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## ACCESSIBILITY POLICY

At CDSPI, we are committed to fostering an inclusive, accessible environment, where all employees and customers feel valued, respected and supported. We are dedicated to building a workforce that reflects the diversity of our customers and communities in which we live and serve. If you require an accommodation for the recruitment/interview process (including alternate formats of materials, or accessible meeting rooms or other accommodation), please let us know and we will work with you to meet your needs. CDSPI and CDSPI Advisory Services Inc (CASI) are separate legal entities operating within the same premises. Both organizations are bound by the same policies and procedures. In this policy, the term “CDSPI” will represent both organizations (CDSPI and CASI).

### PURPOSE

Under the [Accessibility for Ontarians with Disabilities Act, 2005](#) (AODA), all organizations must meet the requirements of accessibility standards established by the Integrated Accessibility Standards Regulation (IASR). This regulation establishes the accessibility standards for each of customer service, information and communications, employment, and the design of public spaces.

CDSPI's Accessibility Policy and Statement of Commitment provide guidance to the delivery of services to people with disabilities, in compliance with the requirements of provincial legislation outlined in the AODA and IASR. This policy shall apply to every person who deals with our clients including all CDSPI staff, volunteers, and third party contractors who deal with the public on behalf of CDSPI.

CDSPI is committed to reducing/eliminating barriers in its environment for staff, clients and customers with disabilities as well as providing services to these individuals in accordance with the requirements of all Human Rights legislation and provincial legislation such as AODA, and in a manner that respects the dignity and independence of persons with disabilities. As legislation changes and develops, CDSPI will review, and change as necessary, its policies, practices and procedures to reflect any changes made in legislation.

To achieve this goal, CDSPI will strive to take the following steps:

- Identification of Barriers
- Removal of Identified Barriers
- Prevention of Barriers
- Increase Awareness of Accessibility Initiatives at all levels of the organization
- Promotion of compliance policies and procedures with respect to accessibility to both staff and clients

### STATEMENT OF COMMITMENT

CDSPI's goal is to deliver exceptional customer service that exceeds clients' expectations. We strive at all times to provide our programs, products and services in a way that respects the dignity and independence of people with disabilities. We are also committed to giving people with disabilities the same opportunity to access our programs, products and services and allowing them to benefit from the same services, in the same place and in a similar way as other clients.

### TRAINING

CDSPI will provide training to:

- all employees and volunteers;
- all persons who provide goods, services or facilities to customers on behalf of CDSPI;
- all persons involved in developing policies for our organization.

Training for new staff members will occur as part of CDSPI's orientation training for new staff, and will be provided as soon as practicable. Ongoing training will be provided in connection with changes to this policy. CDSPI will maintain training records.

Training will include:

- Overview of the Accessibility for Ontarians with Disabilities Act;
- Accessibility requirements from the Integrated Accessibility Standards Regulation;
- [The Human Rights Code](#) as it pertains to persons with disabilities;
- Changes that are made to the accessibility policy

## DEFINITIONS

**“Accessible Formats”** May include, but are not limited to, large print, recorded audio and electronic formats, Braille and other formats usable by persons with disabilities,

**“Assistive Device”** Any auxiliary aid such as communication aids, cognition aids, personal mobility aids and medical aids (e.g., canes, crutches, wheelchairs, or hearing aids, etc.),

**“Barrier”** Anything that stops a person with a disability from fully taking part in society because of that disability, including: a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, and a policy or practice,

**“Communications”** The interaction between two or more persons or entities, or any combination of them, where information is provided, sent or received,

**“Communication Supports”** May include, but are not limited to, captioning, alternative and augmentative communication supports, plain language, sign language and other supports that facilitate effective communications,

**“Disability”** The AODA uses the same definition of disability as the Ontario Human Rights Code. It is the definition that applies to the Customer Service Standard. The definition recognizes visible and non-visible disabilities, and includes any degree of physical disability, vision, sensory, intellectual or developmental, learning, mental health disabilities and multiple disabilities. The definition includes disabilities of different severity, and disabilities the effects of which may come and go,

**“Feedback”** Clients' comments regarding the manner in which we provide programs, products and services,

**“Information”** Includes data, facts and knowledge that exists in any format, including text, audio, digital or images and that conveys meaning,

**“Service Animal”** An animal is a service animal for a person with a disability (a) if it is readily apparent that the animal is used by the person for reasons relating to his or her disability; or (b) if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons related to disability,

**“Support Person”** In relation to a person with a disability, another person who accompanies him or her in

order to help with communication, mobility, personal care or medical needs or with access to goods, services or facilities.

## **CUSTOMER SERVICE STANDARDS**

### **ESTABLISHMENT OF POLICIES**

We shall develop, implement and maintain policies governing our provision of goods, services or facilities, to persons with disabilities.

We will use reasonable efforts to ensure that the policies are consistent with the following principles:

- Our goods, services or facilities will be provided in a manner that respects the dignity and independence of persons with disabilities.
- Our provision of goods, services or facilities to persons with disabilities will be integrated with the provision of goods, services or facilities to others, unless an alternative measure is necessary, whether temporarily or on a permanent basis, to enable a person with a disability to obtain, use or benefit from our goods, services or facilities.
- Persons with disabilities will be given an opportunity equal to that given to others to obtain, use and benefit from our goods, services or facilities;
- When communicating with a person with a disability, we shall do so in a manner that takes into account the person's disability.

### **ASSISTIVE DEVICES**

We are committed to serving people with disabilities, who use assistive devices to obtain, use or benefit from our products and services and as such, clients are free to use their personal assistive devices in CDSPI environment. We will not interfere with assistive devices without permission of the owner or user.

Typical devices that clients may use include:

- communication devices
- teletypewriters
- voice amplifiers
- voice output communication aids
- writing aids, and/or
- voice prostheses

CDSPI offers additional measures that may assist our clients while on site and we will ensure that our staff are familiar with the various assistive devices that may be used by clients including: elevators, wheelchair ramps and automatic doors.

### **COMMUNICATION**

We will communicate with people with disabilities in ways that take into account their disability. We will train staff who communicate with customers on how to interact and communicate with people with various types of disabilities.

### **TELEPHONE SERVICES**

We are committed to providing fully accessible telephone interface to our clients and potential clients. We will train staff to communicate with customers over the telephone in clear and plain language and to speak clearly and slowly if required by the customer. We will offer to communicate with customers using email or face-to-face meetings if telephone communication is not suitable to their communication needs or is not available.

### **DOCUMENTATION**

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All published documents can be available in hard copy, large print and email if requested.

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## **BILLING AND STATEMENTS**

We are committed to providing accessible invoices and statements to all of our clients. We will answer any questions customers may have about the content of the invoice or statement in person, by telephone or email.

## **SERVICE ANIMALS**

We will accommodate the use of service animals by people with disabilities who are accessing our services and facilities. People with service animals will be permitted to enter parts of our premises that are open to the public and to keep the animal with them, unless the service animal is otherwise prohibited by another law, in which case we will explain why the service animal is excluded and discuss with the client another way of providing our services and facilities.

A service animal can be easily identified through visual indicators, such as when it wears a harness or a vest, or when it helps the person perform certain tasks. When we cannot easily identify that an animal is a service animal, CDSPI staff may ask a person to provide documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

## **SUPPORT PERSONS**

A person with a disability who is accompanied by a support person, will be allowed to have that person accompany them on our premises and will have access to that support person while on our premises.

CDSPI will:

- Allow the support person, if requested by the client, to attend meetings;
- Request permission from the client to discuss confidential account information in front of the support person; and
- Ensure that the client and support person understand that the support person is there to accompany the client and therefore cannot direct or act for the client.

In certain cases, CDSPI might require a person with a disability to be accompanied by a support person when on the premises, for the health or safety reasons of:

- The person with a disability; or
- Others on the premises.

In these cases, before making a decision, CDSPI will:

- consult with the person with a disability to understand their needs;
- consider health or safety reasons based on available evidence; and
- determine if there is no other reasonable way to protect the health or safety of the person or others on the premises.

## **NOTICE OF SERVICE DISRUPTION**

CDSPI will provide clients with notice in the event of a planned or unexpected disruption in the facilities or services usually used by persons with disabilities. Notices will include:

- Information about the reason for the disruption;
- The anticipated duration of the disruption; and
- A description of alternative facilities or services, if available.

Notices will be placed at all public entrances, and if appropriate, CDSPI websites and outgoing telephone messages. CDSPI will not be able to give notice in case of an emergency temporary disruption.

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## TRAINING OF STAFF

CDSPI will provide accessible customer service training to all employees and volunteers, anyone who provides goods, services or facilities to customers on our behalf, as well as anyone involved in the development of our policies.

Training will include the following:

- An overview of the AODA Act, and the requirements of the customer service standard;
- How to interact and communicate with persons with various types of disabilities;
- How to interact with persons with disabilities who use an assistive device or require the assistance of a service animal or a support person;
- How to use equipment or devices available on CDSPI's premises or otherwise provided by CDSPI that may assist with the provision of products and services to clients with disabilities; and
- What to do if a person with a particular type of disability is having difficulty accessing CDSPI's products and services.

Training for new staff members will occur as part of CDSPI's orientation training for new staff, and will be provided as soon as practicable after the staff member has been assigned duties that include interaction with the public, or the development of policies, practices and procedures related to customer service. Ongoing training will be provided in connection with changes to this document.

CDSPI will maintain training records, including the dates on which training was conducted and how many people were trained.

## FEEDBACK

Comments on our services and how well those expectations are being met are welcome and appreciated. CDSPI will thoroughly review all customer feedback, investigate its relevance to our Customer Service Policy and to our accessibility commitments, and determine actions or steps to rectify to the customer's satisfaction.

Feedback regarding the way in which CDSPI provides goods and services to persons with disabilities can be shared by email, verbally or in written format and addressed to CDSPI. Clients can expect to hear back from us within 5 business days from the date we received the feedback.

CDSPI will make sure our feedback process is accessible to people with disabilities by providing or arranging for accessible formats and communication supports, on request.

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## INFORMATION AND COMMUNICATIONS STANDARDS

CDSPI is committed to meeting the communication needs of people with disabilities.

By January 1, 2016, CDSPI will ensure that its feedback processes, such as surveys or questionnaires, are accessible to persons with disabilities by providing or arranging for the provision of accessible formats or communication supports, upon request. CDSPI will notify the public about the availability of accessible formats and communication supports.

By January 1, 2017, CDSPI will, upon request, provide or arrange for accessible formats and communication supports for persons with disabilities in a timely manner that takes into account the person's accessibility needs due to a disability, and at a cost that is no more than the regular cost charged to other persons. The person making the request will be consulted to determine suitability of an accessible format or communication support.

If we are unable to convert information into an accessible format, we will explain why the information cannot be converted and provide a summary of the missing information. We will notify the public about the availability of accessible formats on our website.

## EMPLOYMENT STANDARDS

CDSPI will comply with the requirements of the [Employment Standards](#) by January 1, 2017. The Employment Standards apply in respect of employees, and not volunteers or other non-paid individuals.

CDSPI will notify the public and staff that, when requested, we will accommodate disabilities during recruitment and assessment processes and when people are hired.

CDSPI shall inform its employees of its policies used to support its employees with disabilities, including but not limited to, policies on the provision of job accommodations that take into account an employee's accessibility needs due to a disability. This information will be provided to employees as soon as practicable after they begin employment and as changes are made to existing policies on the provision of job accommodations that take into account an employee's accessibility needs due to disability .

Upon request by an employee with a disability, CDSPI will consult with the employee to provide or arrange for the provision of accessible formats and communication supports for information needed to perform the employee's job and information generally available to employees. The employee will be consulted on the suitability of an accessible format or communication support.

Where employee needs dictate, we will provide individualized workplace emergency response information to employees who have a disability. Our performance management, career development and redeployment processes will take into account the accessibility needs of its employees with disabilities.

## DESIGN OF PUBLIC SPACES STANDARDS

We will incorporate accessibility requirements under the Integrated Accessibility Standards Regulation when building or redeveloping a public space identified under the [Accessibility Standard for the Design of Public Spaces](#).

## **NOTICE OF AVAILABILITY OF DOCUMENTS**

CDSPI will notify the public that documentation that describes our accessibility commitments will be maintained on the CDSPI website and provided to individuals on request, in a format that takes into account the person's disability. We will provide the accessible format in a timely manner and at no additional cost.

## **MODIFICATIONS TO THIS OR OTHER POLICIES**

We are committed to developing client service processes that respect and promote the dignity and independence of people with disabilities. No changes will be made to this policy or other policies before considering the impact on persons with disabilities.

Our policies are maintained and updated regularly to reflect current practices and best serve our customers.