppliers, and visitors who may enter our premises, access our information, or use our services.

This policy has been established to govern the provision of standards under the Integrated Accessibility Standards Regulation (Regulation 191/11) (IASR) to increase accessibility for persons with disabilities specifically in the areas of:

- Information and Communications
- Employment

This policy is current to the most recent (July 1, 2016) changes to accessibility legislation.

2.0 Policy Scope

This policy applies to all employees of Pathways Canada.

3.0 Definitions

A list of definitions can be found in Appendix A.

4.0 Policy Statement and Guidelines

As an organization, Pathways Canada strives to provide an accessible and welcoming environment for everyone by identifying and removing barriers in our workplace and ensuring that new barriers are not created. The organization respects and complies with the requirements of the *Accessibility for Ontarians with Disabilities Act, 2005*, and its associated regulations. Pathways Canada ensures that persons with disabilities are provided with equal opportunities. We are committed to meeting the needs of individuals with disabilities in a timely and integrative manner that respects their dignity and independence.

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 (Ontario) 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 it is reasonably practical, but no later than within the first three (3) 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.

REQUIREMENTS FOR INFORMATION AND COMMUNICATION STANDARDS

Pathways Canada is committed to ensuring that all the applicable information and communication requirements of the Integrated Accessibility Standards, Ontario Regulation 191/11 (IASR) are met. They include the following:

Accessible Formats and Communication Supports

Upon request and consultation, Pathways Canada will endeavor to provide or arrange for the provision of accessible formats and communication supports for persons with disabilities under the Organization's control. Accessible formats and communication supports will be provided in a timely manner and at no additional cost to the individual.

Pathways Canada will consider the person's accessibility needs when customizing individual requests and shall consult with the individual making the request to ensure suitability.

Pathways Canada will make the availability of accessible formats and communication supports publicly known.

Feedback Processes

Pathways Canada will ensure that all feedback processes (internal and external) are made available to clients/customers and employees upon request. In accordance with customer service standards, Pathways Canada will make known the availability of accessible feedback formats.

REQUIREMENTS FOR EMPLOYMENT STANDARDS

All employment requirements related to the following will be in accordance with the Integrated Accessibility Standards, Ontario Regulation 191/11 (IRASR):

- Recruitment, Assessment and Selection
- Accessible Formats and Communication Supports for Employees
- Workplace Emergency Response Information
- Performance Management and Career Development and Advancement
- Redeployment

Recruitment, Assessment, and Selection

Pathways Canada will notify its employees and external applicants about the availability of accommodation for applicants with disabilities in its recruitment process.

Pathways Canada will ensure that job applicants are notified when they are individually selected to participate in the assessment or selection process and that accommodations for disabilities are made available upon request in relation to the materials or processes to be used.

Pathways Canada will consult with individuals who request accommodations and will provide for appropriate accommodations.

When presenting offers of employment, Pathways Canada will notify the successful applicant of its policies for accommodating employees with disabilities.

Informing Employees of Supports

Pathways Canada will ensure that employees are informed of all accessibility policies (and any updates to those policies) used to support employees with disabilities, including policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability. This information will be provided to new employees as soon as practical after commencing employment.

Accessible Formats and Communication Supports for Employees

Upon request of an employee with a disability, Pathways Canada will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information that is needed to perform their job, and information that is generally available to other employees.

Workplace Emergency Response Information

Where required, Pathways Canada 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 if Pathways Canada is aware of the need for accommodation due to the employee's disability.

The individualized workplace emergency response information will be reviewed when:

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

Performance Management and Career Development and Advancement

Pathways Canada will consider the accessibility needs of employees with disabilities when implementing performance management processes, or when offering career development or advancement opportunities. Individual accommodation plans will be consulted, as required.

Redeployment

The accessibility needs of employees with disabilities will be taken into account in the event of redeployment. Individual accommodation plans will be consulted, as required.

Questions

This policy has been developed to break down barriers and increase accessibility for persons with disabilities related to employment at Pathways Canada. Questions about the policy, or if further information is needed to understand the policy, explanations will be provided by the Human Resources Department.

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

Pathways AODA – Customer Service Policy
 Pathways Hiring Policy
 Pathways 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.

Barrier – any obstacle, including anything physical, architectural, technological or attitudinal, based on information, communications or result of a policy or a practice that hinders the full and equal participation in society of persons with a disability, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment or a functional limitation.

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.

Performance Management – Activities related to assessing and improving employee performance, productivity, and effectiveness with the goal of facilitating employee success.

Redeployment – The reassignment of employees to other departments or jobs within the organization as an alternative to layoff, when a particular job or department has been eliminated by the organization.

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 with current and prospective donors to secure funding, working with other community or government stakeholders 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 material 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.

Pathways to Education Canada - Multi-Year AODA Plan

Action Item	AODA Standards and Regulation Reference	Actions and Deliverables	Completion Date (Year Ending)					Responsible
			2023	2024	2025	2026	2027	
Part 1 General Requirements								
1	Establish Integrated Accessibility Standard Regulations (IASR) policy and multi-year accessibility plan	A) Create Accessibility policy and have it signed and approved by Executive team. B) Ensure all employees sign off that they have read and agree to abide by the Accessibility policy.	x					HR
2	Establish a multi- year accessibility plan	A) Create plan; reviewed and approved by Executive team. B) Review and update plan at least every 5 years.	x				x	HR
3	Train all employees	A) Ensure all employees complete AODA training. Employees provide certificate for HR file and HR tracks to ensure completion by all.	x	x	x	x	x	HR
Part 2 Information and Communication Standard								
4	Establish feedback process	Ensure all existing and new processes for receiving and responding to feedback are accessible to persons with disabilities by providing or arranging to provide accessible formations and communication supports upon request. Members of the public will be notified about the availability of communication supports.	x					Mktg
5	Accessible formats and communication support	Ensure requests for accommodation support are dealt with in a timely manner. Continue to integrate new communication methods.	x	x	x	x	x	Mktg
6	Accessible emergency information	Provide employees with disability with information related to emergency response	x	x	x	x	x	HR
7	Company website and web content conform to Accessibility Guidelines	Update website as required	x	x	x	x	x	TECH
Part 3 Employment Standards								
8	Review policies and practices with respect to recruitment, hiring and interviewing per Employment Standards requirements.	Ensure policies and practices include accessibility considerations; notify employees and public about availability of accomodation; notify applicants of availability of accomodateion during the assessment and selection process.	x	x	x	x	x	HR
9	Recruitment, assessment, selection process	Notify applicants of availability of accommodation during the assessment and selection process.	x	x	x	x	x	HR
10	Onboarding: policy notification	Notify new hires of availability of accommodation during onboarding	x	x	x	x	x	HR
11	Updates to accesibity policies	Notify all employees and public regarding any changes or revisions to the accessibility policies and plans	x				x	HR/Mktg
12	Individual accomodation plans	Process and develop individualized accomodation plans, specialized to each persons with a disability	x	x	x	x	x	HR
13	Return to work	Have a return to work plan for any applicable individual (returning from disability related leave)	x	x	x	x	x	HR
Part 4 Public Spaces								
14	Incorporate the design of public spaces regulation, as applicable, to the business	Continue to seek ways to improve spaces to maximize accessibility					x	Ops
Part 5 Barrier identification								
15	Attitudinal barriers may result in people with disabilities being treated differently than people without disabilities.	Continue to identify and eliminate barriers with the help of employees, policies, plans, and training	x	x	x	x	x	HR
16	Informational and communication barriers arise when a person with a disability cannot easily receive and/or understand information that is available to others.	Continue to identify and eliminate barriers with the help of employees, policies, plans, and training	x	x	x	x	x	HR
17	Technological barriers occur when technology or the way it is used does not meet the needs of people with disabilities	Continue to identify and eliminate barriers with the help of employees, policies, plans, and training	x	x	x	x	x	Tech
18	Systemic barriers in policies, practices and procedures result in people with disabilities to being treated differently than others or sometimes excluded altogether	Continue to identify and eliminate barriers with the help of employees, policies, plans, and training	x	x	x	x	x	HR
19	Physical and architectural barriers occurs in the environment and prevent access for people with disabilities.	Continue to identify and eliminate barriers with the help of employees, policies, plans, and training	x	x	x	x	x	Ops