

Name: **Accessibility Policy**

Number: TBD

TYPE OF POLICY: Administrative – General

DATE OF APPROVAL: November 2011

AUTHORIZATION: CEO

NAME OF FORMER POLICY: Accessibility of Services and Programs / Customer Service

DATE OF LAST REVIEW: March 2026

DATE OF NEXT REVIEW: March 2028

PURPOSE

The purpose of this policy is to recognize the organization's obligation to facilitate the implementation of the Accessibility for Ontarians With Disabilities Act, 2005 (AODA) and, all regulations pursuant to the Act.

Keystone is committed to ensuring equal access and participation for people with disabilities. Keystone is committed to treating people with disabilities in a way that allows them to maintain their dignity and independence.

Keystone is committed to meeting the needs of people with disabilities in a timely manner and will do so by removing and preventing barriers to accessibility and by meeting our accessibility requirements under Ontario's accessibility laws.

SCOPE

This policy applies to all keystone facilities, programs, and services. It describes how Keystone works with its clients in a manner that respects the dignity, independence, integration and equal opportunity of persons with disabilities.

PROCEDURE

1. Provisions of Programs and Services to Persons with Disabilities

Keystone 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 clients receive the same value and quality;
- Allowing clients with disabilities to do things in their own ways, at their own pace when accessing programs and services as long as this does not present a safety risk;
- Using alternative methods when possible to ensure that clients with disabilities have access to the same services, in the same plane and in a similar manner;
- Taking into account individual needs when providing programs and services; and
- Communicating in a manner that takes into account the client's disability.

2. The Use of Assisted Devices

People with disabilities may use their personal assistive devices when accessing our goods, services or facilities.

In cases where the assistive device presents a significant and unavoidable health or safety concern or may not be permitted for other reasons, other measures will be used to ensure the person with a disability can access our goods, services or facilities.

Where service counters and waiting areas obstruct or hinder access to mobility aids, we will have the reception/admin provide individualized accommodation around the counter in a space that is accessible.

Keystone will ensure that staff are trained and familiar with various assistive devices that may be used by customers with disabilities while accessing our goods, services or facilities.

3. Service Animals

Keystone welcomes people with disabilities and their service animals. Service animals are allowed on the parts of our premises that are open to the public and third parties.

When Keystone cannot easily identify that an animal is a service animal, our staff may ask for documentation from a regulated health professional that confirms the person needs the service animal for reasons relating to their disability.

If service animals are prohibited by another law, Keystone will do the following to ensure people with disabilities can access our services or facilities:

- explain why the animal is excluded
- discuss with the customer another way of providing goods, services or facilities

4. Support Persons

Keystone is committed to welcoming people with disabilities who are accompanied by a support person. Any person with a disability who is accompanied by a support person will be allowed to enter our locations with his or her support person and the client shall have access to their support person at all times. In situations where confidential information might be discussed, consent will be obtained from the client, prior to any conversations where confidential information might be discussed.

Before making a decision, the organization will:

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

5. Notice of Disruptions

Keystone will notify persons with disabilities promptly in the event of a planned or unexpected disruption to programs, services or facilities. This notice will be provided in accessible forms and posted in public areas. This clearly posted notice will include information about the reason for the disruption, its anticipated length of time, and a description of alternative facilities or services, if available.

6. Client Feedback Process

Keystone welcomes feedback on how we provide accessible customer service. Customer feedback will help us identify barriers and respond to concerns.

Keystone has a process for receiving and responding to feedback and the process is accessible to persons with disabilities upon request.

Keystone will communicate with people with disabilities in ways that take into account their disability. When asked, Keystone will provide information about our organization and its services, including public safety information, in accessible formats or with communication supports:

- a) in a timely manner, taking into account the person's accessibility needs due to disability; and
- b) at a cost that is no more than the regular cost charged to other persons.

Keystone will consult with the person making the request in determining the suitability of an accessible format or communication support. If the organization determines that information or communications are unconvertible, the organization shall provide the requestor with:

- a) an explanation as to why the information or communications are unconvertible; and
- b) a summary of the unconvertible information or communications.

Keystone will notify the public about the availability of accessible formats and communication supports on our Keystone website.

Keystone will meet internationally-recognized Keystone web Content Accessibility Guidelines (WCAG) 2.0 Level AA Keystone website requirements in accordance with Ontario's accessibility laws.

Feedback on the accessibility of Keystone's programs and services is encouraged.

7. Training

Keystone will train all staff and volunteers in accessible customer service, other Ontario's accessibility standards and aspects of the Ontario Human Rights Code that relate to persons with disabilities. In addition, Keystone will train:

- a) all persons who participate in developing the organization's policies; and
- b) all other persons who provide services on behalf of the organization

Training of our employees and volunteers on accessibility relates to their specific roles. Keystone will train every person as soon as practicable after being hired and provide training in respect of any changes to the policies. Keystone will maintain records of the training provided including the dates on which the training was provided and the number of individuals to whom it was provided.

8. Notice of Availability and Format of Documents

Keystone shall

- notify clients that the documents related to the Customer Services Standards are available upon request and in a format that takes into account the customer's disability.
- provide these documents in an accessible format or with communication support, on request.
- consult with the person making the request to determine the suitability of the format or communication support.
- provide the accessible format in a timely manner and, at no additional cost.

9. Employment

Keystone will notify employees, job applicants and the public that accommodations can be made during recruitment and hiring and will consult with the applicants to provide or arrange for suitable accommodation.

Keystone will notify successful applicants of policies for accommodating employees with disabilities when making offers of employment.

Keystone will notify staff that supports are available for those with disabilities as soon as practicable after they begin their employment and 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.

Keystone 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.

Where needed, Keystone will provide customized emergency information to help an employee with a disability during an emergency. Keystone will provide the information as soon as practicable after Keystone will become aware of the need for accommodation due to the employee's disability.

Keystone will have a written process for employees who have been absent from work due to a disability and require disability-related accommodations in order to return to work.

Performance management, career development and redeployment processes take into account the accessibility needs of all employees.

