

## **Accessibility for Persons with Disabilities**

### **Provision of Services, Information, Communication, Employment and Built Environment**

#### **Purpose and Scope**

Polycultural Immigrant and Community Services is committed to creating and maintaining an accessible environment for all employees and the public and to fulfilling the requirements outlined in the Accessibility for Ontarians with Disabilities Act, 2005 (the “Act”).

Under the AODA, O. Reg 191/11: Integrated Accessibility Standards Regulation establishes standards to address barriers that people with disabilities face in the areas of information and communications, employment, design of public spaces, and customer service.

The requirements under the AODA work in conjunction with the Ontario Human Rights Code. The purpose of this policy is to outline the practices and procedures in place at Polycultural to help identify and remove barriers for people with disabilities.

#### **Application**

For the purposes of this policy, the term “employee” refers to any person regarding whom Polycultural pays wages or a salary, has control over their assigned work and has a right to control the details of their work. This includes, but is not limited to:

- a. full-time, part-time, supply employees
- b. seasonal employees
- c. contract employees
- d. volunteers/placement students

#### **Statement of Organizational Commitment**

Polycultural Immigrant and Community Services is committed to ensuring equal access for people with disabilities in a way that allows them to maintain their dignity and independence and embodies the principles of integration and equal opportunity.

Polycultural is committed to be a barrier-free environment for persons with disabilities in employment, in its communications and information, in the delivery of goods and services and in its built environment. We will do so by removing and preventing barriers to accessibility and meeting our accessibility requirements under the Accessibility for Ontarians Disability Act (AODA) and Ontario’s accessibility laws.

Polycultural is committed to ensuring that all its employees, contractors, and volunteers are aware of their responsibilities to foster an accessible and inclusive environment with, and for, persons with disabilities.

## Definitions

### Accessible formats

As defined by the Regulation, “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.

### Barrier

As defined by the Act, a “barrier” means anything that prevents a person with a disability from fully participating in all aspects of society because of their disability, including a physical barrier, an architectural barrier, an information or communications barrier, an attitudinal barrier, a technological barrier, a policy or practice.

### Communication Supports

As defined by the Regulation, “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

For the purpose of this policy, the term “disability” includes:

- a) 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,
- b) a condition of mental impairment or a developmental disability;
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) a mental disorder; or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the Workplace Safety and Insurance Act, 1997.

### Service Animal

For the purposes of this policy, 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 relating to the disability.

“Service animal” also includes a guide dog as defined under the Blind Persons’ Rights Act Section 1.

### **Support Person**

For the purposes of this policy, a “support person” is a person who accompanies a person with a disability in order to help with communication, mobility, personal care or medical needs or with access to goods or services. The support person could be a paid personal support worker, a volunteer, a friend or a family member. He or she does not necessarily need to have special training or qualifications.

### **Service Animals and Support Persons**

Unless otherwise prohibited by law, people with disabilities are permitted to be accompanied by a service animal or support person:

- a. where services are provided at premises owned or operated by Polycultural, and
- b. where the public or third parties have normally have access to such premises

Where a support person accompanying a person with a disability is required to pay an admission fee to enter our premises, notice of the amount of this fee is provided in advance of their visit.

### **Assistive devices**

Polycultural is committed to serving people with disabilities who use assistive devices. We will endeavor to become familiar with the various assistive devices used by people with disabilities and will be flexible in facilitating their use by people with disabilities to access our goods and services

### **Disruption in Service**

Polycultural will post timely public notice of a current or anticipated disruption in any facilities or services we provide to enable people with disabilities to access our services. This notice will include information about the reason for the disruption, its anticipated duration, and a description of alternative facilities or services, if available.

### **Employment**

#### **Recruitment, assessment or selection process**

Polycultural notifies its employees and the public about availability of accommodation for applicants with disabilities in its recruitment process.

During the recruitment process, Polycultural notifies job applicants that accommodation is available upon request in relation to the materials or processes to be used. If a selected applicant requests an accommodation, Polycultural consults with the applicant and arranges for the provision of a suitable accommodation that takes into account the applicant’s accessibility needs due to disability.

We notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment. We provide updated information to employees whenever there is a change to existing policies on the provision of job accommodation that take into account an employee’s accessibility needs due to a disability.

We will consult with employees when arranging for the provision of suitable accommodation in a manner that takes into account the accessibility needs due to disability. We will consult with the person making the request in determining the suitability of an accessible format or communication supports specifically for:

- a) information that is needed in order to perform the employee’s job; and
- b) information that is generally available to employees in the workplace

Polycultural provides individualized workplace emergency response information to employees who have a disability, if the disability is such that the individualized information is necessary and Polycultural is aware of the need for accommodation due to the employee's disability. Polycultural accommodates the needs of its employees with disabilities as required by the Ontario accessibility laws and Ontario Human Rights Code. Polycultural develops individualized accommodation plans for its employees with disabilities as Polycultural is made aware.

Polycultural maintains a documented return to work process for employees who have been absent from work due to a disability and who require disability-related accommodations and support in order to return to work.

### **Training**

Polycultural will provide training to:

- a. All its employees, volunteers, agents, contractors and others who could reasonably be expected to interact with the public or third parties on behalf of Polycultural.
- b. All those who are involved in the development, approval, monitoring or implementation of Polycultural customer service policies, practices and procedures about the provision of good and services to the public and/or third parties.

This training will be provided within 2 weeks of when the individual commences performing duties for Polycultural. Additional training will be provided within 2 weeks for any revisions made to this policy and/or related procedures and practices. Polycultural keeps a record of the training provided under this policy, including employee names and dates of completion.

Such training will include the following:

- a. A review of the purposes of the AODA and the requirements of its Customer Service Standard.
- b. How to interact and communicate with persons with various types of disability
- c. How to interact with persons with disabilities who use an assistive device or require the assistance of a guide dog or other service animal or the assistance of a support person.
- d. How to use equipment or devices available on Polycultural premises or otherwise provided by Polycultural that may help with the provision of goods or services to a person with a disability.
- e. What to do if a person with a particular type of disability is having difficulty accessing the provider's goods or services.

### **Feedback Process**

Polycultural is committed to meeting accessibility requirements and continuously taking steps to improve its services to comply with the AODA and its regulations. Polycultural welcomes feedback regarding the manner in which it provides goods, services or facilities to persons with disabilities. Feedback can be provided to the Director, Human Resources:

- In person at Polycultural, 17 Four Seasons Place, Suite 102, Toronto, Ontario M9B 6E6
- By telephone, 416-233-1655, ext 2233
- In writing to the Director, Human Resources, or
- By email to [hrstaff@polycultural.org](mailto:hrstaff@polycultural.org)

The Director, Human Resources will review and assess every complaint received. Where possible, the Director, Human Resources and Executive Director will ensure the issues are addressed. If a complaint cannot be addressed, the Director, Human Resources will advise the complainant.

#### **Responsibilities**

Polycultural is responsible for reviewing this Policy annually and recommending amendments to ensure on-going compliance with regulated accessibility standards and legislated obligations.

Supervisors and managers will ensure that they and their employees are familiar with this Policy.

#### **Monitoring and Contraventions**

Supervisors and managers will monitor current practices to ensure compliance.

Failure to comply with this Policy may result in disciplinary action, up to and including dismissal.

#### **Planned Strategies and Actions**

##### **Information and Communications**

Polycultural ensures that all its public websites and web content conform to WCAG 2.0 Level AA, except where this is not practical or there is an exception by law.

##### **Design of Public Spaces**

When constructing new service counters or waiting areas, Polycultural is committed to meeting the requirements under accessibility laws. Polycultural also ensures accessibility considerations will be incorporated when setting up temporary event spaces and/or modifying existing interior public spaces.



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Marwan Ismail  
Executive Director

February 23, 2026

Date