

# Accessibility for Ontarians with Disabilities Act Accessibility Plan

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## Message from the Provincial Advocate

All public sector and broader public sector organizations are required by law to have an annual accessibility plan and to make it available to the public. The Advocate's Office is committed to improving accessibility by identifying, removing and preventing barriers in key areas of customer service, employment, communications and information, and the built environment.

At the Advocate's Office, we are continuously seeking ways to effectively respond to the needs of people with disabilities who come into contact with our office whether they are staff, members of the public or elected officials.

If you have any comments or concerns, I encourage you to contact the office directly using the contact information provided below.

Sincerely,

A handwritten signature in black ink, appearing to read 'Irwin Elman', written in a cursive style.

Irwin Elman  
Provincial Advocate for Children and Youth

## Section 1: Introduction

### Advocate's Office statement of commitment:

The Office of the Provincial Advocate for Children and Youth (Advocate's Office) supports the full inclusion of persons with disabilities as set out in the United Nations' *Convention on the Rights of Persons with Disabilities*, the Canadian *Charter of Rights and Freedoms*, the Ontario *Human Rights Code*, the Advocate's Office's own policies and guidelines on disability and the duty to accommodate, the *Ontarians with Disabilities Act (ODA) 2001* and the *Accessibility for Ontarians with Disabilities Act (AODA) 2005*. The Advocate's Office is committed to complying with the accessibility standards set out in the AODA's *Integrated Accessibility Standards Regulation (IASR)* and the *Accessibility Standards for Customer Service Regulation*.

Regulations under the [\*Accessibility for Ontarians with Disabilities Act, 2005 \(AODA\)\*](#) include accessibility standards in:

- Customer service
- Information and communications
- Employment
- The Built Environment
- Procurement

The [\*Integrated Accessibility Regulation \(IASR\)\*](#) under the AODA was enacted in June 2011. Section 4(1) of the IASR requires the Government of Ontario and designated public sector organizations, including the Advocate's Office, to create, maintain and make publicly available a multi-year accessibility plan. The accessibility plan must be created, reviewed and updated in consultation with persons with disabilities. The multi-year accessibility plan must also be reviewed at least once every five years, and all organizations are required to prepare an annual status report on the progress that the organization has made to implement their accessibility plan and comply with the IASR. The status reports must be made available to the public.

As part of its mandate the Office of the Provincial Advocate for Children and Youth (Advocate's Office) works to ensure that the rights and advocacy issues of children and youth with disabilities who are involved with or are in the systems of care are met. Each year, the Advocate's Office sets a course to prevent, identify and remove barriers for persons with disabilities who seek and receive services and/or work for our Office. While we are not associated with the Ontario Public Service (OPS), the Advocate's Office has previously submitted its Accessibility plan, as required under the [\*Ontarians with Disabilities Act, 2001 \(ODA\)\*](#).

The Advocate's Office has its own commitments to accessibility. We are guided by our policies and guidelines on disability and the duty to accommodate. As an Office challenged to be a

leader in the area of youth participation, the Advocate's Office strives to provide leadership in accessibility for young people in this province. Our goal is to ensure accessibility for our employees, young people and the public who seek and receive advocacy services.

This document outlines the steps the Advocate's Office has taken and plans to take during the following five years (2014-2019) to:

- prevent and remove barriers for persons with disabilities
- meet the standards set out in the *Accessibility for Ontarians with Disabilities Act, 2005* and its regulations.

## Section 2: Current accessibility policies, practices, facility and service features

### General

The Advocate's Office works to advance the understanding of the duty to accommodate and accessibility for all the children and youth we serve.

Systems and practices are already in place to help the Advocate's Office comply with the requirements under the AODA, the [Accessibility Standards for Customer Service, Ontario Regulation 429/07](#), the [Integrated Accessibility Standards, Ontario Regulation 191/11](#) and the *Human Rights Code*.

### Customer Service

- All staff receive training on disability-related policies and procedures, including AODA mandatory training on providing accessible customer service to persons with disabilities.
- Internal policies and procedures for providing goods and services to people with disabilities, as required under Section 3 of the AODA Accessibility Standards for Customer Service Standards Regulation.
- Communications supports including ASL interpretation are provided at Advocate's Office-hosted public events; other forms of accommodation are available upon request
- All Advocate's Office-hosted public events take place at accessible locations. A member of the project team visits each proposed event space to make sure that it is fully accessible.
- Standard language on all invitations invites people to contact the Advocate's Office about additional accommodation requests before event dates.
- As required under Section 7 of the AODA Accessibility Standards for Customer Service Regulation, a web-based feedback process is available to help the Advocate's Office better understand how well customer expectations are being met. People can also provide feedback via telephone, TTY, mail, e-mail or fax.
- Promote and encourage staff to complete the diversity and inclusion training offerings.
- Develop a list of Advocate's Staff and vendor resources with American Sign Language (ASL) and French ASL (LSQ) training to ensure translation service providers are available for the Office staff and to act as translators where needed in our mandated work.
- Developing a supplier's list and manager's guide for the acquisition of supportive technologies to accommodate staff with disabilities.
- Reviewing and updating policies and standards regularly to ensure high quality, accessible customer service
- Consulting with key stakeholders and advisory groups on emerging or changing requirements.
- Embedding accessibility requirements into staff training and orientation materials
- Reviewing customer feedback and taking appropriate action.

## Information and Communications

- The Advocate’s Office is currently developing and will launch a new website in 2018 that will also comply with the World Wide Web Consortium (W3C) Web Content Accessibility Guidelines (WCAG) 2.0, Level AA ([www.provincialadvocate.on.ca](http://www.provincialadvocate.on.ca)).
- Staff are provided with specialized training on emerging technologies, designing accessible e-learning modules, and other topics to improve the accessibility of the Advocate’s Office’s online resources.
- Staff routinely take steps to make sure that the organization’s website and communications products are as accessible as possible, including:
  1. The tools and products that are used to develop the website and other online materials have built in accessibility features
  2. Web developers and any other external vendors are selected, in part, based on their experience designing accessible websites
  3. Any online materials, such as e-learning modules, are tested regularly during their development and are tested on an ongoing basis by staff and by external contacts who have disabilities.
- The Advocate’s Office provides a TTY number for communication with people who are deaf, deafened or hard of hearing.
- The Advocate’s Office utilizes Skype – a web-based video service to further support the ability of young people from the Deaf communities to access the Office through a video link system.
- The Advocate’s Office uses a range of communication methods such as email and social media platforms to communicate with stakeholders and communities.
- Developing guidelines and best practices for creating accessible documents for common desktop applications such as MS Word, Excel and PowerPoint.
- All public documents including correspondence and publications are available in accessible digital formats, including accessible PDFs for all new publications. Captioning and transcripts are provided for video content.
- All staff are expected to use plain language to write publications, documents, training materials and correspondence. Assistance with plain language editing is available for all Advocate’s Office policies and publications.

## Employment

- The Advocate’s Office follows the OPS’ Employee Accommodation and Return to Work Guidelines and operating policies for developing and documenting individual accommodation plans, return-to-work plans and workplace emergency response information for employees with disabilities.
- The Orientation Manual for new Advocate’s Office employees includes information about employees’ rights and responsibilities under the *Ontario Human Rights Code* and the AODA that foster an inclusive workplace. These include the Advocate’s Office’s policies on Human Resources and Management, Safety and Risk Management as well as policies on providing goods and services to people with disabilities.

- Develop accessibility educational sessions for staff on the AODA regulations and the Human Rights Code and link both to our orientation to advocacy training.
- Launch training for managers to increase knowledge on providing accommodation for employees with disabilities.
- Let applicants know that we will accommodate disabilities during the selection process. If a job applicant requests accommodation, we consult with them and make adjustments that best suit their needs.

### The Built Environment

- Continue to assess and make plans to improve the accessibility of our Offices, facilities and technology with a view to improving accessibility for staff and those seeking advocacy resources from our Office.
- The Advocate's Office will continue to model best practices when undertaking accessibility retrofits of existing facilities.

### Procurement

- Conducting regular reviews and updates of procurement-related directives, policies, procedures and standards.
- Consulting with key stakeholders, advisory groups and vendors on promoting awareness of accessibility issues.
- Embedding accessibility requirements into the procurement process.
- Conducting reviews to ensure compliance and continuous improvement in procurement practices.
- Reviewing feedback on the procurement process and taking appropriate action as needed.

## Key Terms

**Accessibility:** a general term used to describe the degree of ease that something (e.g., device, service, environment) can be used and enjoyed by persons with a disability. The term implies conscious planning, design and/or effort to ensure it is barrier-free to persons with a disability and, by extension, highly usable and practical for the general population as well.

**Accessibility for Ontarians with Disabilities Act (AODA), 2005:** the purpose of the Act is to develop, implement and enforce accessibility standards in order to remove barriers for Ontarians with disabilities on or before January 1, 2025 in relation to goods, services, facilities, accommodations, employment, facilities, structures and premises. The AODA came into force on June 4, 2005.

**Accessible:** that which can be easily reached or obtained; a facility that can be easily entered; posing no obstacles to persons with disabilities.

**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.

**Adaptive technologies:** technologies that enable persons with disabilities, primarily physical disabilities, to use regular versions of products such as computers or telephones.

**Assistive devices:** equipment that assists people to perform a given task; usually devices that people bring with them, such as a walker, scooter, wheelchair or personal oxygen tank.

**Assistive technology:** technological devices that have been developed with features specifically helpful for people with disabilities. Publishers may be asked to supply file formats that are compatible with particular types of assistive technology.

**Communications:** the interaction between two or more persons or entities, where information is provided, sent or received.

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

**Conversion ready:** an electronic or digital format that facilitates conversion into an accessible format.

**Disability:** the interaction between the social, cultural or physical environment and a person's impairment that creates barriers. Disability may be apparent to others or hidden, inherited, self-inflicted or acquired, perceived or presumed.

**Diversity:** refers to the presence of a wide range of human qualities and attributes within a group or an organization. The dimensions of diversity include, but are not limited to, age, gender, race, ethnicity, physical and intellectual ability, religion, sexual orientation, educational background and expertise.

**HTML/XHTML (HyperText Markup Language):** the markup language for web pages and provides the basic building blocks of web pages. XHTML is a set of XML specifications that extend the rather limited capabilities of HTML and make it more disciplined. Both HTML 5.0 and XHTML 5.0 are currently under development by the World Wide Web Consortium.

**Information:** includes data, facts and knowledge that exists in any format, including text, audio, digital or images, and that conveys meaning.

**LSQ** - Langue des signes québécoise

**Ontarians with Disabilities Act (ODA), 2001:** requires government ministries, municipalities and public sector organizations such as transportation organizations, hospitals and school boards to develop an annual accessibility plan aimed at identifying, removing and preventing barriers to accessibility in a number of areas, such as government buildings, publications and internet sites.

**Skype** - Video chat and instant messaging application used by the Deaf community

**PDF (Portable Document Format):** a file format, which enables a document to be used on many different computer platforms but always to maintain the same visual appearance and page layout. Originally developed by Adobe in the early 1990s, PDF is now an ISO standard and is widely used throughout the publishing industry both as part of its process for producing printed products and for some types of electronic products. The specifications of PDF files may vary depending on their intended use; some forms of PDF (particularly those specifically aimed at printing applications) are far from ideal for use in the production of accessible editions.

**RFP** - Request for Proposal

**TDD**- Telecommunication Device for the Deaf

**TTY** – Tele Typewriter

**WCAG** - Web Content Accessibility Guidelines

## Accessible Customer Service Plan

### Providing Goods and Services to People with Disabilities

#### 1. Our mission:

The mission of the Provincial Advocate for Children and Youth (the “Advocate’s Office”) is to ensure that children and youth in state care and the margins of state care in Ontario are able to voice their concerns about their lives and the services they receive. We advocate to ensure their voices are heard and systems respond accordingly. Our vision is that the voices, rights and dreams of children and youth inspire and drive everything we do.

The Advocate’s Office supports the full inclusion of persons with disabilities as set out in the United Nations’ Convention on the Rights of Persons with Disabilities, the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code, the *Ontarians with Disabilities Act (ODA) 2001* and the *Accessibility for Ontarians with Disabilities Act (AODA) 2005*. The Advocate’s Office is committed to complying with the AODA Accessibility Standards for Customer Service and providing high quality service where all persons have equal access to its services.

#### 2. Our commitment to service:

In fulfilling our mission, the Advocate’s Office continuously works to provide our goods and services in a way that respects the dignity and independence of people with disabilities. The Provincial Advocate and staff are committed to giving people with disabilities equal opportunity to access our goods and services and to allowing them to equally benefit from the same services, in the same place and in a similar way as other customers.

Our ongoing Commitment to Service is:

We, the staff of the Advocate’s Office, in full compliance with the spirit, intent and provisions of the *Provincial Advocate for Children and Youth Act, 2007*, are committed to providing the highest quality service to the children and youth we serve.

This statement of our commitment reflects our best efforts to provide excellent customer service, within the limits of our resources, by:

1. being sensitive, aware and knowledgeable about the realities of prejudice and discrimination;
2. recognizing and accommodating the diverse needs of our many client groups;
3. providing accessible services, information and materials;
4. acting on issues brought to the Advocate’s Office as quickly as possible while maintaining the high quality of our work; and
5. responding to questions, concerns and criticism in a prompt, fair and respectful way.

### **3. Providing goods and services to people with disabilities:**

The Advocate's Office is committed to excellence in serving all children and youth, including those with disabilities, and will carry out our functions and responsibilities in an accessible manner. Each request for accommodation is assessed on a case-by-case basis. In addition we follow these steps:

#### **3.1 Communication:**

We communicate with people with disabilities in ways that take their specific needs into account. We train staff how to interact and communicate with people with various types of disabilities.

We train staff to communicate with children and youth over the telephone in clear and plain language and to speak clearly and slowly. If communication over the telephone is not suitable or available, the Advocate's Office will offer to communicate with children and youth in other ways including email, TTY and relay services.

The Advocate's Office will arrange and pay for sign language interpretation, captioning or other disability-related communication services for its meetings and public events, in advance or upon request depending on the audience. (Any requests should be made as early as possible due to the high demand for these types of services across the province.)

#### **3.2 Assistive devices:**

The Advocate's Office ensures our staff are trained and familiar with various assistive devices that may be used by customers while accessing our goods or services.

The Advocate's Office only uses facilities for meetings and public events that are accessible for people with disabilities who use mobility aids and devices or have other facility-related needs.

Customers are encouraged to contact the Advocate's Office (or staff or manager involved) as early as possible if any special arrangements are required.

#### **3.3 Accessible documents:**

All of the Advocate's Office public documents, including correspondence and publications, are available in electronic format. Advocate's Office publications are released simultaneously in electronic format and made available on our website [www.provincialadvocate.on.ca](http://www.provincialadvocate.on.ca) which meets W3C Web Content Accessibility Guidelines.

# Provincial Advocate *for Children & Youth*

All documents created by the Advocate's Office are available, upon request, in other alternate formats, such as Braille, to accommodate disability-related needs. The Advocate's Office will inform the individual when the document will be available in the requested format.

#### **4. Use of service animals and support persons:**

We welcome people with disabilities who are accompanied by a service animal or a support person. We will ensure that staff are properly trained on how to interact with people with disabilities who are accompanied by a service animal or a support person.

#### **5. Notice of temporary disruption:**

The Advocate's Office will inform customers if there is a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. This notice will include information about the reason for the disruption, how long it may last, and what other facilities or services are available.

This information will be placed on our website, on our automated phone system and at the entrance to our offices on the 22nd Floor at 401 Bay Street, Toronto and 435 Balmoral Street, Thunder Bay. If visitors are expected, we will do our best to let them know about any disruption including waiting outside the offices for those visitors to help them as needed.

#### **6. Training for staff:**

The Advocate's Office provides training for all staff so that they understand this policy, the Accessibility Standards for Customer Service, how to interact and communicate with people with disabilities and how to respond to requests for accessibility and accommodation.

The Advocate's Office will maintain and update a training package for all current and future staff.

#### **7. Feedback process:**

The Advocate's Office strives to meet and surpass customer expectations while serving customers with disabilities. Comments on our services regarding how well those expectations are being met are appreciated.

Feedback may be made in writing, by telephone, TTY or email to the:  
Office of the Provincial Advocate for Children & Youth  
401 Bay Street, Suite 2200  
Toronto, Ontario  
M7A 0A6

# Provincial Advocate *for Children & Youth*

Telephone: 416-325-5669

Fax: 416-325-5681

Toll Free: 1-800-263-2841

TTY: 416-325-2648

Email: [advocacy@provincialadvocate.on.ca](mailto:advocacy@provincialadvocate.on.ca)

The Provincial Advocate or a delegate will review the customer feedback, investigate the situation, attempt to resolve it and provide a response within 14 business days of receiving the information.

Note: Complaints will be addressed according to the Advocate's Office complaint procedures.

## **8. Modifications to this or other policies:**

We are committed to developing customer service policies that respect and promote the dignity and independence of people with disabilities. Therefore, no changes will be made to this policy before considering the impact on people with disabilities.